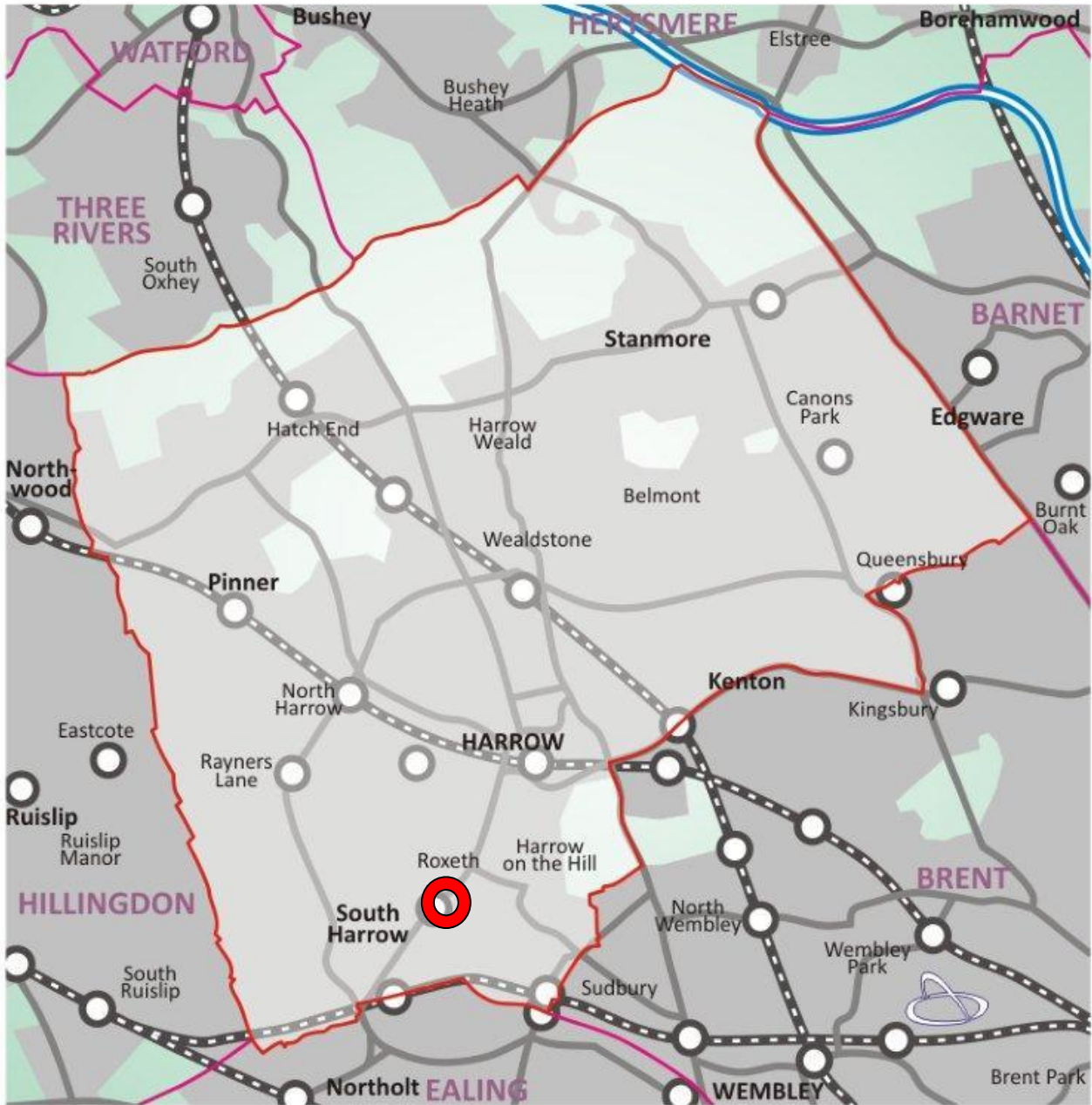


 = application site



**Grange Farm Estate, Harrow**

**P/3524/16**

# **LONDON BOROUGH OF HARROW**

## **PLANNING COMMITTEE**

**21<sup>st</sup> March 2018**

**APPLICATION NUMBER:** P/3524/16  
**VALIDATE DATE:** 27/07/2016  
**LOCATION:** GRANGE FARM ESTATE, HARROW.  
**WARD:** ROXBOURNE / HARROW ON THE HILL  
**POSTCODE:** HA2 0QA  
**APPLICANT:** MR PAUL MULLINS  
**AGENT:** DPP  
**CASE OFFICER:** CALLUM SAYERS  
**EXPIRY DATE:** 30<sup>TH</sup> MARCH 2018 (EXTENSION AGREED)

### **PURPOSE OF REPORT/PROPOSAL**

The purpose of this report is to set out the Officer recommendations to The Planning Committee regarding an application for planning permission relating to the following proposal:

Hybrid planning application for the comprehensive, phased, redevelopment of the Grange Farm Estate. The development comprises two elements:

- i) Detailed Planning Application for Phase 1 (Plot 2) comprising; Demolition of existing dwellings; Erection of Buildings C, D and E ranging from three to seven storeys in height to provide 89 residential units; Realignment of public highway; Landscaping of public realm; associated parking and cycle parking spaces.
- ii) Outline Application for access only and subject to Design Code (December 2017) in respect of Phases 2 and 3 comprising: Demolition of existing buildings; Erection of buildings on Plots 1 and 3 to 8 of up to max 93.70 metres in height above ordnance survey to provide 485 residential units; Community Centre (up to 1,350sqm) for D1/D2 uses within Plot 9; Community Facility (up to 282sqm) for D1 use within Plot 7.

### **RECOMMENDATION A**

The Planning Committee is asked to resolve to:

- (i) Agree the reason for approval as set out in this report; and
- (ii) Delegate authority to the Divisional Director of Regeneration, Enterprise and Planning to finalise the drafting of the planning conditions and Planning Obligations listed within this report; and
- (iii) Refer this application to the Mayor of London (the GLA) as a Stage 2 referral; and
- (iv) subject to the Mayor of London (or delegated authorised officer) advising that

- he is content to allow the Council to determine the application itself and does not wish to direct refusal, or to issue a direction under Article 7 that he is to act as the Local Planning Authority for the purpose of determining the application; and
- (v) That by 24<sup>th</sup> June 2018 or such extended period as may be agreed in writing by the Chairman of the Planning Committee. Authority to be given to the Divisional Director of Regeneration, Enterprise and Planning, in consultation with the Director of Legal and Governance Services, for the sealing of the (shadow) section 106 Planning Obligations, other enabling legislation, and to agree any minor amendments to the conditions or the Planning Obligations. The proposed (shadow) section 106 Planning Obligation Heads of Terms cover the matters listed below under Planning Obligations; and
  - (vi) Grant permission subject to the withdrawal of the Statutory Objection of the Ministry of Defence, or the applications referral to the Secretary of State as an application not in accordance with the Development Plan.

### **REASON FOR THE RECOMMENDATIONS**

The proposed development of the site would provide for the regeneration of a housing estate, which currently provides a very low quality, and not fit for purpose housing stock. The current housing stock, being affordable in tenure, would be replaced with an increase in affordable tenure floor space across the site, of a much higher quality. Furthermore, the proposed development would also provide for an increase over and above this with an offer of 333 private sale units, which would assist in funding the affordable element, and also provide a valuable contribution to the Borough's housing stock. The proposed housing stock would provide good quality of residential amenity for future occupiers, whilst not unacceptably harming the amenity of neighbouring occupiers. The proposed development would also result in the demolition of a poor quality community centre located on the site, and its replacement with a much more modern, multi-use, fit for purpose facility for the development site and wider community. Lastly, the proposed development would result in a much higher quality open space across the site, again, for the use and enjoyment of the future occupiers of the estate and also the wider community.

### **PRODECURAL ISSUES**

The application is reported to the Planning Committee because the scale of the development exceeds criterion 1(c)(h) of the Scheme of Delegation dated 29/05/13. The application is also made under Regulation 3 of the Town and Country Planning Regulations 1992 (as amended). Regulation 3 permits a local authority to make an application to itself for planning permission to develop land within its area and to then also determine the application. In this case, the planning application has been developed and submitted by the Council's Housing Department. The submission of the application by the local authority has another legal implication. Whereas, most applications of the scale described here would be accompanied by, or subject to, the completion of a s106 agreement, the local planning authority does not have the legal locus to enter in a legal agreement (such as a s106 agreement) with itself. Therefore, in order to secure safeguards, mitigation and maximise 'planning gain' for the redevelopment of the site, an alternative mechanism is required.

In this case, the revised strategy for securing these points has a number of strands:

1. Rather than financial contributions being secured through a legal agreement, they

are reported here, through the Planning Committee Report – a public document of record. The Housing Department will be required, as applicant, to allocate funding to the relevant stated departments to be spent on the required social or physical infrastructure improvements

2. Rather than including detailed obligations within a s106 agreement, conditions are recommended wherever these meet the required legal tests set out within the Planning Policy Guidance and Regulation 122 of the Community and Infrastructure Levy Regulations 2011 (as amended)
3. A 'shadow' s106 will be drafted to formally sit alongside the decision notice on the application, if planning permission were granted. The 'shadow' s106 would have 3 purposes: 1) to provide definitions that relate to planning conditions; 2) as a detailed informative on the obligations of the application in the exercise of conditions of development and; 3) in the event that the land was sold to someone with the legal locus to enter into a legal agreement, they would be legally bound (by way of a condition – see point 4) to enter into the legal agreement with the local authority.
4. It is recommended that the decision notice is split in two parts in a format similar to the conditions at the end of this report i.e. conditions marked with a single asterix (\*) are conditions that will always be binding through the decision notice for the detailed application, conditions marked with a double asterix (\*\*) includes conditions that would be binding to the outline permission, and conditions marked with a triple asterix (\*\*\*) would be replaced by a legal agreement, were the land owner to have the legal locus to enter into the legal agreement. A Condition specifically refers to this approach.

Though the model for development is not entirely identical to other London authorities, a similar approach has been adopted in London Borough of Camden for the determination of Regulation 3 applications that might normally have s106 agreements without legal challenge. It is considered an appropriate approach in this instance and officers recommend that it is adopted, in order to ensure the maximum planning gain is secured.

## **PLANNING OBLIGATIONS**

### **Provision of Community Centre and Design Quality Assurances**

- (vii) The developer undertakes to ensure that the approved Community Centre will be provided to the Council using any such mechanism as is deemed appropriate and within a timeframe to be agreed.
- (viii) The developer to provide a minimum of 282sqm of floor space for the relocation of the Air Cadets, and to ensure their relocation at the earliest practical timing
- (ix) The developer undertakes to set out a strategy for ensuring that the quality of the architecture and finish are preserved through all phases of development including delivery on site by way of compliance with the approved Design Code.

### **Affordable Housing and Wheelchair Homes**

- (x) A minimum of 241 homes (15,709sqm (social rent) and 1,611sqm (shared ownership), whereby totalling 17,320sqm) on the site to be provided as affordable homes in accordance with a schedule of accommodation (to include details of tenure and mix) to be approved in writing by the Council prior to the commencement of the development.
- (xi) A review mechanism (to be agreed) to enable the financial viability of the development to be re-appraised at an appropriate time point (or points) during the course of the development to enable any additional affordable homes to be provided on-site, in the first instance, otherwise as a cash in-lieu sum for off-site provision.
- (xii) 10% of affordable rented homes to be constructed as wheelchair homes and ready immediately upon completion for occupation by a wheelchair user.

### **Transport and Highways**

- (xiii) The developer to use all reasonable endeavours to secure the effective implementation, monitoring and management of the residential and non-residential travel plans for the site.
- (xiv) The Highways within the development are constructed to an adoptable standard, to the satisfaction of the Highways Authority, to allow the internal highway network to be formally adopted by the Council.
- (xv) The developer to make practical space available on the site (or on any adjacent land that comes within the control of the developer) or otherwise on the public highway within the vicinity of the site to accommodate a parking space for a car club vehicle. The developer to make reasonable endeavours throughout the life of the development to secure a car-club operator to provide a vehicle for that space.
- (xvi) The developer to pay a total of £40,000.00 to the Highways Authority at the practical completion of the development to undertake the relevant Controlled Parking Zone assessment (£10,000.00). In the event that the aforementioned assessment determines that a Controlled Parking Assessment is required within the development, the remaining £30,000.00 would be required to implement the Controlled Parking Zone.

### **Public Open Space**

- (xvii) The Developer to undertake and submit to and have agreed in writing a comprehensive site wide Management/Maintenance Plan for the open space; landscaping (both private and public communal areas); green roofs; blue infrastructure (swales etc) for the development. The Management/Maintenance Plan thereby agreed shall be retained and implemented thereafter.

### **Biodiversity / Ecology**

- (xviii) The developer to undertake a Biodiversity / Ecological Value Assessment of the existing site, and then another of the proposed development with proposed biodiversity enhancements. In the event that there is no net enhancement shown between the two assessments, the developer shall agree to offset this with a financial contribution, to be used for biodiversity / ecological improvements off site.

### **Refuse and Recycling**

- (xix) The developer to ensure that the on-site arrangements (including the provision of suitable collection containers) for the disposal of general waste and recyclable materials to be operative prior to first occupation of the development. The developer to take all reasonable steps to secure twice weekly collections of waste and recycling over the lifetime of the development.

### **Employment and Training**

- (xx) An employment and training plan that will be agreed between the council and the developer prior to start on site and;
- (xxi) Financial contribution towards the management and delivery of the construction training programme (Construction Employment Initiative (CEI)) based on the construction value of the development. This is calculated using the formula: £2,500 per £1,000,000 build cost.

### **Decentralised Energy Networks**

- (xxii) The developer to use all reasonable endeavours to ensure that the on-site energy centre is laid out with sufficient space to allow expansion and technical feasibility of CHP scheme to also serve any future redevelopment to the site access with Shaftesbury Road
- (xxiii) In the event of any future district decentralised energy network, the developer to use all reasonable endeavours to agree terms pursuant to a connection between the site-wide CHP system and the decentralised energy network.

### **Legal Costs, Administration and Monitoring**

- (xxiv) A financial contribution (to be agreed) to be paid by the developer to the Council to reimburse the Council's legal costs associated with the preparation of the planning obligation and a further (to be agreed) to be paid to reimburse the Council's administrative costs associated with monitoring the planning permission.

### **INFORMATION**

This application is reported to Planning Committee as it is a Major Development and Departure from the Development Plan and therefore falls outside Schedule 1 of the Scheme of Delegation.

Statutory Return Type:	Regulation 3
Council Interest:	Council Owned Land
GLA Community Infrastructure Levy (CIL) Contribution (provisional):	TBC
Local CIL requirement:	TBC

## **HUMAN RIGHTS ACT**

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

## **EQUALITIES**

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

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

## **S17 CRIME & DISORDER ACT**

Policies 7.3.B and 7.13.B of The London Plan and policy DM1 of the Development Management Policies Local Plan require all new developments to have regard to safety and the measures to reduce crime in the design of development proposal. The applicant has been through a pre-application process, and running in tandem with this has had numerous meeting with the MET Police (Secure By Design Officer) to ensure the scheme does not conflict with Secure by Design principles. The MET Police have been consulted as part of this current application, and generally are supportive of the scheme. However, have requested that a condition be imposed for further information to be submitted in relation to ensuring compliance with Secure by Design Principles. Accordingly, it is considered that subject to conditions the development does not adversely affect crime risk.

## **LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985 BACKGROUND PAPERS USED IN PREPARING THIS REPORT:**

- Planning Application
- Statutory Register of Planning Decisions
- Correspondence with Adjoining Occupiers
- Correspondence with Statutory Bodies
- Correspondence with other Council Departments
- National Planning Policy Framework
- London Plan
- Local Plan - Core Strategy, Development Management Policies, SPGs
- Other relevant guidance

## **LIST OF ENCLOSURES / APPENDICES:**

Officer Report:

Part 1: Planning Application Fact Sheet

Part 2: Officer Assessment



Appendix 1 – Conditions and Informatives  
Appendix 2 – Site Plan  
Appendix 3 – Site Photographs  
Appendix 4 – Plans and Elevations

## OFFICER REPORT

### PART 1 : Planning Application Fact Sheet

The Site	
Address	Grange Farm, Harrow, HA2 0QA
Applicant	London Borough of Harrow
Ward	Harrow on the Hill / Roxbourne
Local Plan allocation	N/A
Conservation Area	N/A
Listed Building	N/A
Setting of Listed Building	N/A
Building of Local Interest	N/A
Tree Preservation Order	N/A
Other	Designated as Open Space

Housing		
Density	Proposed Density hr/ha	380
	Proposed Density u/ph	140
	PTAL	Existing 2 – 3 Proposed to meet 4 (Increased through proposed enhancements)
	London Plan Density Range	50 – 130 u/ph
Dwelling Mix	Studio	0%
	1 bed (2 person)	38%
	2 bed (4 person)	53%
	3 bed (5 person)	6%
	4 bed (6 person)	3%
	Overall % of Affordable Housing	42%
	Social Rent (No. 241)	42%
	Private (No. 333)	58%
	Commuted Sum	NIL
	Comply with London Housing SPG?	Yes
	Comply with M4 <sup>(2)</sup> of Building Regulations?	Yes

Non-residential Uses		
Existing Use(s)	Existing Use / Operator	Community Centre
	Existing Use Class(es) sqm	74sqm
Proposed Use(s)	Proposed Use / Operator	Community Centre
	Proposed Use Class(es) sqm	1350sqm
Employment	Existing number of jobs	Unknown
	Proposed number of jobs	Unknown

Transportation		
Car parking	No. Existing Car Parking spaces	122
	No. Proposed Car Parking spaces	261
	Proposed Parking Ratio	0.47
Cycle Parking	No. Existing Cycle Parking spaces	0
	No. Proposed Cycle Parking spaces	943 Community Centre to be detailed at Reserved Matters Stage
	Cycle Parking Ratio	1.6
Public Transport	PTAL Rating	Existing: 2 – 3 Proposed: 4
	Closest Rail Station / Distance (m)	Approx: 400m
	Bus Routes	None within Grange Farm Estate. However, can be accessed by 9 bus routes.
Parking Controls	Controlled Parking Zone?	Not within Grange Farm Estate
	CPZ Hours	N/A
	Previous CPZ Consultation (if not in a CPZ)	None
	Other on-street controls	None

Parking Stress	Area/streets of parking stress survey	Parking Stress within the application site
	Dates/times of parking stress survey	Throughout the day: Commencing prior to 5am to determine vehicles owned by occupiers, and after 5am by those owned by commuters
	Summary of results of survey	Noticeable pressure on internal parking provision as existing.
Refuse/Recycling Collection	Summary of proposed refuse/recycling strategy	Located internally within buildings they are intended to serve, and also within basement parking.

Sustainability / Energy	
BREEAM Rating	
Development complies with Part L 2013?	Each phase meets 35%
Renewable Energy Source / %	Combined Heat and Power unit in Phase 2 to serve entire site.

## **PART 2 : Assessment**

### **1.0 SITE DESCRIPTION**

- 1.1 The Site is located in South Harrow and is bounded partly by Shaftsbury Avenue to the north-east, Osmond Close to the south-east, the Northolt Road Retail Park and associated car park and servicing area to the south-west, the rear of residential properties fronting Dudley Road to the north-west and is partially bounded by Northolt Road to the east. The site area is approximately 4.1 ha in area, is an irregular shape and has a 'domed' topography with the peak located at the existing playground at the centre of the site. Historically, the site was utilised as farm land with associated agricultural buildings until the mid-20<sup>th</sup> century.
- 1.2 The Site presently consists of 282 existing dwellings that are variously provided within 25 identical three storey clusters (built in the 1960s) the three storey Genesis Housing Association residential blocks to the west, a more recent red brick housing development located in the south east consisting of several bungalows and three storey apartment buildings. A single storey community centre is situated towards the centre of the Site and the single storey Territorial Army centre is located adjacent to Northolt Road.
- 1.3 The buildings are recessed from the highway and surrounded by rudimentary landscaping with no clear definition of ownership and control, resulting in an inefficient and poorly defined open space. The more recent red brick dwellings located on Osmond Close are relatively isolated and include pockets of secluded spaces. The Genesis Housing Association accommodation, again includes some modern red brick housing that is segregated from the wider Estate.
- 1.4 Vehicular access to the Site is via Wesley Close and Osmond Close. There is a single pedestrian only access point via Osmond Close to the south east of the Site that leads onto Northolt Road.
- 1.5 South Harrow Underground Station lies approximately 380m to the south and there are a number of bus routes along Northolt Road and Eastcote Lane. Therefore Grange Farm benefits from a PTAL rating of 2-3 (poor to moderate). Furthermore the site is located within Flood Zone 1 and hence is at a low risk of flooding.

### **Surrounding Urban Context**

- 1.6 The site is surrounded by a mix of land uses including the following:
  - The north of the site, the area is characterised by semi-detached and terraced housing, beyond which are playing fields and Whitmore High School.
  - To the east of the site, there are various uses including the Royal British Legion Harrow Club, the Harrow Police Station, a hotel and other smaller commercial uses. The buildings east of the site reach up to nine storeys in height. Further to the east are a mix of post war and contemporary

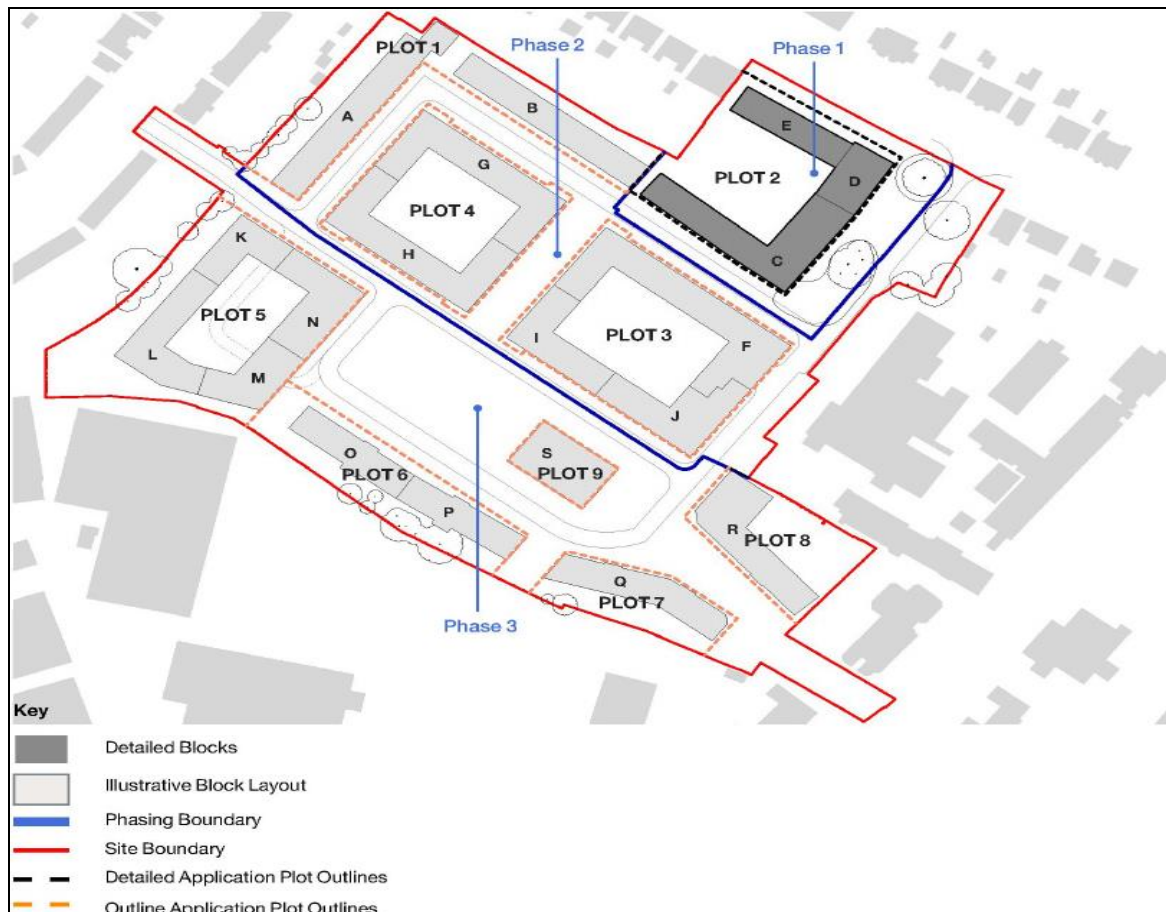
housing.

- The Northolt Road Retail Park and associated car parking and servicing areas are located to the south of the Site, beyond which is the South Harrow Industrial Estate.
- Further semi-detached and terraced housing is located to the west of the site.

1.7 The site is not situated within a conservation area but there are several such areas located east of the site. The nearest conservation area being the Roxeth Hill Conservation Area, which is situated approximately 163 metres east of the site. 29-37 Hornbuckle Close, is a Grade II listed building and is also located east, some 180 metres from the site.

## 2.0 **PROPOSED DETAILS**

- 2.1 The proposed development involves the comprehensive redevelopment of the site to provide a modern housing development that strengthens and reinvigorates the surrounding area and provides residential choice and mix. The overarching strategic vision of the scheme is to deliver a new lifetime neighbourhood that naturally connects with the wider Borough.
- 2.2 The development would consist of approximately 574 dwellings, delivered over 19 high quality and distinctive new buildings, varying between two and seven storeys in height, divided into market and affordable rent housing. A community centre of circa 1,350 m<sup>2</sup> is also proposed, replacing the existing underperforming facility.
- 2.3 The site will accommodate 260 residential car parking spaces, split between podium and surface level in conjunction with 943 long stay and 12 short stay (at the community centre) cycle parking spaces, landscaping and public realm space that includes a hierarchy of open spaces, both public and private. There will also be an on-site energy centre, which will utilise combined heat and power (CHP) technology for the benefit of residents and the wider South Harrow area.
- 2.4 It is proposed to bring the development forward as a Hybrid Planning Application, which will involve Phase 1 as a full planning application (Inclusive of Landscaping), and Phases 2 and 3 under an Outline Permission. The proposed development would come forward as detailed in the following image and in the commentary that follows;



Full planning permission is sought for Phase 1 as follows: -

- Demolition of some of the existing dwellings;
- Realignment of public highway (inclusive of through-route vehicle access from Shaftesbury Avenue and Dudley Road). Enhancements to public realm
- Erection of Proposed Blocks C, D, E (Residential), ranging from two up to seven storeys.
- Delivery of 89 residential units of which would all be as an affordable provision. 68 units would be social rent and 21 units shared ownership.
- Site wide open space and landscaping proposal
- Provision of 26 car parking spaces and 151 cycle spaces
- Temporary CHP

2.5 The full planning permission would specifically cover the following development across the site:

### Highways

2.6 Within the existing Grange Farm Estate, the highway network is made up of Osmond Close, Grange Farm Close and Wesley Close. None of these allow for vehicle permeability through the site. The proposed re-orientation of the highway network would result in a primary road accessed off Shaftesbury Avenue, which would travel southwest for approximately 150m. At this point, it would change

direction 90 degrees to travel 225m to provide access to Dudley Road. This would provide the primary thoroughfare through the site. Two secondary highways would also be located within the site, each looping off the primary road before linking back with it. Each of these roads would be shared surfaced, enabling a more pedestrian dominated area. The internal roads that are capable of providing vehicular transport (along with associated parking and footpath) would be adopted by the Highways Authority. The access way located between Plots 3 & 4 (Phase 2) would not be adopted as this would primarily be a pedestrian route.

- 2.7 The existing Air Cadets accessed from Northolt Road is proposed to be demolished (Air Cadets to be relocated into the ground floor of proposed Block Q) and this area would provide the primary pedestrian access to the site. On the southern boundary between the eastern flank elevation of Plot P and the western flank elevation of Plot Q, a public walkway would enter into the Waitrose car park.
- 2.8 It is proposed to provide 260 car parking spaces on the site, which will involve 85 spaces located within the podium under Plots F and I. The remaining would be located at surface level across the site. Secure cycle storage for 943 cycles is proposed across the site, with the majority of these located within the internal fabric of the proposed buildings.
- 2.9 The podium parking would be located between Plots F, I and J, which are located at the highest point on the site. This results in a basement/podium parking facility to be erected with minimal excavation. It would be accessed between the south eastern ends of Plots F & J. The surface of the podium would be finished in hard and soft landscaping.

## **Building Development**

### *Plot C (Courtyard)*

- Is a 'L' shape building in the north-western corner of the site, and the second building when accessed from Shaftesbury Avenue. It would be located on the corner of the main access road and the first secondary road when accessed from Shaftesbury Avenue.
- It would be 36m in length along the main access in the site, with a depth of 13.5m at the northern end. Where this block meets Block D, it has a roof height of 25m, before decreasing down to the corner, and a height of 19.5m. From the junction with the main access from Shaftesbury Avenue with the first secondary road, it would have a length of 59m, with a maximum depth of 12.0m. From the corner roof height of 19.0m, it would increase to a height of 25m, before decreasing down to an eaves height of 17m near where this block would be adjacent to Block B.
- The element fronting the secondary road would provide accommodation which would be arranged as dwellings split over two levels, each with private accesses. The remaining units above would be flats.
- Internal cycle and refuse storage would be provided.
- Plot C would provide 60 units, all of which would be social rent. Four of these units would be designated as Wheelchair Units.

### *Plot D (Courtyard)*



- Would be located on the western side of the primary access into the site off Shaftesbury Avenue. It would run in a more north to south orientation, and be located on the eastern end of proposed block E.
- It would be 20m (where it connects with Block C) in length with a depth of 12.0m. This element would have five floors of accommodation at the northern end with a roof height of 18.2m, before increasing to 6 floors of accommodation with a height of 25m. Whilst it is noted as having 6 floors of accommodation, the roof form continues to increase above this, where it meets the seven floors of accommodation within Block C.
- Internal cycle and refuse storage would be provided.
- This block would provide for 21 units, all of which would be shared ownership.
- Amenity space would be provided by way of projecting balconies.

#### *Plot E (Metroland)*

- This element would be located in the north western corner of the site. It would be fronting onto Shaftesbury Avenue, and be located between the existing dwellings to the east, and proposed Plot D.
- It would be 44.0m in length (where it then joins into Block D), with a depth of 10.0m. It would have an eaves height of 6.8m and a maximum height of 11.8m.
- It would provide eight two-storey dwellings, with accommodation and amenity space within the roof space.
- Two secure cycle spaces would be located in each of the rear gardens.
- Off-street car parking would be provided directly from Shaftesbury Avenue, along with secure bin stores.

### **Access**

- 2.10 As part of the full planning permission, the proposed considerations would also include access. Access would include consideration of the access into the site, and also the proposed access to the buildings. This is detailed further throughout the report.
- 2.11 In terms of the proposed access to the site, the proposed main vehicle highway access would be via the existing access points from Shaftesbury Avenue and Dudley Road. The proposed development would also provide two additional pedestrian access points, being one from Northolt Road and another into the Waitrose Car Park (between Blocks P & Q).

### **Outline Planning Application**

- 2.12 Outline planning permission is sought for Phases 2 and 3, the remainder of the site. Other than the Access Detail, which is considered under the Full Permission of the site, all matters are reserved. However, details in terms of layout and building heights have been submitted. The outline component of the application includes the following overview:-

- Demolition of the remainder of the existing dwellings
- Erection of Blocks A, B, F, G, H, I, J, K, L, M, N, O, P, Q, R and S.
- Provision of 485 units, comprised of 148 social rent, 4 shared ownership and 333 private sale

- Provision of the detached community centre.
- The outline element would provide 234 car parking spaces and 792 cycle spaces.
- Subject to Design Code

2.13 The outline application element of the development is supported by a Design Code, however, this also provides guidance and is read in association with the Design & Access Statement for the full permission element. This approach is taken to assist in ensuring that there is a consistent approach in the design and appearance of the scheme.

2.14 With regard to the erection of the buildings, these must be in accordance with the Design Code that has been submitted as part of the application. It is reasonable that there is some flexibility in the delivery of the outline element, however, control must still be retained over maximum heights and footprints etc.

2.15 The proposed building envelopes would provide a minimum height and a maximum height, each of which is provided meters above ordnance datum (AOD). Each of the blocks are detailed as follows;

Block	Block Type	Maximum Roof Height (AOD)
Block A	Metroland	84.82
Block B	Metroland	78.35
Block F	Courtyard	91.74
Block G	Courtyard	93.70
Block H	Courtyard	87.87
Block I	Courtyard	89.29
Block J	Courtyard	89.79
Block K	Courtyard	81.58
Block L	Courtyard	81.58
Block M	Courtyard	84.09
Block N	Courtyard	86.49
Block O	Mansion	85.74
Block P	Mansion	85.52
Block Q	Mansion	89.40
Block R	Mansion	88.50
Block S	Community Centre	85.10

2.16 As previously mentioned, the outline development would need to be permitted through a reserved matters application. The proposed Design Code will nonetheless need to be adhered to when any reserved matter applications are submitted following the approval of an outline component.

2.17 Each of the remaining blocks as detailed within the above table, would come forward in Outline Form. However, in order to demonstrate that the proposed quantum of units/development is able to be provided on the site, the applicant has provided plans to demonstrate that such a development would be able to be achieved on the site. To this extent, the submitted detail demonstrates the footprint layouts of the remaining two phases, along with their respective heights.

Furthermore, the submitted detail provides a design and accommodation layout that could be provided on the site. Whilst this element is not subject to a full planning permission assessment, it is noted that subject to a reserved matters application, the application site would be able to accommodate the proposed quantum of development.

2.18 As mentioned previously, a reserved matters application would have to follow any outline permission granted. However, any Outline permission granted would be subject to a Design Code, which will set parameters and requirements that any future reserved matters application would be required to comply with to ensure an acceptable development.

2.19 Lastly, it is noted that along with the residential elements coming forward within the Outline Element, the replacement Community facility would also be proposed. This element is again subject to parameters as set out in the Design Code, and would need to be brought forward in accordance with this approved document.

2.20 Aside from the siting and the heights of the proposed buildings subject to the outline element of the scheme, the Design Code also provides requirements in terms of;

- Expressing rooflines
- Emphasising the corners
- Dormers & Chimneys
- Stepping Plinth responding to scale
- Elevations solid to void ratio
- Hierarchy of Entrances
- Successful Material Palette
- Internal layouts

2.21 Any reserved matters application will only be successful if it the requirements set out within the Design Code are brought forward accurately.

### **Combined Heat and Power (CHP)**

2.22 The proposed development is required to meet carbon reductions beyond the building regulations. In this instance it must provide a 35% savings beyond this legislative threshold. To achieve this, the application must complete a review of the available technologies and conclude which would and which would not be viable as part of the scheme.

2.23 Located beneath proposed Block F, it is proposed to provide a Combined Heat and Power system for the entire development. This element would be brought forward within Phase 2 of the development.

2.24 Careful siting of Photovoltaics would also provide added benefit, with approximately 500sqm of the overall roofspace available for such technologies. Lastly, Air Source Heat Pumps are also considered to be a viable technology in providing renewable energy on site.

- 2.25 Ventilation is proposed via the use of Mechanical Ventilation with Heat Recovery (MVHR).
- 2.26 The submitted energy and sustainability statement concludes that the technologies proposed to be utilised within the development would result in a 35% saving of each phase when measured against Part L 2013 Building Regulations.
- 2.27 Temporary measures would be in place within Phase 1, prior to the installation of the CHP within Phase 2.

#### Landscaping

- 2.28 The applicant has submitted significant detail in relation to the landscaping of the site, which predominately relates to the publically accessible/communal areas of the site. However, throughout the amendments to the scheme, it was noted that the detail no longer related the communal areas that were more akin to private communal amenity space. These areas could not be detailed as the internal layouts of the blocks they are associated with are not set, as this will occur during the Reserved matters stage.
- 2.29 Furthermore, it was noted throughout the consideration and assessment of the current application that there was an imbalance between the hard and soft landscaping across the site. This was felt to have an impact on the quality of the open space, and the character of the overall redevelopment. Accordingly, it was considered, and agreed with the applicant, that the Landscaping element would be withdrawn from the full consideration, and would come forward under Reserved matters stage.
- 2.30 Whilst the landscaping would be considered under the Reserved matters stage, the submitted landscaping to date should not be ignored. The detail submitted to date provides a clear approach and vision for the site to incorporate a high quality landscaping for the redevelopment site. Lastly, the Design Code would provide some comfort in what ought to be brought forward in any subsequent approvals.

#### Amendments to the Scheme

- 2.31 There have been substantial changes to the development from the original scheme that was submitted in 2016. The changes have come about by way of an objection from the Ministry of Defence (MoD), who is a statutory consultee, in relation to the safeguarding of the nearby RAF Northolt. The basis of the consultation was in relation to the heights proposed under the original scheme, which were considered to be harmful to the safe operation of the airport. Further details with regard to this are discussed elsewhere within the report.
- 2.32 The impact of this objection resulted in a significant change to the appearance of the development from a design perspective. The proposed redevelopment, in conjunction with the above objection, also must consider the Open Space designation of the site (impacting on site coverage of buildings) and also no net loss of affordable housing floorspace on the site (largely funded by the sale of a required amount of market sale units). This has placed great pressure on the

development to achieve all of the above, and yet still ensure that a high quality design that did not unacceptably harm neighbouring occupiers was provided.

- 2.33 The proposed development has therefore resulted in a lowering of some of the taller buildings, predominantly on the southern edge of the development, but also centrally, as this is the highest part of the site by reason of site levels. Essentially, the development has been amended to more widely spread out the residential development across the site, whereby resulting in more, larger blocks, but still lower than originally proposed. However, given that the proposed redevelopment must re-provide the affordable floorspace on site, there is no potential to decrease the amount of development on the site. The proposed market sale units are still required at the same quantum, as they are the primary funding mechanism for the affordable units, and the community centre. Again, the same amount of car parking and cycle storage is still required to be provided.

### 3.0 **RELEVANT HISTORY**

- 3.1 None

### 4.0 **CONSULTATION – 1<sup>ST</sup> ROUND**

- 4.1 Seven Site Notices were erected on 4<sup>th</sup> August 2016, expiring on the 25<sup>th</sup> August 2016. These were located around the outside of the Grange Farm Estate
- 4.2 Two Site Notices were erected within the Grange Farm Estate on the 10<sup>th</sup> August 2016, expiring on the 31<sup>st</sup> August 2016.
- 4.3 Press Notice was advertised in the Harrow Times and the Harrow Observer on the 28<sup>th</sup> July 2016 expiring on 17<sup>th</sup> August 2016.
- 4.4 The application was advertised as a major application and a departure from the development plan.
- 4.5 A total of 773 consultation letters were sent to neighbouring properties regarding this application. The public consultation period expired on 17 August 2016.

### **CONSULTATION – 2<sup>nd</sup> ROUND**

- 4.6 Following on from the consultation process carried out in relation to the above, an objection was received by the Ministry of Defence (MOD) in relation to the flight path of RAF Northolt. In response to the objection, the applicant has revised the scheme in an attempt to overcome the concerns from the MOD. The changes are detailed elsewhere within this report.
- 4.7 Site notices were erected around the site on the 22<sup>nd</sup> December 2017
- 4.8 Paper 21<sup>st</sup> December 2017 Press Notice was advertised in the Harrow Times and the Harrow Observer on the 21<sup>st</sup> December 2017 expiring on 12<sup>th</sup> January 2018.
- 4.9 The application was advertised as a major application and a departure from the

development plan.

4.10 A total of 773 consultation letters were sent to neighbouring properties regarding this application. The public consultation period expired on 18<sup>th</sup> January 2018.

#### 4.11 Adjoining Properties

Number of Letters Sent	773
Number of Responses Received	12
Number in Support	1
Number of Objections	10
Number of other Representations (neither objecting or supporting)	1

4.12 10 objections were received from adjoining residents.

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

<b>Details of Representation and date received</b>	<b>Summary of Comments</b>	<b>Officer Comments</b>
Mr Pawel Such, Templar House, 82 Northolt Road, Harrow, HA2 0YL	Parking congestion  Property Value will decrease  View will be obstructed by proposed nine storey building	Issues relating to parking congestion are assessed in section 23 of this report.  Not a planning matter  Not a planning matter
Ms. E. Gordon Reid. 39 Shaftesbury Avenue, HA2 0PL	You will note that I have objected from the start, and am not in agreement with the loss of my back gate. I feel the council are trying to 'steamroller' me and I feel cruelly victimised and intimidated. It seems to me that you do not care about longstanding residents, even those who have followed your advice in the past. My property has solar panels in the rear roof added under a Harrow Council scheme. If I lose the gate, how am I to access and maintain them? Your incredible response has	The loss of a gate is not a material planning matter. Rather, the resolution of the access at this location is a civil matter between landowners. However, it is noted that this property is within the Phase 2 element, which would come forward under a more detailed Reserved matters application, which may provide an opportunity for resolution at this point. However, it cannot be considered in making a determination of the substantive planning permission.

	<p>been that it is not your problem! Without that access, they could not have been added to the property under your own advice!</p> <p>My property has a red bus stop at the front. Builders and contractors will not access it from the front due to the bus stop. We recently had a flood. All work was carried out from the back due to the bus stop.</p> <p>You are cutting access to my property. This is unjust and it appears that the council is literally sacrificing me to force through your plans. No others are in my position.</p> <p>There is no reason why a block cannot be moved down in order to provide a much needed car park, or green area for relaxation behind my property. Even the corner of such areas would allow access. There is plenty of space showing at the sides to provide such a solution. Mr Rahman has kindly forwarded the police advice about social problems in alleys. However, looking at the space and layout of your plan, there is more than adequate for things to be 'swapped' along the back of the Shaftesbury Avenue fences.</p> <p>This matter may be small for you in the scheme of your development, yet for me it is critical. It will cost me thousands of pounds over the years for work to be done and leave me in an extremely vulnerable position</p>	<p>This is not a planning matter, and rather is a civil matter between property owners.</p> <p>This is not a planning matter, and rather is a civil matter between property owners.</p> <p>This is not a planning matter, and rather is a civil matter between property owners. The Local Planning Authority must consider the plans before it, and make a recommendation in accordance with the Town &amp; Country Planning Act (1990).</p> <p>This is not a planning matter, and rather is a civil matter between property owners. The Local Planning Authority must consider the plans before it, and make a recommendation in accordance with the Town &amp; Country Planning Act (1990).</p>
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	<p>of contractors refusing my work due to the bus stop. Is this something you would accept for your own homes? To see my position as insignificant is to trample over me, wilfully force and overpower me. It is wrong to do so, especially when the problem has a solution in re-aligning the blocks.</p>	
John Bryce, 11 Dudley Road, Harrow, HA2 0PB	<p>Amount of traffic on Dudley Road throughout the construction phase; narrow road and implications for access by emergency services</p> <p>Dudley Road should become a one way street.</p>	<p>Traffic has been considered under section 23. The applicant has designed the scheme to ensure access of emergency vehicles.</p> <p>Noted: However, such a proposal is not within the remit of the Local Planning Authority in determining this planning application.</p>
Maya Devi Rai, 89 Wesley Close, Harrow, HA2 0QE	<p>Consideration be given to accommodation of the area of Rooksheath College</p>	<p>Outside of the remit of this proposed development.</p>
Anonymous, South Harrow Resident	<p>Proposed housing number is excessive and would lead to overcrowding</p> <p>High rise buildings are excessive and would dominate the skyline, turning the area into a concrete jungle</p> <p>Loss of privacy as a result of the tall buildings.</p> <p>Buildings will place strain on local infrastructure (Schools / GP's)</p> <p>Insufficient parking for the proposed number of units.</p>	<p>The proposed development would fall within the density matrix within the London plan (2016). Considered further under Section 10</p> <p>The design rationale of the site responds to the prevailing context. Considered further under Section 13</p> <p>Considered under Section 11 and 12.</p> <p>Community Infrastructure Levy for the market properties will retrieve funds towards these services.</p> <p>Proposed parking complies with policy, and mitigation measures are proposed;</p>



	<p>No parking capacity in neighbouring streets</p> <p>Not enough local support for the scheme</p>	<p>Considered further under Section 23</p> <p>Considered under Section 23</p> <p>Stakeholder consultation is one of many material considerations when determining a planning application.</p>
Sahar Haidari, 53 Osmond Close, Harrow.	Application has been made to demolition a property that is not owned by the Applicant.	The applicant is able to include properties within the development scope provided the owner has been served notice. The granting of any planning permission will not over ride private property rights.
Caroline Stride, 69 Dudley Road, Harrow, HA2 0PS	<p>The proposed buildings are too high and would result in a loss of privacy.</p> <p>The building heights would result in loss of light and living conditions</p> <p>There is an existing parking congestion problem within Dudley Road, and the proposed new traffic would exacerbate this</p>	<p>Considered under Section 11</p> <p>Considered under Section 11 and 12</p> <p>Considered under Section 23</p>
Lorraine McBride, 63 Dudley Road, Harrow, HA2 0PS	<p>The proposed development is excessive and an over development of the site. Too many people would be inhabiting the site.</p> <p>Would result in a loss of light and privacy to neighbouring occupiers.</p> <p>Increase in crime, litter and anti-social behaviour.</p>	<p>The proposed development would fall within the density matrix within the London plan (2016). Considered further under Section 10</p> <p>Considered under Section 12</p> <p>Secure by Design Officer has reviewed the scheme, and subject to a safeguarding condition, is satisfied it would be acceptable in terms of crime.</p>

	Development should be limited to three storeys as present.	Scheme must be considered based on the development proposed.
<b>Second Round Comments</b>		
Susan, 38 Brooke Avenue, Harrow, HA2 0NF	Having 1 parking space for every 2 units is inadequate. Amount of development would be harmful to parking within the surrounding streets and impact on the capacity of the public transport (buses and tube).	Considered under Section 23
Helen Potts, 62 Eastcroft House, Harrow, HJA2 0ER	<p>Whilst in favour of improving the area, plots 7 and 8 Block Q &amp; R) are in close proximity to Eastcroft House and Templar House, would be intrusive, compromise privacy.</p> <p>There is already parking issues within the area and the proposed development would exacerbate this.</p> <p>Development should have a few less homes, especially at Plot 7 and 8, which should be low rise, with more focus on amenities such as sports facilities or independent business.</p>	<p>Considered under Section 11 and 12</p> <p>Considered under Section 23</p>
Local Resident, Station Road, Harrow, HA1 2XY	<p>Too many houses for private sale and not enough for affordable tenure for lower wage earners</p> <p>Not an adequate parking provision.</p> <p>Council will have to resolve issues of overcrowding.</p> <p>How will the Council build more social homes that needed for renting.</p>	<p>Housing tenure is based on the Viability of the scheme</p> <p>Considered further under Section 23</p> <p>No evidence to suggest that the proposed development would result in overcrowding.</p> <p>The proposal is considered on its own merit.</p>

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#### 4.14 Statutory and Non Statutory Consultation

#### 4.15 The following consultations have been undertaken\*:

LBH Environmental Health  
 LBH Highways  
 LBH Planning Policy  
 LBH Design  
 LBH Conservation Officer  
 LBH Tree Officer  
 LBH Regeneration  
 LBH Landscape Architects  
 LBH Cycling  
 LBH Lighting Section  
 LBH Waste Officer  
 Transport for London (TfL)  
 EDF Energy (Network PLC)  
 Environment Agency  
 Designing Out Crime Officer, Metropolitan Police Service  
 Thames Water Authority

#### 4.16 External Consultation

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

Consultee	Summary of contents	Officer Comments
Greater London Authority	The Mayor supports the scheme in principle, but notes that it is not in, and makes the following conclusions on the development:	Noted
	<b>Principle of Development:</b> will redevelop the existing housing estate to provide better quality housing and a significant in housing provision, is strongly supported.	Noted
	<b>Housing &amp; Affordable Housing:</b> Council to confirm proposed private unit mix is in line with local needs. Reprovision of affordable housing is welcomed. GLA officer will work with the Council to ensure that the scheme provides the maximum reasonable	Noted: Affordable Housing tenure / mix meets the local need.

	<p>affordable hosing on site including intermediate housing if viable, and the viability reviews should be at fixed points during the redevelopment.</p> <p><b>Open Space and playspace:</b> Should be confirmed that there would no net loss of playspace during the development phases.</p> <p><b>Urban design:</b> Overall approach to the masterplan, the landscaping and the architecture is supported. Further clarification is sought on the design of the pedestrian links, particularly the southern link to Waitrose</p> <p><b>Inclusive access:</b> Confirmation should be provided that all estate's routes, spaces and public buildings are fully accessible, and that accessible routes to public transport are provided.</p> <p><b>Climate Change:</b> Must provide an updated energy assessment which demonstrates that Building Regulations 2013 standards are exceeded through energy efficiency measures along. Updated figures for carbon savings should be provided. Furthermore information on the CHP system, overheating analysis and cooling demand should be provided.</p> <p><b>Transport:</b> A design review of the signalised junctions should be undertaken. The proposed S.106 agreement and/or conditions should secure contributions towards car club membership for the residential units, the provision of electric vehicle charging points, a car park management plan, a delivery &amp; service management</p>	<p>Noted: Temporary play provision to be included within the phasing plans secured by condition.</p> <p>Noted: Scheme has been amended substantially. However, conditions added in relation to the pedestrian links.</p> <p>Noted:</p> <p>Noted:</p> <p>Noted:</p>
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	plan, residential travel plan, and construction logistics plan.	
Environment Agency	Application falls outside of their remit and therefore no comments to make.	Noted.
Transport for London	<p><b>Access:</b> The existing vehicle junctions into the site from Dudley Road and Shaftesbury Avenue are considered satisfactory to serve the development.</p> <p>The existing cycle and pedestrian access, in conjunction with the proposed enhancements would be satisfactory.</p> <p><b>Car Parking:</b> Proposed quantum of car parking broadly equates to 0.47 spaces per dwelling. A small number of spaces would relate to the community use, with details of how this is to be allocated required. Car Park Management Plan (CPMP) would be required.</p> <p>Permit restriction through S.106/CPZ</p> <p>10% of parking would be accessible, equating to 54 spaces. Details to form part of CPMP.</p> <p>Welcomes car club provision for future residents</p> <p><b>Trip Generation &amp; Impacts:</b> The trip generation assessment shows that the proposal will generate a net 118 car driver trips during the AM peak and 83 two-way car driver trips during the PM peak, which is a fairly sizeable increase on the existing. The modelling performance data submitted indicates that the give-way junctions/roundabout in the</p>	<p>Noted: CPMP conditioned. Obligation received to undertake CPS survey and implementation if required.</p> <p>Discussed under Section 23.</p>

	<p>surrounding area will continue to operate with spare capacity following the developments and their traffic demand. However the signalised junctions of Shaftesbury Avenue and Roxeth Hill are likely to operate at slightly higher degrees of saturation, when the existing situation is already at full capacity, i.e. DoS of 95%-100%+. This would cause concern at managing the traffic flows in the area and we would look to the developers to undertake a design review at the double-junction in order to improve the network performance. Moreover there are several bus routes that traverse the junction and so we would be interested in exploring possible measures to mitigate journey time increases alongside the proposed network changes.</p> <p>In terms of impacts on the surrounding public transport services, the development is anticipated to generate 156 two-way trips during the AM peak and 103 two-way trips by public transport. The disaggregated net trips for rail/ underground trip generation are 107 two-way trips during the AM peak and 29 two-way trips in the PM peak. These trips are expected be mainly through South Harrow station. However, TfL is satisfied that no site specific mitigation is required.</p> <p>The disaggregated net trip generation for buses are 49 two-way trips during the AM peak and 34 two-way trips during the PM peak. Considering the number of bus services in the area, particularly several high frequency routes such as route 140, TfL is satisfied that the existing bus</p>	
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	<p>network will be able to accommodate the additional bus trips generated by the development.</p> <p>Based on the residential unit mix a total of 954 cycle parking spaces will be required, including short-stay cycle parking for visitors to the residential element. Additionally, the proposal includes cycle parking for the proposed community use, which will be provided at ground level within the landscaped "village green". The level of cycle parking for the community use is considered satisfactory on the basis that it accords with the requirements of the London Plan.</p> <p><b>TFL requested Conditions:</b> Construction Logistics Plan (CLP) Delivery and Servicing Travel Plan</p> <p><b>Summary</b> TfL considers the proposal to be compliant with London Plan Policy 6.13 and therefore acceptable, subject to the recommended legal agreements relating to car parking and management, electric vehicle charging points, car clubs, cycle parking, travel planning, delivery and servicing and construction logistics being secured by legal agreement.</p>	<p>Noted:</p> <p>Noted:</p>
Transport for London Second Consultation.	<p>The amended plan seeks to increase the overall amount of residential units from 549 to 574 units: Because the net change (25 additional units) is small, entail. TfL considers the previous initial comments made still stand and should be reported, subject to the addition of the following comments.</p> <p><b>Car Parking</b> TfL notes that the proposed level of</p>	Noted: Discussed under Section 23

	<p>residential units is raising the amount of car parking is not, thus equates to 0.45 spaces per dwelling, this is welcomed by TfL. This is in line with the Draft New London Plan, policy T6.</p> <p><b>Cycling</b> The applicant should provide an extra 96 long stay cycle parking spaces to meet the new draft London Plan policy T5, which should be located in a secure, sheltered and accessible location.</p> <p>It is reminded that new developments must take every opportunity to overcome barriers to cycling for their prospective residents and for visitors. Good quality cycle parking is a selling-point. Planning obligations should be used not only for quantitative purposes but, also to ensure that it is of high quality: well located, secure, visible, well overlooked and fit for purpose. Developers have much to gain from making cycling an integral part of their transport strategy and should be encouraged to approach the issue positively.</p> <p>TfL requests that any transport mitigation that has been secured as part of the original application should be re-secured to ensure that there will be no adverse effects on the transport network, in and around the Grange Farm area.</p>	
Transport for London: London Underground	No Comment to make	Noted
RAF Northolt	The MoD retain its objection on the amended scheme, as they have stated that Block C within the full planning permission element and some Blocks within the Outline element would exceed height tolerances.	Noted: The applicant is in negotiation with the MoD to overcome the objection. The outcome will be presented to the Planning Committee.
Metropolitan Police (Secure By Design)	The applicant has been in on-going discussions with the MeT	Noted.



	throughout the pre-application stage. The proposed development has incorporated the security and safety features recommended by the MeT.	
Historic England	No Comment to make	Noted
Heathrow Airport	<p>No safeguarding objections to the proposed development.</p> <p>Makes the following observations: Wind turbines can impact on the safe operation of aircraft through interference with aviation radar and/or due to their height. Any proposal that incorporates wind turbines must be assessed in more detail to determine the potential impacts on aviation interests.</p>	<p>Noted</p> <p>Noted: The sustainability &amp; Energy report has ruled out any use of wind turbines in achieving renewable resources on site.</p>
Thames Water Utilities	<p>No Objection; but the following comments / recommendations.</p> <p>Waste Comments: Non-Return Valve (or similar device) to prevent backflow during storm surge.</p> <p>Surface Water Drainage: Storm flows should be attenuated or regulated into the receiving network;</p> <p>Public sewers are crossing or close to the development. Thames Water must have access to these retained for maintenance etc.</p> <p>No piling shall take place until a piling method statement and been submitted to and approved in writing by the LPA in consultation with Thames Water.</p> <p>We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the</p>	<p>Noted: Relevant conditions have been recommended.</p>

	public sewer.  Thames Water do not object to the application with regard to Sewerage infrastructure capacity.	
Affinity Water	No Comment Received	Noted
Harrow Hill Trust	No Comment Received	Noted
Waitrose	<p>Commented on both the original scheme and the amended scheme.</p> <p>More detail is required regarding the new entrance that would be created into its car park from the site, which would be between proposed block Plot 6 &amp; 7.</p> <p>The proposed development should not increase flood risk onto the Waitrose site.</p>	<p>Noted: A condition has been recommended with regard to the walkways from the site into Waitrose.</p> <p>Noted: A condition has been recommended with regard to further flood risk detail</p>
<b>Neighbouring Boroughs</b>		
London Borough of Brent	No Comment Received	
London Borough of Ealing	Raises No Objection to the original scheme or the amended version.	Noted
London Borough of Hillingdon	No Comment Received	

#### 4.18 Internal Consultation

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

<b>Consultee</b>	<b>Summary of contents</b>	<b>Officer Comments</b>
LBH Design	<p>The application has been considered by an independent Design Review Panel and has looked to address the comments received in that forum.</p> <p>Proposed Urban Design &amp; Layout is legible and well laid out.</p>	<p>The comments provided by the Urban Design Officer are noted. Specific points will be covered within the Officers Report</p>

	<p>The prominent roof forms are an important characteristic of the development, derived from the local vernacular to replicate exact types and angles found in Metroland surrounding the site. Gable roof forms give the development a distinctive characteristic that is both contemporary and sensitive to Harrow's architectural heritage.</p> <p>Three types of buildings have been developed to respond to edge conditions and define different character areas within the development. This strategy was supported at DRP and is successful in moderating the scale of the development. Design officers are of the opinion that all three building types demonstrate high quality architecture.</p> <p>A simple palette of high quality brick and hung tiles has been proposed throughout, referencing materials used in Metroland architecture around the site. Subtly different brick and tile types and colours are proposed, to define building characters, and provide variety across the site. The use of high quality materials and details will be key to the success of the development.</p> <p>A reduction in the amount of open space is proposed in the scheme, however design officers are of the opinion that the quality and definition of the open space proposed would significantly improve usability of the landscape.</p> <p>Interiors of houses and blocks are well laid out, and the majority of flats are dual aspect. Front doors and kitchen windows look out onto streets, providing passive surveillance and animating the public realm. There is natural light to all cores and the internal details of communal entrances and hall spaces have been specified</p>	Discussed under Section 10
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	<p>In summary, the design of the proposed development was supported by the DRP (2016), and any concerns raised by the panel have been successfully addressed in the application. Harrow design officers are of the opinion that the proposed scheme is an exceptional example of estate regeneration. It has potential to be a precedent for a new Harrow vernacular and improve the standard of architecture across the Borough</p>	
LBH Design: Second consultation	No Comment on amended scheme received.	
Design Review Panel: Second Consultation	<p><b>General</b> The revised scheme is an improvement in terms of hierarchy of spaces and the quality of the residential units. The increase in dual aspect units is welcomed. There is now the opportunity to re-evaluate decisions made in the original scheme and to test previously discounted ideas.</p> <p><b>Massing and Layout</b> Shaftesbury Avenue block: The 6 storey block on Shaftesbury Avenue is unresolved. The shift in scale from the three storey houses to the block is awkward, and the approach to turning the corner needs to be refined. This block will be part of the detailed application, so it's important that it's of a very high quality</p> <p>Block mass: The introduction of deck access is positive. However, there are areas of the scheme where the reduction in volume appears to be restricting the site layout. There is potential to include some larger, double loaded corridor blocks, to release the pressure on the rest of the site. This would also support the creation of a clearer hierarchy of spaces.</p> <p>Permeability: The Panel</p>	<p>This block has been revised again in response to the comments from the DRP, and attempt has been made to make the step up from the two storey element facing Shaftesbury Avenue to the 5/6 storey element. Discussed further under Section 10</p> <p>Noted. Double loaded corridors could come forward in a subsequent Reserve Matter Application.</p> <p>Noted: Restrictions</p>

	<p>understand the constraints that the MoD related issues have placed on the scheme. However, it is disappointing that much of the permeability has been lost. The internal courtyards feel closed off - are there opportunities to open these up further, with routes and views through them?</p> <p><b>Architecture</b></p> <p>Character: The character of the revised scheme is not defined yet, it is neither urban nor Metroland - different areas of the scheme could have different characters. The Shaftsbury Avenue block, in particular, does not have a clear identity. As mentioned above, it is vital that care is taken to define the architecture of this block, since it is part of the detailed application.</p> <p>Roof: The Charles Ginner roof-scape reference is strong. It is a shame that this has largely been lost in the revised scheme, where the roof forms appear very urban. The roof of the Shaftsbury Avenue block needs further work; it is currently a hybrid of a Metroland/urban form. Amending certain blocks to increase their mass and number of apartments will relieve pressure in the roof form.</p> <p><b>Landscape and Public Realm</b></p> <p>Village Green: The concept of the Village Green is good and has potential to offer a useable amenity space for the existing and new community. However, it is unfortunate that so much of the space has been lost to parking, play, and hard-landscaping (particularly around the community centre), and there is a very small amount of actual green space left. Does the location of the Village Green still work now that the project has been redesigned? Opportunities to increase the amount of green space should be looked at, and a more centrally</p>	<p>imposed by the MoD have to a large extent dictated the current design. Furthermore, GLA design officers promoted the closing off of these blocks.</p> <p>Noted: Again, the design has been driven by the restrictions placed on the development by the MoD, which has impacted on the height. Coinciding with this is that the site is Open Space (so there is a resistance to the loss of this), and the financial implications. These implications have resulted in the quantum of housing needed, having to be arranged in a development that may not have the clearly defined design rationale as previous, however, with good quality materials (secured in the Design Code), would continue to provide a high quality development within the wider area.</p> <p>Noted: There is concern that the balance between hard and soft landscaping is not satisfactory. However, it is noted that there is scope to redress any potential imbalance, especially with regard to dedicated play space. However, there is little scope to make alterations to the parking on site, as this is considered optimum by Transport for London and the Highways Authority. A condition is imposed in relation to a</p>
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	<p>located space may provide potential for an enlarged green area.</p> <p>Access: In general shared space is too generous and wide, and this should be reduced. The visibility and legibility of vehicle routes also requires improvement. A more detailed explanation of entrances and access to the site would be helpful.</p> <p>Shaftesbury Avenue entrance: The entrance from Shaftesbury Avenue is important, and the landscaped space needs to be shown in detail including all the existing and proposed trees and relationship of the landscaping to parking.</p> <p>Topography: The existing topography and long views across the landscape are a special quality of the existing site. The closed nature of the courtyards has reduced the potential for this, and opportunities for opening up longer views should be looked at.</p> <p>Courtyards: The proposed mix of tenures and residents grouped around a shared courtyard space can be problematic. Residents will have conflicting requirements for the space, and the reality of this arrangement can be difficult.</p> <p><b>Community Centre</b> More detail is needed to understand how the community centre will work. Will it really be a building in the round? If so, this needs to be pushed further e.g. how does the barn concept relate to the public realm, will it have large openings onto the Village Green? It's important that this is fully active all the way round in order to avoid part of it being fenced off.</p> <p><b>Parking</b> The level of car parking is a concern. There is a significant amount of on-street parking, which</p>	<p>revised landscaping plans / strategy.</p> <p>The internal highway network is proposed to be constructed to adoptable standards, and the Highways Authority have concluded they do not raise any safety issues.</p> <p>Noted:</p> <p>Some long views are still retained throughout the site. As mentioned above, the closing of courtyards is something all but imposed by reason of MoD and GLA.</p> <p>Noted:</p> <p>Noted: the Design Code has been amended to take into consideration the points made. Any Reserve Matters application would have to come forward and demonstrate compliance with this approved document.</p> <p>A revised Landscape Plan is considered reasonable in terms of achieving a better</p>
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	<p>makes the public realm appear very 'hard'. The relationship between parking and public realm needs to be better resolved. It is also unclear how the parking will be managed, and the Panel would support the formation of a post construction CPZ.</p> <p><b>Summary</b> The design team gave an excellent presentation, and it is evident they have conducted a rigorous design process in the best interests of both the existing tenants and future residents. This is a very important scheme for Harrow and it is clear the design team are fully aware of this. The landscape and architecture need to be of the very highest quality and it will be important to preserve the elements of the development which will set the scheme apart.</p> <p>In moving from the previous scheme, the Panel question whether enough has yet been done to examine some of the new conditions. Some areas feel constrained - would double loading specific blocks loosen up the layout and reduce pressure on different parts of the scheme? The revised design is far more urban and it would be worthwhile to push the suburban character further, in particular the roof-scape. There are several elements which could be improved –of which the Shaftsbury Avenue block is arguably the most challenging, and one of the most important. In addition, it will also be important to have a clear strategy for phasing and a well-structured decant plan.</p>	<p>balance in terms of soft landscaping, however, there is limited scope to reduce the amount of carparking on site. A contribution is sought for a CPZ study and its implementation if required.</p> <p>Noted:</p> <p>Noted: The applicant has put the design of the scheme through rigorous testing. It is noted that the proposal has a number of restrictions placed on it; MoD height restriction, Open Space Land, and viability (re-provision of affordable habitable floorspace) and how the scheme is paid for through private sale (with some grant funding). These factors have led to the final design, and on balance it is considered that the proposed scheme is acceptable.</p>
Policy & Research	<p>No Objection:</p> <p>The scheme would secure the comprehensive redevelopment of the Grange Farm Estate, and in principle is supported given the regeneration it will achieve on this</p>	<p>Noted</p>

	<p>site and the wider area.</p> <p>With regards to this uplift in units, it is noted that these will all be for private sale. Core Strategy CS1 seeks to achieve the maximum viable affordable housing on site, with a borough wide target of 40%. This uplift would not provide any, but this is in the context of this uplift paying in effect for the replacement of the existing units. Given this Policy would concur that the maximum viable amount of affordable housing is being provided on this site, and that the provision of new, replacement affordable housing will achieve wider regeneration benefits, including securing the future of the stock within this area through new build, highly energy efficient dwellings.</p> <p>The provision of new community floorspace to serve this community is supported and in accordance with DM Policy 46.</p> <p>There will be a small net loss of open space within this site. DM Policy 18 supports open space reconfiguration, but seeks no net loss. However, this reconfiguration would provide not just amenity open space, as is currently the case, but also new sport and play typologies of open space. Harrow's PPG17 study identifies a deficiency in this type of open space within this area, and therefore this proposal will not only improve the quality of the amenity space on site, but will help address other open space typologies deficiencies, providing an overall qualitative benefit to the existing and new communities of this site, and the wider area. Additionally DM Policy 19 supports major new development where open space is provided that enhances existing open space, and meets the needs of the occupiers and helps address existing identified deficiencies. This</p>	
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	<p>proposal meets all of these objectives, particularly with regards to play space and meeting the requirements for different types of play space for the likely child yield of the development. Therefore on balance, whilst there is a net loss of open space, the qualitative improvements to the re-provided open space, and the addressing of existing deficiencies through the provision of other typologies of open space, make this aspect of the scheme acceptable, and there are no Policy objections to this.</p> <p>The provision of on-site communal CHP is supported in accordance with the London Plan requirements.</p>	
Highways Authority	No Objection. The submitted information in support of the application appears reasonable	Noted: Detailed under Section 23 of the report.
Drainage Authority	No Objection. Conditions are required.	Noted: Discussed under Section 16 and relevant conditions applied.
Landscape Architect	Comments summarised that there is significant concern over the balance between hard and soft landscaping on the site. Furthermore, a number of species, and their propose locations within the site are inappropriate.	Noted: Discussed under Section 10 and relevant conditions applied.
Arboricultural Officer	No Objection: However, notes and agrees with the issues raised above the Landscape Architect.	Noted.
Economic Development	<p>No Objection:</p> <p>Request obligations in relation to employment and training, and a construction training program.</p>	<p>Noted.</p> <p>A S.106 agreement cannot be entered into as the Applicant is the Local Authority. However, obligations are listed at the front of the report which is clear for</p>

		members to view. Furthermore, the internal nature of the application allows some discussion between the applicant and Economic development to secure the requirements.
Waste/Refuse Officer	No Comment received.	
Housing Officer	The development is submitted by the Housing Department.	
Biodiversity Officer	Objects to the scheme in its current form. Similar comments to the Landscape Architect, and noted below within the report.	<p>Noted: Discussed under Section.</p> <p>It is noted that a condition has been sought to seek a better balance between the soft and hard landscaping, which would assist in increasing the onsite enhancements. Furthermore, an obligation would be entered into for further assessments to be undertaken, with a potential off-site contribution required if the enhancements are not satisfactory.</p>
Environmental Health	No Objection in principle. However, further information requested regarding Air Quality prior to be able to support the application.	Noted: Information sought from applicant, with resulting information to be presented to Planning Committee
Conservation Officer	The application has not undertaken a views assessment of its potential impact on Nearby heritage assets such as the Roxeth Hill Conservation Area and locally listed building façade.	The revised application is much lower than the original scheme, and would largely sit below the buildings fronting onto Northolt Road (which sit between the application site and the conservation area.)

		It is noted that the application is not subject to any protected views.
Met Police Crime Prevention Officer	The design has incorporated all security and safety features that have been recommended prior to submission of the application. However, it is requested that a condition of further details is attached to any permission.	Noted. Discussed elsewhere within the report.

## 5.0 **STATEMENT OF COMMUNITY INVOLVEMENT**

- 5.1 Chapter 66 of The NPPF places an expectation upon applicants to work closely with those directly affected by proposals, to evolve designs and take account of the view of the community. It goes on to state that proposals that have demonstrably evolved, taking community input into account should be looked upon more favourably. London Plan 2016 (Chapter 1.45) supports this, fostering a consensual approach that emphasizes engagement, involvement and consultation on all sides.
- 5.2 Prior to the submission of the current planning application, the applicant engaged in consultation with the existing residents of Grange Farm, and also with neighbouring residents to the estate.
- 5.3 Consultation with the existing residents commenced in 2014 to advise residents the desire to progress the regeneration of the Estate. From these early meetings, the constraints were made clear with regard to the funding the need for social housing and the practicalities of having no available space to commence the new buildings without first demolishing some of the existing housing stock.
- 5.4 In the Autumn of 2014, a steering group was formed of volunteers living within the existing estate, who were then advised on the mechanics of regeneration and housing funding. Following an interview process in February 2015 (by the steering group) an Independent Tenant Advisor was appointed to assist the steering group.
- 5.5 Since May 2015, some 22 community engagement events have taken place prior to the submission of the application. Issues discussed related to; architects appointment, design, consultation on the community centre, housing decant, energy strategy, preparation of the neighbourhood agreement, highways and transport issues, design review, landscaping, play areas, youth engagement etc. The following are the selected key community engagements that have taken place;
- Formal design development and planning commenced in May 2015 with an event to select the Architect, which was attended by 40 residents. Members of the Steering Group were invited to interview the architects.
  - On the 19<sup>th</sup> September 2015 an open house, attended by approximately 60 – 70 residents was held. transport routes and linkages review, a historic

exhibition and tour of the site took place.

- On 21 September 2016 a second public consultation took place, with over 2000 people invited. This included invitations to local residents, local businesses, schools and religious groups. Letters and flyers were sent out. Approximately 100 residents attended the engagements, with the Architects, Planning Consultant, and M&E Consultants presenting the latest design plans and answering questions.
- On the 28<sup>th</sup> June 2016 a final pre-submission exhibition was held to present the final design prepared for submission.
- Post objection from the Ministry of Defence (RAF Northolt), the proposed scheme was subsequently revised. Four consultation events were held in 2017, with both the Residents and the Residents steering group. In addition to this, regular newsletters have been made available to residents and interested parties.

- 5.6 Over the course of the consultation process, the feedback was noted as being generally positive. As a result of the feedback on various matters, amendments were made to the scheme including; the master plan, phasing strategy, parking and bin provisioning, unit types and forms, compositing of the community centre, evolution of the landscaping and open space strategy.
- 5.7 During each of the community engagements a record was kept by the applicant with regard to the response received in relation to each of the key issues raised. Within the supporting Community Stakeholder Document, a number of tables are provided which detail the number of responses, and where it has been possible to incorporate these into the scheme. Lastly, a graph (Page 18 of 19) has been provided to gauge the overall scheme, and the if based on the plans/information, that the key matters raised have been satisfactorily addressed. Whilst it is acknowledged that in almost all instances there has been some responses that disagree that each of the matters have been met, it is clear that the majority of responses on each of the main points have been achieved.
- 5.8 It is considered that the applicant and design team have entered into on-going dialogue and consultation with those most directly affected by the proposal, namely the existing residents of Grange Farm. The provision of a steering group enabled a coordinated group of resident, aided by an independent advisor, to put across in a legible manner the concerns and aspirations of the residents of the estate.
- 5.9 The applicant has also provided open forums for members of the wider public to be included within the pre-application consultation process. Over 2000 flyers/letters were delivered to invite residents within proximity of the application site to attend public forums to make comments. Lastly, local elected members, schools, religious groups and businesses have also been consulted.
- 5.10 In line with the above, it is considered that the applicant has provided an inclusive process, enabling those most directly affected by the proposal, being the existing residents, and those within close proximity to the site, to be involved within the process. Where possible, the scheme has reflected the comments raised throughout the consultation process, although, it must be acknowledged that this is not always possible. As such, it is considered that the requirements as set out

within the NPPF and the London Plan (2016) have been met.

## **6.0 Environmental Impact Assessment (EIA)**

- 6.1 The proposed development is considered not to be EIA development within the meaning of The Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 (as amended).
- 6.2 On 12<sup>th</sup> February 2016 the applicant made a request for a screening opinion under the above regulations. The Council issued a scoping response on 16<sup>th</sup> May 2016 (P/0690/16). It concluded that the development was considered not to be a development that triggered the thresholds, and therefore did not require an Environmental Impact Assessment to accompany it.
- 6.3 It is noted that there have been amendments to the scheme, insofar as the design and appearance. However, there has been little change to the intensity of what is proposed, insofar as unit numbers, vehicle parking, and the community centre. Therefore it is considered that notwithstanding the amendments to the scheme, the proposed would still not trigger an Environmental Impact Assessment.

## **7.0 POLICIES**

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

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

- 7.2 In this instance, the Development Plan comprises The London Plan 2016, The Harrow Core Strategy 2012 [CS], Harrow and Wealdstone Area Action Plan (AAP) 2013, the Development Management Policies Local Plan 2013 [DMP], the Site Allocations Local Plan SALP 2013 [SALP].
- 7.3 While this application has been principally considered against the adopted London Plan (2016) policies, some regard has also been given to relevant policies in the Draft London Plan (2017), as this will eventually replace the current London Plan (2016) when adopted and forms part of the development plan for the Borough.
- 7.4 The document has been published in draft form in December 2017. Currently, the Mayor of London is seeking representations from interested parties/stakeholders, before the draft Plan is sent to the Secretary of State for Examination in Public, which is not expected to take place until the summer of 2019. Given that the draft Plan is still in the initial stages of the formal process it holds very limited weight in the determination of planning applications, and this position accords with the NPPF in relation to giving weight to emerging plans (para 216).
- 7.5 Notwithstanding the above, the Draft London Plan (2017) remains a material planning consideration, with relevant policies referenced within the report below and a summary within Informative 1.

## **APPRAISAL**

The main issues are:-

- Principle of the Development
- Regeneration
- Housing and Residential Quality Considerations
- Affordable Housing
- Housing Density and Unit Mix
- Residential Quality of Proposed Development
- Amenity of Neighbouring Occupiers
- Design, Character and Appearance of the Development and Area
- Landscaping
- Flood Risk & Development
- Carbon Dioxide Emissions Reduction
- Sustainable Design and Construction
- Decentralised Renewable Energy
- Ecology and Biodiversity
- Land Contamination and Remediation
- Aeronautical
- Transport & Parking

### **8.0 Principle of Development**

#### **National Planning Policy Framework (2012)**

- 8.1 The National Planning Policy Framework (NPPF) was published by the Government in 2012 as a streamlined replacement of the previous suite of national planning policy statements and associated publications. For decision making purposes, although the NPPF is not a 'development plan' document, it is a material consideration.
- 8.2 The NPPF was taken into consideration as part of the examination-in-public of Harrow's Core Strategy, prior to the adoption of the Strategy in 2012, and informed the preparation of Harrow's other Local Plan documents prior to their adoption in 2013. Both the Core Strategy and the other Local Plan documents are therefore fully in accordance with the principles and policies of the NPPF.
- 8.3 The NPPF describes the pursuit of sustainable development as involving improvements to people's quality of life and to the quality of the built, natural and historic environment. At the heart of the NPPF is a presumption in favour of sustainable development. For decision making purposes this means approving development proposals that accord with the development plan without delay.

#### **London Plan (2016)**

- 8.4 In recognition that population growth in London is likely to be significantly above that which was anticipated in the original 2011 version of the Plan, and informed

by new evidence<sup>1</sup>, the 2016 London Plan adopts an annual London-wide housing target<sup>2</sup> for the new plan period 2015-2025 of 42,389 p.a. (up from 32,210 p.a. for the period 2011-2021) of which Harrow's annual target for the new plan period is 593 p.a. (up from 350 p.a. for the period 2011-2021). As with the original 2011 Plan, the targets contained within the 2016 London Plan fail to reconcile a potentially significant gap between household growth projections and the identified availability of land for new housing, meaning that the targets continue to be expressed as minima. There must be, therefore, a renewed emphasis on all boroughs meeting and exceeding their housing targets.

## **Harrow Core Strategy (2012) and the Harrow Development Management Policies Local Plan (2013)**

### **Provision of Housing**

#### *Spatial Strategy*

- 8.5 The adopted National Planning Policy Framework [NPPF] has brought forward a presumption in favour of "sustainable development". The NPPF defines "sustainable development" as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The NPPF sets the three strands of sustainable development for planning to be; to play an economic, social and environmental role. The NPPF, following the deletion of the Planning Policy Statements and Guidance Notes, continues to encourage the effective use of land by reusing land that has been used previously, recognising that "sustainable development" should make use of these resources first.
- 8.6 Harrow's Core Strategy establishes a clear vision for the management of growth in the Borough over the Local Plan period (to 2026) and a framework for development in each district of the Borough. Policy CS1(A) directs growth to town centres and strategic, previously-developed sites and provides for that growth to be managed in accordance with the sub area policies. Policy CS2 C commits the Council through the Area Action Plan to *'identify and allocate sufficient sites to deliver a minimum of 2,800 net new homes over the plan period, giving further clarity to the mix and density of housing, along with the quantum of other appropriate land uses to be achieved on individual sites. Particular attention will be paid to the scale and form of development on sites at the edge of the intensification area, ensuring these achieve effective transition, especially where they neighbour open space or low density suburban residential areas'*.
- 8.7 The proposed scheme would find favour with the London Plan 2016 in terms of housing contribution. Currently the site provides for 282 units that are of a poor quality. The proposed development would demolish all of these existing units, and through a comprehensive redevelopment, provide for 574 new dwellings across the site. The new housing would be made up of 241 affordable units, and 333

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<sup>1</sup> The GLA's 2013 Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). For a full explanation of London's housing requirements, see paragraphs 3.14A-3.19A of the London Plan (2016).

<sup>2</sup> See Table 3.1 at Chapter 3 of the London Plan (2016).

units for private market sale. The uplift in housing numbers within the site would be supported. This would make a valuable contribution to the housing stocks of the Borough. Not only is it positive that the proposed development would result in an increase to the Boroughs housing stocks, it would also provide differing tenures. This is strongly supported as it would assist in providing mixed and balanced communities.

- 8.8 As mentioned above, there would be a mix of affordable housing and private sale across the site. Essentially, the Mayor of London would resist any loss of affordable floor space from the site. The proposed application has ensured that there would be no net loss of affordable floor space, with the remaining residential floor space being made of market sale, which is required to provide a significant contribution to the funding of the development. The appropriateness of the residential accommodation on site and the tenure mix is discussed later within this report.

### *Decant Strategy*

- 8.9 As mentioned previously, the proposed development would result in the comprehensive development of the entire site, which would be carried out over three phases. The current site is a housing estate, and as such many of the dwellings on site are occupied. Accordingly, a decant strategy must be implemented to ensure that existing occupiers are provided accommodation during the phase that impacts on their respective accommodation. Such developments can have a considerable impact on the lives of the existing residents through a range of matters, and specifically the relocation of occupiers from the site and then their eventual return. As mentioned previously, the applicant has carried out significant consultation with the existing occupiers of the Grange Farm Estate, which covered a range of matters including design, transport, housing types and also Decant Strategy. Over the period of the planning application process (from first submission), the Decant Strategy has evolved over time. A residents charter is in place which sets out clearly the process, the support available and compensation amounts. A Decant and Rehousing Officer has been appointed to assist tenants throughout the process. The following table provides a breakdown of how the phasing and demolition would be carried out on site.

Phase	Demolition
Phase 1	<ul style="list-style-type: none"> <li>• 1 – 45 Grange Farm Close (Blocks C, B, A, G &amp; H)</li> <li>• 1 – 18 Osmond Close (Blocks F &amp; E)</li> </ul>
Phase 2	<ul style="list-style-type: none"> <li>• 46 – 90 Grange Farm Close (Blocks I, J, K, L &amp; M)</li> <li>• 19 – 27 Osmond Close (Block D)</li> <li>• 1 – 63 Wesley Close (Blocks N, O, P, Q, R, S, and T)</li> <li>• 28 – 39 Osmond Close (Blocks 1 – 2)</li> </ul>
Phase 3	<ul style="list-style-type: none"> <li>• 40 Osmond Close (Blocks 3 – 4)</li> <li>• Bungalows (Osmond Close)</li> <li>• 66 – 75 Osmond Close (Genesis properties)</li> <li>• 109 – 118 Wesley Close (Genesis properties)</li> <li>• 64 – 108 Wesley Close (Blocks U, V, W, X &amp; Y)</li> </ul>



	• Community Centre
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- 8.10 The evolution of the Decant Strategy in terms of Phase 1 of the development, would now result in only 11 tenants being required to be re-housed. Additionally, these tenants are able to be re-housed within vacant dwellings within the Grange Farm Estate. However, where housing needs are unable to be met within the estate, off-site provision will be facilitated.
- 8.11 Secure tenants in phases 2 and 3 (existing) will be rehoused in new homes on Phase 1 and 2 on completion. This phasing plan will result in the majority of remaining secure tenants only having to move on one occasion.
- 8.12 At the time of writing this report, there are currently 114 secure tenants remaining, of which 11 are on the Phase 1 area. As secure tenants on Grange Farm Estate are rehoused, the void properties are used as temporary housing for homeless families pending demolition. The intention is that flats should be void for a minimum period of time and ideally no longer than 6 months prior to demolition. Of the occupied flats within the Phase 1 area there are still 3 non-resident leaseholders. There are 7 properties to be repurchased in Phase 2 and 6 in Phase 3.

#### *Pedestrian and Vehicular Access*

- 8.13 It is the council's intention to maintain pedestrian and vehicular access to the whole estate during demolition and construction of the three phases. A full construction management plan will be worked up post-application and will provide a detailed pedestrian and vehicular access strategy with associated management measures through all construction phases.
- 8.14 The applicant has submitted a Decant Strategy which aims to carry out the minimal amount of relocations, both in terms of existing dwellings and also the amount of movements. The Decant Strategy also seeks to ensure that the occupiers within the site, whilst outside of a phase of development, are able to continue to utilise the site in much the same way as possible. It is therefore considered that the Decant Strategy is sound, and would ensure that the proposed phased development would cause the least amount of disturbance to the existing residents on site as possible.

#### *Open Space Provision*

- 8.15 The application site is identified locally as Open Space within the development plan.
- 8.16 Policy 7.18 of the London Plan (2016) resists the loss of open space unless equivalent of better quality provision is made within the local catchment area.
- 8.17 Policy CS1.F of the Core Strategy (2012) seeks among other things to protect the quantity and quality of open spaces from being eroded by inappropriate uses or insensitive development. However, it is also highlighted within the Core Strategy under CS3 that the Council will support proposals which achieve physical renewal and estate regeneration objectives at Grange Farm. To this end, there would

appear to be some conflict between the objectives of the Core Strategy, in resisting any loss of open space, whilst supporting the renewal of the estate.

8.18 Policy DM18 (Protection of Open Space) of the Harrow Development Management Policies (2013) [DMP] sets out a presumption against the release of Open Space for development and states that proposal which would have a harmful impact on Open Space would be resisted. It goes on to state that the reconfiguration of land identified as open space will be supported where;

- a. The reconfiguration is part of a comprehensive, deliverable scheme;
- b. There would be no net loss of open space
- c. The reconfiguration would achieve enhancement to address identified deficiencies in the capacity, quality and accessibility of open space, and it would secure a viable future for the open space; and
- d. The reconfiguration would not be detrimental to an environmental function performed by the existing open space.

8.19 Policy DM19 seeks major new residential developments to make provision of new open space, or enhancements to existing open space that meets the needs of the occupiers of the development. Furthermore, such developments would be supported where they contribute to the mitigation of identified deficiencies on the quantity, quality and accessibility to open space.

8.20 Supplementing the requirements set out above within DM18, Harrow Council undertook a PPG17 study. This study identified the typologies across the borough where there were shortfalls. Harrow's PPG17 study identifies a deficiency in this type of open space within this area, and therefore this proposal will not only improve the quality of the amenity space on site, but will help address other open space typologies deficiencies, providing an overall qualitative benefit to the existing and new communities of this site, and the wider area. Additionally DM Policy 19 supports major new development where open space is provided that enhances existing open space, and meets the needs of the occupiers and helps address existing identified deficiencies. This proposal meets all of these objectives, particularly with regards to play space and meeting the requirements for different types of play space for the likely child yield of the development.

8.21 The proposal would result in a reconfiguration of the site with an overall net loss of open space within the site due to the comprehensive redevelopment of the site. Currently, the Grange Farm Estate has an overall area of 14,829sqm, which is made up of 14,444sqm of amenity space and 385sqm of play space. The open space across the site which is available for amenity space is of a poor quality. As a result of the poor quality and relationship to the housing stock on the site, there is a lack of definition and ownership of this land. As such, the existing open space set aside for amenity space is underutilised. One 'one size fits all' play space is provided for the entire site. Again, this element is of poor quality and not suitable for all age groups of children that are present on the current estate.

8.22 Whilst it is acknowledged that there would be a loss in the overall quantum of open space across the site, which is resisted by the Core Strategy (2012), it is acknowledged that a degree of loss could not be avoided in regenerating the site.

Again, the Core Strategy is supportive of the regeneration of the site. As such, the scheme has been developed to limit any loss of open space from the site. In conjunction with ensuring the least amount of loss of the open space, ensuring that the remaining open space is useable, functionable and successful is critical.

- 8.23 Notwithstanding the above, it is clear that the proposal would fail to accord with Policy DM18B (a&b) insofar as it would lead to reduction in the amount of open space, rather than just a reconfiguration. Notwithstanding the loss of the open space on the site, it is necessary to quantify the harm (or benefit) arising from the shortfall. Firstly, it is noted that in terms of DM18B(c) the development should achieve enhancement to address identified deficiencies in the capacity, quality and accessibility of open space, and it would secure a viable future for the open space.
- 8.24 Currently it is noted that site has a very poor quality of open space across the estate. The proposed development would comprehensively reconfigure the existing open space, albeit with a shortfall in capacity, which would provide for a much higher quality open space than existing. The proposed open space strategy put forward by the applicant seeks to increase the typologies of open space provided into several categories, which are; Parks and Gardens. Natural and Semi Natural Green Space, Amenity Green Space, and Play. Each of the categories would be clearly defined across the site, which is a vast difference from the non-descript and undefined open space on site currently. It is considered that notwithstanding the overall reduction in the quantity of the open space across the site, the proposed open space strategy would provide an increase in open space typologies. The increase in the typologies is considered to be an improvement in the quality of the open space on site for the use of future residents, and goes some way to addressing deficiencies in open space typologies identified within the PPG17 study. Lastly, the comprehensive landscape strategy for the site would ensure the viable future of the open space. In this aspect, the proposed development would find favour with policy DM18B(c).
- 8.25 As mentioned above, the existing open space is predominantly set out as amenity space. This includes predominantly grassed areas with a number of well-established trees. Many of these trees are of a high quality. Again, it is acknowledged that there would be a removal of a number of these trees and a loss of the grassed areas. Policy DM18B (d) seeks to ensure that any reconfiguration of open space would not be detrimental to the environmental function of the existing open space. Lastly, the proposal would find favour with Policy DM19, as it would both enhance the open space that is located on the site, and also provide opens space typologies that are deficient within the Borough.
- 8.26 As part of the hybrid application, it is proposed provide a comprehensive landscaping programme for the site. The landscaping scheme would be implemented across the entire site, and would ensure the on-going success of the open space. The landscape strategy and proposed implementation of the remainder open space is discussed further below. However, it is noted that for the purposes of addressing DM18B(d), the proposed landscaping of the open space would include an enhancement of vegetation species across the site, designated allotment gardens, and also an extensive tree replacement methodology. It is

considered that the proposed landscaping would provide a much more successful environmental function than what the existing open space currently does. Accordingly, the proposed development would find strong support in line with this element of the policy.

### *Community Facility*

- 8.27 As part of the regeneration of the site, the development must also provide for a replacement community centre for the one that is currently located on site. Currently, the existing community facility on site is small in footprint, and has an awkward layout which prevents it being used as efficiently and effectively as it could be. Accordingly, this element within the site is relatively unsuccessful and as such the redevelopment of this element is encouraged.
- 8.28 Policy 3.16 of the London Plan (2016) seeks the protection and enhancement of social infrastructure. It identifies that London requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population. It goes on to state that development proposals should be accessible to all sections of the community (including disabled and older people) and be located within easy reach by walking, cycling and public transport. Wherever possible, the multiple use of premises should be encouraged.
- 8.29 Policy DM46 of the Harrow Development Management Policies Local Plan (2013) will support proposals for the refurbishment and re-use of the existing premises for community, sport and educational facilities. These will be supported where;
- a) They are located within the community that they are intended to serve
  - b) Subject to (a) they are safe and located in an area of good public transport accessibility or in town centres; and
  - c) There would be no adverse impact on residential amenity (see Policy DM1) or highway safety.
- 8.30 The proposed replacement community facility would be a multi-functional building, which would be required to provide specific parameters to meet the needs of the intended users of it. Fundamental to the success of the development is the improved pedestrian access from Northolt Road, which can only be delivered through the demolition of the existing air cadets facility. As part of this access arrangement, the proposed community facility within the site must provide dedicated space for this specific user. It is also envisioned that the nursery that utilises the existing community space would also be re-provided within the replacement facility. To a large extent, the specific requirements of these users have dictated the design of the building, whilst still ensuring the 'Barn Style' design rationale is retained. Alongside these users, the proposed community centre would also provide further space for other community users and also some play space.
- 8.31 The proposed replacement community facility would be located centrally within the site, and would re-house one existing user, and incorporate a user from land within the site that is critical to the success of the development. Stakeholder consultation carried out by the applicant with the existing residents of the estate

demonstrated that there was a desire for a community facility within the site. Given that the proposed quantum of the housing on the site is proposed to more than double, there would be a larger community within close proximity for which the community facility would serve.

- 8.32 Aside from the replacement of the community centre located within the Village Green, it is noted that the proposed access from Northolt Road would result in the demolition of the Air Cadets building. The proposed development would re-provide this facility within the Outline Permission element of the scheme. Proposed Block Q, which is adjacent to the access from Northolt Road and the Waitrose car park, would provide double height floor space on the ground floor. This area would be set aside for the Air Cadets, although the exact quantum of floor space has not been finalised. The re-provision of this floorspace has been the subject of protracted negotiations between the applicant and the Air Cadets, in an attempt to ensure that the re-provision is of a functional and useable space for the end user. Notwithstanding this, the floor space provided would be fit for purpose for the use of the Air Cadets.

### Conclusion

- 8.33 The proposed regeneration of the Grange Farm Estate, is able to be supported in principle. The proposed regeneration of the scheme would deliver the aspirations of the Core Strategy (2012), whilst providing a valuable contribution to the housing stock of the Borough. Whilst it is noted that the proposal would result in some decrease in the quantum of open space, it would provide a much higher quality and also go some way to mitigating identified open space and play spaces within the area. Lastly, it would provide enhanced social and community infrastructure by way of a replacement Community Centre.

### 8.34 Regeneration

The London Borough of Harrow published a Regeneration Strategy for 2015 – 2026. The objective of this document is to deliver three core objectives over the plans life, which include;

- **Place;** Providing the homes, schools and infrastructure needed to meet the demands of our growing population and business base, with high quality town and district centres that attract business investment and foster community engagement;
- **Communities;** Creating new jobs, breaking down barriers to employment, tackling overcrowding and fuel poverty in our homes and working alongside other services to address health and welfare issues;
- **Business;** Reinforcing our commercial centres, promoting Harrow as an investment location, addressing skills shortages, and supporting new business start-ups, developing local supply chains through procurement.

- 8.35 As part of the ability to regenerate across the borough, the Council will look at exploiting its own property assets. To this end, regenerating existing estate is earmarked as being able to deliver further homes to the boroughs stocks.

- 8.36 The comprehensive estate regeneration of Grange Farm would assist to overall aspirations of the regeneration of the borough. Firstly, the redevelopment would ensure both a higher quantum of housing towards the borough housing stocks, but would also significantly increase the quality of the housing within the estate. Along with the higher quality of the residential element of the redevelopment, it would also provide a high quality replacement community centre to the site.
- 8.37 The physical renewal and estate regeneration of Grange Farm Estate is also identified within the Harrow Core Strategy under Core Policy CS3(J) as being a proposal that would be supported by the Council. However, it is noted that the Core Strategy (2012) does not list objectives for the regeneration of this site.
- 8.38 The existing housing stock that is located on the site is an experimental 'resi-form' type of housing. The housing stock was built in the 1960s with an anticipated life of circa 30 years, and it now clear that the building stock is of a poor quality. Further, the poor layout of the internal highway network fails to provide a satisfactory level of permeability through the site, either for vehicle movement or pedestrian.
- 8.39 The existing low density residential accommodation that is located on the site, as mentioned, is of a poor quality. Furthermore, the quantum of housing within the site is relatively low, whereby failing to make an efficient use of the site. Located within the site is a community centre of circa 73sqm. This building is also of poor quality and has a layout that is not functionable for current users of the site. Lastly, the designated open space around the buildings is of a poor quality, and as a result is not used or has any sense of ownership from existing residents of the estate.
- 8.40 The proposed comprehensive redevelopment of the Grange Farm Estate would meet the aspirations of regeneration. The proposed redevelopment of the site would deliver a vast improvement to the quality of the housing stock on the site, which is currently of extremely poor quality. Furthermore, it would significantly improve the efficiency of the site, by providing much more dwellings onto the large site. It would provide a much improved community facility on site, which would assist in improving community inclusion and cohesion. In summary the proposed development would provide a better quality of built environment for future occupiers, with an improved access to the publically open space and play areas. Lastly, it would also provide for employment of local labour as part of construction programme.

## **9.0 HOUSING AND RESIDENTIAL QUALITY CONSIDERATIONS**

### **9.1 Affordable Housing**

#### **Affordable Housing Policy and the Proposal's Affordable Housing Offer**

- 9.2 The NPPF defines affordable housing as: social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Intermediate housing is defined as homes for sale and rent provided at a cost above social rent but below market levels.

- 9.3 London Plan Policy 3.12 *Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes* states that the maximum reasonable amount of affordable housing should be sought from individual proposals and that negotiations should take account of the circumstances of the proposal including viability. The policy also establishes a clear expectation that the proposal's affordable housing should be provided on-site; cash in lieu contributions should only be accepted where this would demonstrably further the Plan's affordable housing and other policies.
- 9.4 The London Plan's housing policies are supplemented by the Mayor's *Housing SPG* (2016). In relation to affordable housing policies, the tone of the SPG is to further emphasise the need for policies to be applied in a manner that maximises output and, having regard to viability, to encourage not restrain housing development.
- 9.5 Having regard to Harrow's local circumstances, Policy CS1 (J) of the Core Strategy sets a Borough-wide target for 40% of all homes delivered over the plan period (to 2026) to be affordable, and calls for the maximum reasonable amount to be provided on development sites having regard to the following considerations:
- the availability of public subsidy;
  - the need to promote housing choice;
  - the provision of family housing;
  - the size and type of affordable housing required;
  - site circumstances and scheme requirements;
  - development viability; and
  - the need to meet the 40% Borough-wide target.
- 9.6 In terms of tenure split, the strategic part of London Plan Policy 3.11 *Affordable Housing Targets* calls for 60% of affordable housing provision to be for social and affordable rent and for 40% to be for intermediate sale or rent.
- 9.7 In terms of dwelling mix, London Plan Policies 3.11 and 3.12 both make reference to the priority that should be accorded to the provision of affordable family housing<sup>3</sup>. A local target mix is published at Appendix 2 of Harrow's *Planning Obligations SPD* (2013). For social/affordable rent, the SPD target mix is:
- 1 bed 12%
  - 2 bed 48%
  - 3 bed 28%
  - 4 bed 7%
  - 5 bed 5%

For intermediate products, the SPD target mix is:

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<sup>3</sup> homes comprising 3 or more bedrooms.

- 1 bed 20%
- 2 bed 50%
- 3 bed 20%
- 4 bed 10%

- 9.8 An affordable housing statement has been submitted with the application. This states that of the 574 new homes to be built to replace the existing stock, 241 will be offered to be affordable housing (333 private sale). It is noted that the site currently provides 282 dwellings (253 social rent and 29 Leaseholders & Freeholders). Site wide, the proposed development would provide for 42% of the housing stock as an affordable housing contribution. However, it is noted that the Core Strategy (2012) requires the maximum reasonable affordable housing offer to be made of new development, with a borough wide target of 40%. Whilst on the face of it the proposal would provide a scheme with a 43% affordable housing offer, this would only effectively be replacing the existing housing stock.
- 9.9 There would be an increase in the amount of both affordable floor space and affordable bed spaces on the site, as a result of a reconfiguration in the housing mix. This would include both offers of Social Rent and Shared Ownership. To this end, the existing 15,672sqm would increase to 15,709sqm (social rent) and 1,611sqm (shared ownership), whereby totalling 17,320sqm for the site. In terms of the habitable rooms, the existing number of habitable rooms within the social rent unit tenure is 668. It is proposed to provide 627 social rented habitable rooms and 62 shared ownership habitable rooms totalling 689 affordable housing habitable rooms across the site. The existing number of social housing bedspaces is 822 and the proposed increases this to 758 social rented bedspaces and 74 shared ownership bedspaces totalling 832 affordable housing bedspaces.
- 9.10 Additionally, 10% of the social rented homes will be provided to full adapted (rather than adaptable) wheelchair standard to meet the needs of both existing residents with mobility needs as well as demand reflected in the council's Housing Register. None of the existing homes are capable of being adapted to full wheelchair standard.
- 9.11 As mentioned previously, the proposed development would be a Hybrid Planning Application, coming forward in three phases. Phase 1 would be brought forward under full planning application, with Phases 2 and 3 coming forward under an Outline Application. How this would impact the Affordable Housing delivery is based upon the Decant Strategy for the site, which requires Phase 1 (Full Planning Permission) to be 100% affordable housing and provide for 89 units. This therefore allows fewer movements of existing occupiers throughout the development process of the entire site. The remaining affordable units would therefore be spread out across Phase 2 and 3 of the development, which would come forward under the Outline Permission.
- 9.12 The applicant's statement also provides details of housing, tenure split and dwelling mix, which is noted as being a much revised make up to the units that currently exist. The proposed dwelling mix, as follows, aims to better reflect the need for the site:



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

Phase	Unit Type	Tenure			Totals
		Private	Shared Ownership	Social Rent	
Phase 1	1 bed flat	-	10	19	<b>23</b>
	2 bed flat	-	11	45	<b>56</b>
	3 bed flat	-	-	-	<b>-</b>
	3 bed house	-	-	4	<b>4</b>
	4 bed house	-	-	-	<b>-</b>
Phase 2	1 bed flat	58	-	24	<b>82</b>
	2 bed flat	85	-	36	<b>121</b>
	3 bed flat	11	-	8	<b>19</b>
	3 bed house	2	-	4	<b>6</b>
	4 bed house	2	-	14	<b>16</b>
Phase 3	1 bed flat	73	3	32	<b>108</b>
	2 bed flat	100	1	30	<b>131</b>
	3 bed flat	2	-	-	<b>2</b>
	3 bed house	-	-	-	<b>-</b>
	4 bed house	-	-	-	<b>-</b>
<b>Total</b>		<b>333</b>	<b>25</b>	<b>216</b>	<b>574</b>

- 9.13 Notwithstanding this, in terms of compliance with the policy requirement for affordable housing, the proposal would fail to provide a compliant scheme in terms of the uplift in residential units, i.e.; meeting the borough wide target of 40%. In support of the application, the applicant has submitted a financial viability assessment in an attempt to justify this position, and that the offer made is the maximum reasonable.

*The availability of public subsidy*

- 9.14 The applicant has submitted a Viability Assessment in support of the proposal's affordable housing offer. The unique nature of the proposed development, is that it is being brought forward by Harrow Council Housing Department. Given that the majority of the development site is set out as an affordable offer, the development must pay for the re-provision of this 'quantum' through dwellings for private sale (market units). Based on the information submitted by the applicant, the provision of the affordable units above, in conjunction with the 333 private sale units, still resulted in a significant deficit. In an attempt to reduce the deficit, the applicant has been successful in obtaining grant money. It is important to note that the grant money was received by the applicant on the basis that the bid for this was based on making the scheme viable, rather than a grant from the Mayor to increase the affordable housing offer.

Consideration of the Proposal's Affordable Housing Offer

*The need to promote housing choice*

- 9.15 The development would deliver the proposal's affordable housing contribution on-site, in accordance with the expectations of the London Plan. The Council's

Homes for Harrow and estate renewals projects, together with new developments elsewhere within the Borough, will add to the existing stock of more traditional homes in suburban areas. The proposed provision of contemporary flats would make a welcome addition to affordable housing stock by extending choice to those seeking an affordable home within a more central, urban environment. As mentioned previously, the dwellings on site are no longer fit for purpose, being erected in the 1960s as temporary accommodation for 30 years.

#### *The provision of family housing*

- 9.16 The provision of family housing, defined as homes of three or more bedrooms, has been increased across the site. The affordable housing statement identifies that the proportion of one bedroom units has been reduced from 395 to 20% and the number of three bedroom units also increased substantially from 3% to 11%. The scheme also now provides larger family units in the form of 4 bedroom six person units, which make up 11% of the development. Furthermore, 10% of the social rented units would be fully wheelchair adapted.

#### *The size and type of affordable housing required*

- 9.17 As noted above, the London Plan and Harrow's Local Plan calls for a tenure split of 60% social/affordable rented homes and 40% to be made available as intermediate homes. As noted, the regeneration of the site is unable to provide an uplift in affordable housing contribution, but would re-provide as detailed above. The split that has been proposed is based on evidence of the need for affordable accommodation both within the borough, and also specifically to the Grange Farm Estate.
- 9.18 Whilst it is acknowledged that the proposal would not meet the 40/60 split insofar as social rent and affordable rent, the objective of the proposal is to re-provide the quantum and type of housing that is currently existing on site. Such a mix would not comply with the target mix sought in Harrow's Planning Obligations SPD but, but would ensure the re-provision of the current accommodation on site, which is a key driver for the delivery of the proposal. It is considered that the proposed quantum, subject to the independent viability assessment, would be satisfactory in this location.

#### *Site circumstances and scheme requirements*

- 9.19 The proposal would deliver the key component of the regeneration of the site, as sought by the Core Strategy (2012). The proposal is also considered to meet, as it must, the Local Plan design requirements for high quality architecture and high quality public realm on the site. It is acknowledged that these Local Plan requirements will have a bearing upon overall development viability, albeit that the cost to the developer of providing the community centre would – as explained elsewhere in this report – be deducted from the cash amount that would otherwise be payable by the developer under the Harrow Community Infrastructure Levy. Furthermore, the proposed development, being an estate regeneration scheme, is required to re-provide the social housing on the site. Given the re-provision of the social housing on the site, essentially the quantum

of private sales element would be required to fund the social housing element and also the construction of the community centre.

#### *Development viability*

- 9.20 A Viability Assessment<sup>4</sup>, prepared by Redloft Limited and using the 'Argus Developer' industry-recognised software, has been submitted with the application. It concludes that the proposal, incorporating 237 affordable homes, would result in a significant financial deficit.
- 9.21 The applicant's assessment has been the subject of independent appraisal by consultant GVA Grimly on behalf of the Council ("the Council's independent appraisal"). GVA Grimly has scrutinised the applicant's Viability Assessment using both 'Argus Developer'. Particular attention has been paid to construction costs, but all of the inputs and assumptions contained within the applicant's appraisal have been tested.
- 9.22 The Council's independent appraisal confirms that the proposal would result in a financial deficit. Accordingly, it is recommended that the offer of 233 (43%) affordable homes within the development be accepted.
- 9.23 London Plan Policy 3.12 makes reference to the re-appraisal of scheme viability during phased development and the Mayor's SPG provides further amplification, referring to such provisions as contingent obligations. Harrow's SPD also sets some expectations as to the use of such review mechanisms. In this report, phase one refers to the development, the subject of this planning application and phase 2 & 3 to redevelop the remainder of the site (under Outline Permission). Given the potential for circumstances which could affect viability to change over the course of the development, it is considered necessary to require a review of scheme viability at an appropriate point in the development programme, and to seek additional contributions to affordable housing provision if appropriate in light of that review. Given that the applicant is Harrow Council, the usual mechanism to secure obligations, though a S.106 legal agreement is not able to be entered into. However, the applicant has agreed that a review mechanism would be reasonable. Accordingly, a shadow S.106 agreement would be drafted, and the planning obligations required of the applicant are made clear at the beginning of this report.

#### *The need to meet the 40% Borough-wide target*

- 9.24 The 40% Core Strategy target is a Borough-wide target for the plan period and is not a site specific target. Nevertheless, the target is a useful indicator of the performance of development in terms of delivering new affordable homes within the Borough. The following information is taken from Harrow's Authority's Monitoring Report (AMR)<sup>5</sup>:

#### **Table 3: Annual Proportion of New Homes Completions that are Affordable**

<sup>4</sup> The assessment includes commercially sensitive information. Therefore, in accordance with normal practice, the assessment is not publicly available.

<sup>5</sup> See Table 16 *Affordable Housing Completions*, page 53 of the Harrow AMR for 2013/14.

Year	Proportion of new homes completions that are affordable (net)
2009/10	41.5%
2010/11	29.8%
2011/12	46.8%
2012/13	42.8%
2013/14	5.3%
2015/16	6.2%
Total to date	33.2% AMR

9.25 Thus, whilst the threshold of 40% has been met for three out of the six years monitored since the beginning of the plan period, given the poor performance in two years (particularly 2013/14 and 2014/16 (at the time of writing this report), which may in part be attributable to the impact of the office to residential 'prior approval' scheme) and continuing affordable housing need in the Borough, the importance of maximising the contribution of individual schemes to the supply of affordable homes remains.

9.26 The proposed redevelopment of the scheme would not be able (demonstrated through viability) provide for an uplift in affordable housing borough wide target of 40%. However, paragraph 2.66 of the Mayors Affordable Housing and Viability SPG (2017) states;

*'...schemes which include the loss of affordable housing will be required to ensure that existing affordable housing is replaced by better quality accommodation, providing at least the equivalent floor space of affordable housing. The Mayor expects existing affordable housing to be replaced on a like-for-like basis, meaning that, for example, homes at social rent levels should be replaced with homes at the same or similar rent levels, or that specialist types of affordable housing should be replaced with the same type of housing. The Fast Track Route does not apply in these circumstances, and all estate regeneration schemes should follow the Viability Tested Route to deliver the re-provision of the existing affordable floorspace on a like-for-like basis and maximise additional affordable housing...'*

9.27 Based on the above exert from the Mayors SPG, and the figures quoted above, it is clear that the proposed redevelopment would provide a lower quantum of affordable housing units, but would provide a higher level of affordable floor space and habitable rooms. Furthermore, the proposed redevelopment would provide a much higher quality of accommodation for future occupiers, which is more tailored to their needs (unit mix), which is required for the Grange Farm Site and Borough as a whole. Lastly, the Viability Assessment submitted with the application, and independently reviewed, concludes that the scheme is unable to provide an uplift over and above that stated above. It is therefore considered that the proposed development would accord with the Mayors intentions for Affordable Housing provision.

9.28 The Mayor of London has produced best practice guidance in relation to Estate Regeneration, and specifically, what he expects to be re-provided on the site in relation to affordable housing. It is noted that that this document is still in draft

form and as such can only be afforded limited weight, however, is considered as follows. Firstly, it states (point 9) that where demolition is and rebuilding is chosen as part of estate regeneration, this should only happen where it does not result in a loss of social housing, or where all other options have been exhausted. As mentioned previously, the current quality of the housing stock is extremely poor, being built specifically in the 1960s as temporary accommodation, with an anticipated lifespan of 30 years. The current housing stock has significantly existed beyond this time frame, and has become inefficient and poor quality. As mentioned above, the proposed replacement affordable housing contribution would result in fewer units and habitable rooms, however, would result in a much higher level of floorspace across the site. Furthermore, it would provide a much higher quality of living accommodation than that which currently exists.

- 9.29 Given the proposed affordable housing contribution would provide better quality homes (many exceed the minimum floor standards, as requested by returning residents of the estate), and would provide more floor space than existing, this would comply with the requirements as set out within Point 10 of this document. It is therefore considered that the proposed affordable housing for the site would meet the needs of the community it is intended to meet, be of a much higher quality than that which currently exists, and given it exceeds the amount of floor space than currently on site, would comply with the draft Good Practice Guide to Estate Regeneration.
- 9.30 Following on from this document, Policy H10 (Redevelopment of existing housing and estate regeneration) of the Draft London Plan (2017), also includes commentary in relation to the re-provision of *floorspace* within the estate. Again, with the increase in both the affordable floorspace within the development, and also the much higher quality, it is considered that the proposed would accord with this draft policy. It is also noted that this draft policy also refers to providing an uplift in affordable housing, however, as discussed elsewhere within the report, the supporting Financial Viability Assessment (which has been independently tested), demonstrates that any uplift is not financially viable.
- 9.31 Notwithstanding the above position, the applicant (being the Council's Housing Department) has agreed to the use of a review mechanism to be applied to any decision to grant permission. The use of a review mechanism is supported by the Mayor where schemes provide a lower than policy threshold quantum of affordable housing. Furthermore, phased developments, such as this scheme, are ideal for applying such a mechanism, as there is lower certainty of when the phases may come forward, and what the market circumstances at that time would be.
- 9.32 At the writing of this report, a finalised independent assessment of the applicants financial viability assessment had not been issued, with draft conclusions provided above. However, the final appraisal conclusions would be presented to the Planning Committee by way of an addendum.

## 10.0 Housing Supply, Density and Overall Housing Mix

- 10.1 Paragraph 48 of the NPPF reminds local planning authorities that housing

applications should be considered in the context of the presumption in favour of sustainable development.

- 10.2 London Plan (2016) and Local Plan policies on housing development must be viewed in the context of the forecast growth across London and Harrow's spatial strategy for managing growth locally over the plan period to 2026. In this regard, it should be noted that, following the adopted further alterations to the London Plan, London's annual housing monitoring target has increased from 32,210 to 42,389 homes p.a. and this includes Harrow's target which has increased from 350 p.a. to 593 p.a. For Harrow, this translates into a new ten year target to deliver 5,927 homes. Whilst it is acknowledged that the Draft London Plan (2017) has increased Harrow's annual target to approximately 1400 dwellings, this is still very early within the consultation phase, and as such very limited weight it afforded to it.
- 10.3 London Plan Policy 3.4 *Optimising Housing Potential* seeks to optimise housing output from development by applying the sustainable residential quality density matrix at Table 3.2 of the Plan.
- 10.4 The application site displays the characteristic of a 'suburban site, with elements of an 'urban' site. The density of the proposed development would be 140 dwellings per hectare and 380 habitable rooms per hectare. Paragraph 3.28 of the reasoned justification to Policy 3.4 is clear that the density matrix is only the start of planning for housing development and that it should not be applied mechanically. This indicates that proposed development would be within the relevant density thresholds afforded by this table.
- 10.5 Paragraph 50 of the NPPF states that local planning authorities should plan for a mix of housing, based on demographic and market trends, and the needs of different groups, and that they should identify the size, type, tenure and range of housing that is required in particular locations. This approach is reflected in the planning decisions provisions of London Plan Policy 3.8 *Housing Choice*. Consideration of the proposed affordable housing mix, relative to Harrow's target mix for affordable housing and the priority to be afforded to the delivery of affordable family housing, is set out in the preceding section of this report.
- 10.6 The West London Strategic Housing Market Assessment (2010) reports the findings of detailed modelling of housing needs taking into account demographic and market trends and the needs of different groups. In terms of Harrow's market housing, the Assessment reports a shortfall of 2 and 4 bedroom homes in the owner-occupier sector and a shortfall of 1 and 3 bedroom homes in the private rented sector. Notwithstanding these findings, the Council has not prescribed a housing mix for market housing in the Local Plan, preferring instead to advocate flexibility to respond to circumstances including the location and nature of proposed developments.
- 10.7 The applicant's affordable housing statement includes details of the proposed market dwelling mix, and the quantum and proposed mix which are based on local evidence base. Affordable Housing is discussed elsewhere within this report.

- 10.8 The full Planning Permission which would be brought forward under Phase 1 of the development, would provide 89 residential units. It is noted that all of these are of an affordable tenure, which would assist with both meeting the onsite targets and also to assist with the Decant Strategy (discussed elsewhere). The mix of housing in this element is based upon both providing affordable habitable floor space, and also in reaction to specific housing studies of the Grange Farm Estate: i.e. what housing is actually needed for the existing occupiers to be re-housed on the site. Accordingly, it is considered that the housing supply and mix with regard to this element is satisfactory.

#### Outline Permission

- 10.9 As detailed above, the proposed development would come forward in three phases. Phase 1, which is coming forward under a full planning application, would be 100% affordable provision. Phases 2 and 3 would come forward under an Outline Permission. Table 2 above demonstrates under Phases 2 and 3 how much housing would come forward, and what the split would be across the tenures. Across Phases 1 & 2, the development site would provide for 148 social rent and 4 shared ownership. All 333 market sale units would be provided for within Phases 2 & 3.
- 10.10 Thus it is considered that the proposed mix of home types/sizes would respond to the location of the site and the character of its surroundings whilst optimising the housing output of this large site earmarked for regeneration. The proposal would add to the supply of contemporary new-build homes in the area, all of which would achieve the standards set out in Part M4 of the Building Regulations, and 10% of which would also achieve the enhanced requirements needed to be classified as Wheelchair-standard homes. Taken together with the affordable housing component, it is concluded that the proposal would make a positive contribution to the creation of inclusive and mixed communities.
- 10.11 The submitted documentation under the Outline element has provided indicative plans to demonstrate that the proposed quantum of housing as detailed under Table 2 can be physically provided for on site. The proposed Outline element would be subject to a Design Code, which provides details on internal layouts of the development.
- 10.12 It is considered that the Outline Permission, which provides the private housing offer, would be capable of providing a satisfactory level of accommodation for the future occupiers of the site. The outline permission would be required to be followed by a reserved matters application, which would provide further detail of the layouts etc of the accommodation provided under Phases 1 and 2. Any forthcoming reserved matters application would need to demonstrate compliance with the Design Code submitted in support of the current hybrid application.
- 10.13 It is considered that the proposed quantum of housing across both the full planning permission and outline permission would provide a satisfactory quantum and reasonable mix of housing for the location. The proposal would comply with the relevant policy listed above.

## 11.0 Residential Quality of Proposed Development

- 11.1 London Plan Policy 3.5 Quality of Design and Housing Developments sets out several criteria for achieving good quality residential development. The policy aims to ensure that developments enhance the quality of local places and create homes that reflect the minimum space standards and are fit for purposes in other respects. The policy also provides a commitment that the Mayor will issue guidance on implementation of the policy, and this commitment is fulfilled by the publication of the Mayor's Housing SPG (2016). The SPG sets out detailed guidance on a range of matters relating to residential quality, incorporating the Secured by Design principles, and these form the basis for the assessment below.
- 11.2 Core Strategy Policy CS1 K requires a high standard of design and layout across all tenures within a development and consistent with the London Plan and its associated SPG. Local Plan Policy DM 1 Achieving a High Standard of Development requires all development to achieve a high standard of privacy and amenity, and sets out a range of criteria for the consideration of the same. The Council's Residential Design Guide supplementary planning document is also relevant.
- 11.3 In terms of the overall comprehensive redevelopment of the site, Phase 1 under the full planning permission provides detailed information, whilst Phases 2 and 3 coming forward under an Outline Application are subject to a Design Code. Whilst each of the two elements could be considered in isolation, it is considered given the comprehensive nature of the development, that overall quality of the scheme can be considered as one, given how the development would be read.

### *Defining good places*

- 11.4 The proposed development has amended the existing highway network throughout the site, which currently result in the estate being very isolated with little through traffic or permeability. The proposed highway network throughout the site provides a much more permeable development with a much more legible layout whereby allowing a better legibility of the site. As part of the revised highway layout, there would be a main thoroughfare which would connect Shaftesbury Avenue with Dudley Road. Outside of the main thoroughfare, two secondary roads within the development would provide access to the remaining plots. It is proposed that the two secondary roads would be shared surfaces, whereby enabling more inclusive access with vehicles and pedestrians, leading to a more inclusive public realm. The proposed layout also results in better and more legible open space. Following on from this, the positioning of the buildings within the development ensure a satisfactory relationship between them and the highway and open space areas.
- 11.5 The increased permeability of the site as a result of layout of the highway and relationship with the public realm areas and replacement buildings with private amenity spaces, provide a clear and rational approach to the development of the site. The public areas within the site, including the public highway and communal



gardens benefit from high levels of natural surveillance.

#### *Outdoor spaces including gardens*

- 11.6 Local Plan DM19 Provision of New Open Space supports major residential developments that make provision for new open space, or enhancements to existing open space, which meets the needs of the occupiers of the development. The adequacy of the proposed open space and other public realm is appraised elsewhere in this report.
- 11.7 The proposed development, whilst in a Hybrid Application form, requests that the landscaping for the entire scheme is to be considered. The submitted information however, has detailed that the landscaping that is not communal / publically accessible, would be reserved for a later detailed application. However, it is noted that procedurally the Local Planning Authority are unable to separate between private and public landscaping. It is noted that the Outline Permission supporting detail, specifically the Design Code, has provided detailed plans relating to the private gardens located within the plots within Phase 2. In any case, given that the Landscaping is able to be considered under this scheme, the LPA are able to condition this element, and therefore conditions are recommended accordingly.
- 11.8 As mentioned previously, the existing public space is of a relatively poor quality. It generally consists of grass and some (albeit some of a high quality) trees sporadically located across the site. The proposal would result in a much more well thought out and designed public open space, which would be of a benefit both to future occupiers and also visitors to the site. Firstly, it is noted that the access from Northolt Road would be much improved, by removing the existing single storey MOD facility, and introducing appropriate hard / soft landscaping and lighting. The Village Green, which would be located to the east and west of the proposed community centre would be very hard working, providing several options for its use. Elsewhere within the site, pockets of well-designed communal space would be provided for the use of occupiers and visitors to the site.
- 11.9 Located within the centre of the blocks that are not open to the public, and the blocks that back onto the boundaries of the site, specifically designed open space is provided. These provide a mixture of hard and soft landscaping which would be a place of leisure and / or relaxation for the future occupiers of the site.

#### *Outdoor play space*

- 11.10 DM 27 Amenity Space and DM 28 Children and Young People's Play Facilities reiterate the need for children's play space. The Council's Planning Obligations SPD, informed by Harrow's PPG 17 Study, sets a quantitative standard of 4 square metres play space per child. GLA guidance seeks a higher quantum of play space, whereby requiring 10sqm to be met. Whilst this scheme is GLA referable, the LPA has determined that in its decision making process, as a result of the PPG 17 study, the scheme must demonstrate compliance with the LPA requirement of 4sqm, whilst encouraging the development to meet the higher GLA threshold of 10sqm.

- 11.11 As mentioned previously, the site is designated as open space. However, the existing open space, which provides some play space on site, is noted as being of a very poor quality. Firstly, the open space that is located around the existing dwellings does not provide a satisfactory level of usability and functionality for the existing occupiers. The designated play space on the site is located centrally, and consists of dated equipment that is not designed to cater for all age groups within the estate. The proposed regeneration scheme would address this imbalance by providing play space quantum and quality that is better suited to the needs of the occupiers, and also to better accord with the play standards at a local level and also at a London wide level.
- 11.12 Applying the child yields at Appendix 1 of the SPD, it is calculated that the development would yield a total of 153 0 – 4 years old, and 131 other age group. Harrow require 4sqm per child, therefore based on the above a total of 1,136sqm is required to be provided. It is noted that GLA policy determines that child yield for the site would be 120 0 – 5 year olds and 114 other ages groups. This would therefore require a total play space of 2,340sqm. The proposed development provides a total of 2,675sqm of dedicated play space across the site, which is a vast improvement on the existing quantum of 385sqm, and exceeds both the quantum's required by the GLA and Harrow Council.
- 11.13 The revised layout of the development has now included a Multi-Use Games Area (MUGA), which would be located at the western end of the open space identified as the Village Green. Adjacent to this would be an area set outside to have children's play space.
- 11.14 The submitted site-wide play space strategy is considered to be acceptable. Appropriate conditions would ensure that detailed design of the play spaces including suitable landscaping, climbable objects, fixed equipment, facilities for younger and older children and facilities suitable disabled children and carers.
- 11.15 As mentioned previously, the existing estate has a designated play space located to the rear of blocks 1 – 27 Osmond Place, and as such sits on the highest part of the site, and within Phase 2 of the re-development. It is encouraged that there be no net loss of designated play space for the development, even for the duration of the phase 1 construction phase. This matter was also raised by the Mayor of London in his Phase 1 response. Accordingly, it is considered appropriate that a condition be attached to require details of where the existing play space would be located within the Phase 2 development whilst construction of Phase 1 is being carried out.
- 11.16 In support of the application, the applicant has submitted a daylight and sunlight impact assessment.
- 11.17 Paragraph 4.48 of the Play SPG advises that play spaces should benefit from overlooking/passive surveillance and that if leftover, overshadowed or windy spaces are utilised they should be made worthy through innovative design. The shadowing, however, is a function of the layout of the proposed buildings. The submitted Daylight & Sunlight Report demonstrates how the proposed building blocks would impact on the accessibility to daylight/sunlight of the open spaces of

the site. With regard to the full planning permission element (Blocks C, D, and E), the internal amenity space would spend substantial periods of the day in shadow. Furthermore, under the Outline Element, Plots 3 (Blocks F, I, J), 4 (blocks G, H) and 5 (Blocks K, L, M, N) being enclosed, these provide limited access to daylight / sunlight throughout the day. This is by reason of the enclosed nature of the blocks. Lastly, the communal amenity space of Block R would also spend substantial periods of the day in shadow, by reason of its orientation to the north of the Block. It is acknowledged that the results for the (private) communal space would indicate that relatively poor levels of daylight / sunlight are received by these areas. Whilst this is not ideal, it is noted that these areas are communal space for the residents of the development (not for the general public), and whilst providing an important amenity provision, is secondary insofar as each of the flats would have private amenity space through the use of balconies and rear gardens. Again, whilst some of the private amenity space to these units may also result in low levels of direct access to daylight / sunlight, on the balance of the overall development, an acceptable level of residential amenity spaces would be provided.

- 11.18 Aside from the private communal amenity space provided on site, a significant amount of publically accessible open space would also be provided. The Daylight / Sunlight Assessment provided, demonstrates that the publically accessibly open space would generally receive a high quantum of access to Daylight / Sunlight. Again, these areas are available to future occupiers of the site, and as such provide further choice to occupiers in terms of amenity space. The proposed publically open space would also provide for the dedicated play space equipment, specifically within the Village Green. The submitted information details that the publically open space on the site would receive a satisfactorily amount of access to Daylight / Sunlight.
- 11.19 The outdoor play spaces, by reason of their siting within the development, would enjoy high levels of natural surveillance from the residential elements of the scheme. The residential elements have private amenity spaces either provided by external or internal balconies, which allow a high level of overlooking into all of the communal areas. The large village green would also have the community centre located on the eastern end of this element. The proposed plans indicate that the western elevation of the community centre would have an active frontage onto the village green, and as such this would also provide a further element of overlooking in relation to this open space. In all of these circumstances it is concluded that the play space provision would be reasonably safe and secure.
- 11.20 The proposed community centre has been designed to provide for a range of uses, one of which would be to provide for play space. This space would be inclusive for all and provide a high quality space for future users.
- 11.21 Where provided at ground level, all of the play space would be accessible to the mobility impaired. The play space located within the community centre would also provide level access into the building, and also access to the upper floors by way of lifts for the mobility impaired. In accordance with the inclusion principles set out in the Mayor's Play SPG, it is considered that the equipment provided should make provision for children with disabilities and special sensory needs. This can

be secured as part of the agreement of details, by condition.

### *Entrances*

- 11.22 The Mayor's Housing SPG calls for entrances to be visible from the public realm and clearly defined. The entrances to the residential lobbies of buildings would be situated on the elevation facing the public highway/realm. Access to flats which require a communal access would be double height. Furthermore, each of the communal entrances has been demonstrated as having attractive detailing. The plinth that runs along the ground floor of the building would wraparound the double height entrances, which would ensure that the entrance to this element from within the streetscene would be legible. Furthermore, the double height entrance would have a single splayed wall which would be finished with a dogtooth brick pattern. Outside the front entrance, a defensible planting strip would be provided, with a herringbone brick extended from internal out onto the street. Entrances would also have a clear line of site to the double height entrance on the rear of the blocks, which would lead onto the communal amenity space to the rear of any of the relevant blocks.
- 11.23 Each of the proposed blocks are noted as having both communal access to them along with private dwelling accesses. Along with careful detailing of the communal accesses as discussed above, private accesses must also be detailed successfully. Private entrances would be characterised by having the main door recessed behind the main front elevation. The recess allows for the sensitive location of housing electrical meter. Forward of this would be a small private garden, which would provide for a low wall with a gate, with decorative tiles proving path up to the front door. An integrated storage facility for bins would also be located within the front garden area. The internal floor plan allows for a kitchen to be located on the front elevation, which allows a level of surveillance into the public realm. Private dwelling entrances within each of the streetscene are critical in ensuring a successful streetscene is provided within the development. The proposed quantum and detailing ensures that this would be provided and would provide a high quality streetscene and public private interface.
- 11.24 The proposed Community facility is unique within the site as it is located within a highly prominent location, with all four elevations fronting onto either a communal open space or a public highway. The proposed building must therefore detail the entrances on each elevation to a high standard, whilst ensuring that the function of it is maintained. Most importantly, the eastern and western elevations are the most critical, as these both form primary entrances to the building, and also lead off from the communal spaces identified as Grange Square and the Village Green. Whilst most of the proposed community centre is constructed of timber, the ground floor, and in particular around the entrances, a more robust concrete plinth would be utilised. The Use of materials, as well as the articulation at the ground floor ensures that eastern and western elevations, which open out onto the open space areas provide successful entrances, whereby ensuring a legible 'frontage' to both Grange Square and the Village Green.

### *Shared circulation*

11.25 The SPG sets out the following guidelines (as relevant to the proposed development) for shared circulation space:

- all flats should be provided with an entry-phone system to operate the release of the main (communal) entrance door and that, unless a 24 hour concierge is provided, audio-visual verification to the access control system should be provided;
- internal corridors should receive natural light and ventilation;
- all flats should be served by at least two lifts; and
- the number of flats accessed from a single core should not exceed 8 per floor.

11.26 The detailed planning permission element is proposed to be fully affordable housing in tenure, and as such would be managed by a Management Company. Accordingly, it is considered that management may involve concierge or an entry phone / audio video entrance system. In any case, this can be secured by way of the site wide management plan.

11.27 Each building would be served by its own lift and stair core. A number of the buildings would have multiple cores as a result of the scale of the buildings, with not all flats being served by two lifts. However, it is noted that where there is only one lift providing access to the flats, there is in most cases only three flats being accessed per lift. Where there are more flats providing, at least two flats are provided.

11.28 The number of flats accessed from each of the cores serving each building would comply with London Plan aspirations.

11.29 The minimum space standards are set out at Table 3.3 of the London Plan 2016. The full planning permission element of the application has submitted detailed floor plans of the proposed residential accommodation. The submitted information that in all instances the proposed accommodation meets the minimum gross internal floor area, and in many instances exceeds the standards set for each respective unit occupancy level. Further to the Gross Internal Floor Areas being achieved across for the full planning permission element, the floor plans also indicate that the layouts of the proposed flats would be functional, and would ensure a quality layout for future occupiers.

11.30 The elements of the development that are subject to the Outline Permission, will be required to meet London Plan Gross Internal Floor Standards as part of any forthcoming Reserved Matters application. Furthermore, the Design Code requires compliance with London Plan standards.

*Storage and utility space, study and work*

11.31 As a minimum for 1 & 2 person occupation, the Mayors Housing Standards (2016) requires storage space to a minimum of 1.5 square metres and 2. The applicant, in developing the scheme, held multiple workshops with existing occupiers which assisted in providing the optimum internal layout. Feedback

provided by existing residents (likely to return to the development) identified that storage space is an important feature in any replacement accommodation. Accordingly, the submitted information demonstrates that there is a satisfactory level of internal storage for the future occupiers of the full planning permission element.

- 11.32 The SPG also seeks adequate space and services to work from home. An indicative furniture layout is set out on the application drawings and this demonstrates that all of the flats, would have space for a table. As such, each flat would have space flexible for dining and home study/work activities. It is envisaged that occupiers will make their own arrangements with regard to securing internet access.

*Private open space*

- 11.33 The SPG seeks a minimum of 5 square metres private outdoor space for 1 & 2 person dwellings, increasing by 1 square metre for each additional occupant. A minimum depth and width of 1.5 metres is sought for all balconies and other private open spaces.
- 11.34 All of the proposed units would be provided with private amenity space. Each of the flats would have either been provided a private balcony and/or a private garden. In some instances the opportunity has arisen to provide multiple private external amenity space for units. In almost all instances the proposed quantum for private amenity spaces has been exceeded.
- 11.35 Notwithstanding the above justification, the proposed development would have a large amount of communal open space across the site discussed below. This would further mitigate any impacts that may have been felt by any marginal shortfall of private amenity space.
- 11.36 Most of the proposed blocks within the development would not front onto a main highway outside of the site. Whilst it is noted that some would be fronting onto the main internal highway, this is considered to not result in an environment of high noise generation. The secondary roads would be even less so. The proposed private amenity spaces provided by way of external (cantilevered) balconies are therefore considered to be appropriate and would provide satisfactory private amenity space that would not result in future occupiers amenity being harmed by noise and disturbance. Notwithstanding this, it is noted that there are some recessed balconies which are also considered acceptable.
- 11.37 Block D is noted as fronting onto Shaftesbury Avenue. Whilst this block would have habitable rooms fronting onto this highway, the private amenity spaces would be located on the eastern flank elevation facing the internal access road. This would provide a less noisy environment for these units, rather than fronting onto Shaftesbury Avenue. Accordingly, the private amenity space for these units would be acceptable in relation to this matter. The ground floor units would have private amenity space to the rear.
- 11.38 Proposed Block E would face onto Shaftesbury Road, and is characterised by

providing ground floor amenity space to the rear of the block. This would be provided for each of the eight dwellings within this terrace. However, the four 3bed, 5 person dwellings are noted as having an inset balcony / terrace within the rear facing roof form, which would overlook the central square. This extra private amenity space would provide further useable space for the larger quantum units within the development, and would

- 11.39 Proposed Block E, C & D both benefit from ground floor gardens under the full planning permission. These are an acceptable size, and would provide for cycle storage. The ground floor private amenity space would allow for a useable space, however, to ensure that they are defensible a condition is recommended for further details on this matter.

### *Privacy*

- 11.40 The SPG calls for habitable rooms within dwellings to be provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces. Paragraph 2.3.30 of the SPG refers to the acoustic as well as the visual privacy of homes within a development – see appraisal under heading internal noise below.
- 11.41 The starting point for the consideration of the subject proposal is context of the urban grain within which the application site sits. Currently, the application site generally has a suburban feel with some elements of urban to it. Whilst the application site as existing, represents a relatively low intensity form of residential development. It is clear that the urban grain varies from low density on the north/western side of the site up to a more urban context on the south/eastern side, moving from metro-land up to larger office buildings. The proposed development is a comprehensive regeneration/redevelopment of the site, which aims to use the site much more efficiently than the existing housing quantum. Given the large site area, the proposed development would result in a wholesale change in the character of the site, whilst still maintaining a conscious stitching into the existing fabric.
- 11.42 In terms of building-to-building relationships, the separation distances across the site are considered to be acceptable. As existing, the estate is much less dense in terms of housing numbers, and as such the relationships between existing dwelling is much less compact overall. However, it is noted that in some instances there are some relationships resulting in habitable rooms in close proximity.
- 11.43 The proposed redevelopment of the site would significantly change the character of the site as a whole, and would increase the overall density of the housing quantum. By reason of the proposed development significantly changing the character of the site, the relationship between buildings within the site would also be viewed differently to that which exists currently. The proposed change in character of the site in terms of heights, layout and quantum would legibly result in a more compact development within the site, which may not be considered appropriate for a lower density and height of the existing stock. Furthermore, much of the distance between the proposed buildings, specifically those

elevations with the majority of habitable window, are dictated by the proposed highway layout. This provides a visual break between a number of the buildings and habitable rooms. Where this is not the case, the primary elevations between buildings would be separated by Open Space.

- 11.44 For the blocks that are located with the longest elevations face to face, the distance between blocks would be no less than 15m across the roads. Where this relationship is most keenly felt would be the relationship between Plot B and Plot G, Plot B and Plot F, Plot C and Plot F. Each of these relationships occur across the secondary road within the development, and as mentioned previously, would at its minimum distance, be 15.6m between Plot B & G. Both of these blocks would result in habitable rooms fronting onto the public highway, and as such towards each other. However, it is noted that whilst habitable rooms would be facing each other over the road, this would not be an unusual relationship in a residential area. It is noted that whilst there would be a habitable room relationship between these two properties, each of them have located the respective private amenity spaces appropriately. Plot B is noted as having some small informal play space at the front door of the Plot, however, would have its primary amenity space to the rear. Indicative plans Plot G (under Outline permission) is noted as having its projecting balconies either projecting from either end of the plot, or facing off the southern elevation over the open space. A roof terrace is proposed at the western end of Plot G, and whilst this would enable some degree of overlooking, would be at such an oblique angle so as not to be unacceptable.
- 11.45 Similarly, the southern end of Plot B would be opposite the northern end of Plot F, with similar impacts as state as above. Again, the amenity space would be located on the opposite side of the respective buildings. It is therefore considered that given the siting of the amenity space, and within the context of the development, the privacy of future occupiers of these units would be satisfactorily protected.
- 11.46 Proposed Plots C & F are located on the junction of the main entrance off Shaftesbury Avenue and the first internal (secondary road). Again, these two buildings would have a separation distance ranging from 18.0m down to 15.1m, and would have a relationship where habitable rooms would be facing each other across this distance. The southern elevation of Plot C would have private amenity space provided by way of balconies. It is noted that a number of the units on this elevation would also be dual aspect. Again with Plot F, indicative plans show the amenity space would (balconies) would be located on the southern elevation, and such there would not be a direct conflict for future occupiers through a loss of privacy between these. Lastly, whilst it is acknowledged that there would be some loss of privacy as a result of the proximity between the two plots, in the context of the development scheme, which would not be unreasonable and as such would not sustain a reason for refusal on this basis.
- 11.47 The remaining relationships between buildings where the longer elevations are face to face are noted as all being in excess of 23.0m. It is considered that this distance in the context of the proposed development would ensure that the privacy of future occupiers would be protected to an acceptable level.



- 11.48 Proposed Block C, which runs parallel with Shaftesbury Avenue, is noted as having a deck access above the maisonette units on the ground and first floor. The design rationale behind this was to ensure that the north facing units would not remain as single aspect. Within this block, there would be a centrally located access to the flats above, which lead up to the deck access. The deck access has been designed in such a manner that ensures only two flats are located from each deck, which assists in reducing the amount of disturbance and potential for loss of privacy. Upon accessing the deck which would provide the access to four flats, a key fob would provide access to one of the two access doors, which would then provide access to only two for the flats. It is noted that there would be some potential for a loss of privacy of the first flat within the deck access, as occupiers of the second flat would have to pass this flat. However, it is noted that the floor plans indicate the window facing the deck would be for a kitchen, which would be a similar relationship for ground floor units (albeit with less people). Furthermore, the design has allowed for a small planter box to be located below the kitchen window, which would enable this space to be utilised for some soft landscaping, whereby affording some screening for privacy. The bedrooms and living/dining rooms to these units would be located adjacent to the southern elevation, where there would be a balcony for amenity space and less privacy issues.

#### *Outline Element*

- 11.49 The Outline Element does not provide floor plans, with detailed floor layouts provided through a reserved matters application. However, the location of the buildings in relation to each other have been submitted. The spacing of the buildings in relation to each other would enable a floor plan to be proposed that would ensure that satisfactory accommodation would be able to be provided for future occupiers of this phase. However, the final layouts as part of a reserved matters application would still be required to demonstrate privacy would be acceptable for these future blocks.

#### *Dual aspect*

- 11.50 The SPG seeks to avoid single aspect dwellings where: the dwelling is north facing (defined as being within 45 degrees of north); the dwelling would be exposed to harmful levels of external noise; or the dwelling would contain three or more bedrooms. The definition of a dual aspect dwelling is one with openable windows on two external walls, which may be opposite (i.e. front & back) or around a corner (i.e. front and side) and the SPG calls for developments to maximise the provision of dual aspect dwellings.
- 11.51 The full planning application element of the proposed development (Blocks C, D, and E) provide a 'U' shape development within the site. By reason of the design of this element and its orientation within the site, there are a number of north facing units. It is noted that on the ground floor of each of the blocks, each of the units would be dual aspect. Proposed Block E is noted as being set up as single family home, with accommodation within each of the units being either over two or three floors. Each of these eight units would have dual aspect and therefore have a suitable accommodation in this respect. The ground and first floor of Block

C is set out as maisonettes, and as such each of these units would be acceptable.

- 11.52 By reason of the alignment of Block C, it would have the only true north facing flats within the full planning permission element. Acknowledging this, the applicant has provided the north facing elevation (facing into the communal courtyard) with a recessed deck access to the units above the first floor. The use of the deck access allows access to the four flats per floor along the outside of the building (within its envelope still), which enables the flats to run north – south through the building, which ensures that each of the flats would be dual aspect. The specific layout of these in terms of privacy etc will be discussed later in the report. However, in this instance provides a satisfactory design solution to ensure that the accommodation that has the most potential to be impacted upon in terms of satisfactory aspect, has been mitigated.
- 11.53 The remainder of Block C, which would join with Block D and run parallel with Osmond Close (accessed from Shaftesbury Avenue). It is noted that this block has two cores (one each for Block C and D), which provide this accommodation with an internal access above the ground floor. By reason of this type of arrangement, the floor plan has been split through the middle, resulting in single aspect units. It is noted that from the first floor up the fifth floor generally replicate each other in terms of their vertical stacking. At the northern end of the block (Block D facing towards Shaftesbury Avenue) is a 2bed, 4person flat, which is noted as being dual aspect, with an easterly aspect. At the southern end, a single aspect 1bed, 2person flat is located across these floors. Whilst single aspect is not encouraged, a shallow unit depth low occupancy, in conjunction with the southerly aspect, is considered appropriate. It is considered that these units are satisfactory.
- 11.54 Along the elevations facing out of Osmond Close and into the communal amenity area, there are seven units across floors one to five that are single aspect. Again, these units have been designed in a manner that ensures that the habitable spaces are located nearest the elevations, to ensure they receive the most favourable amount of aspect. Furthermore, these units generally do not have overly deep building depths. Lastly, each of these units are either west or east facing, and as such would not fall foul of providing single aspect north facing units.
- 11.55 Located within the 6<sup>th</sup> floor plan are four units. It is noted that one is dual aspect (north – south) with the other three being single aspect, but being are east – west facing. Accordingly, it is considered that these units provide a satisfactory level of accommodation in this respect.
- 11.56 To conclude, every effort has been made in the design and layout of the proposal to maximise the number of dual aspect flats. Any of the units that would be north facing have been designed in such a manner that they would be dual aspect. The full planning permission element has resulted in some single aspect units, however, these have been located to ensure either a easterly or westerly aspect.

### *Outline Element*

- 11.57 The submitted Design Code in support of the application identifies that much of the development as a whole would result in blocks that have a north to south aspect. It therefore goes on to state that further blocks coming forward under a reserved matters application (where residential layout would be detailed) would need to include the Deck Access to ensure single aspect north facing units are avoided.

*Internal noise*

- 11.58 The SPG seeks to limit the transmission of noise between flats, and from lifts/communal spaces to noise sensitive rooms, through careful attention to the layout of dwellings and the location of lifts. Local Plan Policy DM1 includes among its privacy and amenity considerations the adequacy of the internal layout in relation to the needs of future occupiers, and Harrow's Residential Design Guide SPD amplifies the point by advising that the vertical and horizontal arrangement of flats within a development should avoid conflicting room-use (i.e. bedroom vs. living/other room) relationships between flats.
- 11.59 In this regard, the proposal performs as well as may be expected of a high density development. Generally, and with some inevitable exceptions, the proposal secures good horizontal arrangement by 'handing' the floorplans of individual flats across each floor, whilst the use of repeated layouts over several floors at a time ensures that conflicting vertical arrangements are minimised. The objective of the SPD in this regard is to supplement the sound insulation requirements of the Building Regulations which would, of course, still need to be achieved. It is therefore concluded that the 'in combination' benefit of the proposed layouts and the Building Regulations together would be one of optimum acoustic privacy/noise conflict limitation between flats across most of the development.
- 11.60 Similarly the design and layout of the proposal, which places stair cores, lifts and communal corridors centrally within each building and locates bedrooms towards the exterior, ensures separation in all but a handful of instances and so, again in conjunction with the Building Regulations, would provide optimum noise conflict limitation within the development.

*Floor to ceiling heights*

- 11.61 The SPG seeks a minimum floor to ceiling height between finished floor level and finished ceiling height in habitable rooms of 2.5 metres. Cross sections shown on the application drawings confirm that this would be achieved.

*Daylight and sunlight*

- 11.62 The SPG established no baseline standard for daylight or sunlight. Local Plan Policy DM1 includes among its amenity considerations the adequacy of light and outlook within buildings (habitable rooms and kitchens).
- 11.63 A Daylight, Sunlight and Overshadowing Assessment has been included in the

Environmental Statement submitted with the application. This approach is more sophisticated than the Council's 45 degree code and so it is considered to be more relevant (than the code) in the assessment of the proposal's amenity impacts, pursuant to Policy DM1. Given the scale of the development, and its marked change in character both within the site and wider area, this information was independently reviewed. Whilst impacts of the development on existing occupiers located outside of the application site boundary are discussed later within this report, the following appraises the impact of daylight and sunlight on the future occupiers of the development. The following provides an appraisal how the proposed full planning permission under Phase 1 would be impacted upon by the proposed development, including the impacts from the Outline Element coming forward under Phase 2 and 3.

- 11.64 For the purposes of measuring the performance of the proposed development, the assessment uses the Average Daylight Factor (ADF) and Annual Probable Sunlight Hours (APSH) methods for daylight and sunlight respectively. The applicants supporting information has concluded that in relation to the future occupiers of the site, that the majority of habitable rooms will meet the BRE guidance levels for ADF and Sunlight Distribution. It goes on to state that those that fall below the target are generally Kitchens or deep Living/Kitchen/Dining Rooms.
- 11.65 The independent review of the submitted Daylight & Sunlight, among other conclusions for the remainder of the site, has provided a review specifically to the impacts on the full planning permission element (Blocks E, C and D). The submitted information, which has been reviewed and agreed with by an independent review, states that Blocks D & E both show a reasonably good level of adherence to the daylight and sunlight guidance for new dwellings. Accordingly, it is considered that each of these blocks provide a satisfactory of accommodation in relation to Daylight & Sunlight.
- 11.66 The information submitted in relation to Block C also states that this block would perform reasonably in relation to sunlight. However, provides some concerns in relation to daylight. Specifically in relation to the ADF for Block C, the review notes that of the 59 Living/Dining Rooms and Living/Kitchen/Dining Rooms:
- 24 (41%) will meet the guideline
  - 35 (59%) will be below the guideline, of which:
    - 8 (Living/Kitchen/Dining Rooms only) (14%) are below the guideline for kitchens, but above that for living room
    - 16 (27%) are below the guideline for living rooms, but above that for bedrooms
    - 11 (19%) are below the guideline for bedrooms
- 11.67 The figures provided above clearly demonstrate that there is a shortfall in the scheme being able to provide habitable rooms within the proposed accommodation that would be acceptable in terms of meeting standard guidance. The failure to meet the above guidance comes by way of a number of issues, such as the depth of the footprint of the specific rooms, relatively narrow windows and the scale, height and proximity of proposed Block F, which would come

forward under the Outline Plan.

- 11.68 As detailed above, it is clear that there are a number of areas where the proposed planning application, by reason of its proximity to the Outline Element, would result in accommodation that would meet the guidance for access to daylight. However, in forming an opinion of the overall development, a failure to strictly comply with the guidance should not necessarily default to a refusal. Indeed the Mayor of London's Housing SPG (2016) states that an appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of developments. Guidelines should be applied sensitively to higher density development, especially *inter alia* larger sites. Furthermore, it should be recognised that fully optimising housing potential on larger sites may necessitate standards which depart from those presently experienced but which will achieve satisfactory levels of residential amenity and avoid unacceptable harm.
- 11.69 As mentioned previously, the site is a large site in the context of Harrow. Furthermore, the transitional nature of the site changing from metro-land to a more urban context, results in a development that is markedly different to the prevailing pattern of development within the area. Further to the above, the site is under pressure to perform given the constraints in place, such as being designated open space and also height restrictions (set by the MOD). The proposed layout of the comprehensive redevelopment is largely dictated by the constraints noted above along with meeting specific housing targets/tenures (discussed elsewhere). Taking the above matters into consideration, it is not surprising that there would be conflict with achieving all of the material considerations in determining satisfactory residential amenity. Section 10 in its entirety considers the quality of the residential amenity of the full planning permission of the overall development, and for the most concludes that a high quality of amenity would be achieved.
- 11.70 Based on the above, it is acknowledged that part of Block C would fail to provide residential accommodation that would meet the BRE Guidelines in relation to Average Daylight Factor. However, when balanced against the factors raised in the above paragraph, and also the other material considerations assessed within report, the overall quality of the residential accommodation within the full planning permission is considered to be satisfactory.

#### *Outline Element*

- 11.71 The Outline Permission element has provided indicative floor plans, which demonstrates that it is possible for an acceptable layout for the units. However, further details would need to be submitted to support any forthcoming Reserved Matters application to demonstrate the acceptability of the residential accommodation across Phases 2 and 3. Again, any Reserved Matters application would need to be submitted in accordance with the approved Design Code as part of this permission.

## **12.0 Amenity of Neighbouring Occupiers**

- 12.1 London Plan Policy 7.6 states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings in relation to privacy, overshadowing, wind and microclimate.
- 12.2 Core Strategy Policy CS1 B requires development to respond positively to the local context in terms of design, siting, density and spacing. Policy DM1 requires all development to achieve a high standard of privacy and amenity, and sets out a number of criteria for the consideration of the same. The Council's Residential Design Guide supplementary planning document is also relevant.

#### Visual impact/outlook

- 12.3 As noted elsewhere in this report, the application site sits within an area that is transitional in its nature. Located to the north of the application is low rise/low density residential properties, with larger commercial style buildings to the south. The commercial style buildings that are located on the western side of Northolt Road, are not uniform in height, with 6 storey and 7 storey buildings on and near the Shaftesbury Avenue junction, before decreasing to three storey before increasing again to 8 and then 9 storeys on the corner with Northolt Road being the property known as East Croft House.

#### *Full Planning Permission*

- 12.4 Proposed Blocks C, D and E all comprise part of the full planning permission element of the development. This element is located on the northern boundary along Shaftesbury Avenue, which is noted as having existing semi-detached dwellings fronting onto Shaftesbury Avenue. Proposed Block E would continue along Shaftesbury Avenue, before connecting into proposed Block D, which then turns into the application site. Proposed Block D then follows the access road into the site, before meeting into proposed Block C, which completes the 'U Shape' full planning permission element proposed Block E).
- 12.5 Proposed block E, which fronts onto Shaftesbury Avenue, is noted as sitting marginally deeper within the site than the existing properties to the west. The set back from the existing building line is proposed, as this would allow for a car parking space to the front. By reason of the setback from the front established building line, proposed block E would have a rear building line that would project beyond the rear elevations of the existing dwellings. Proposed Block E is set off the common boundary with No. 17 Shaftesbury Avenue by 3.5m, with this properties flank elevation located directly on the common boundary (single storey element). A fence would be located 2.2m from the common boundary, which would delineate the rear garden of the dwelling at this end of the development. The submitted proposed ground floor plan (1645\_DWG\_PL\_CDE\_00\_200\_PL1) indicates that the rear elevation or proposed Block E would comply with the 45 degree angle, when taken from the corner of the nearest dwelling at No. 17 Shaftesbury Avenue. This, in consideration with the orientation of the block (to the east), and its appropriate height and set off from the common boundary would ensure that it would not unduly harm the amenity of the occupiers of No. 17 Shaftesbury Avenue, or indeed the remaining occupiers on this side of the highway.

- 12.6 Opposite the application site, on the northern side of Shaftsbury Avenue, is a mix of single storey and two-storey properties. Directly opposite the proposed Block E are single storey bungalows, before stepping up to two storey semi-detached dwellings (on the opposite side of The Crescent), which would be more opposite to the larger proposed Block D. The properties along the northern side of Shaftsbury Road are characterised by having front gardens of approximately 5.0m deep. This set back and that proposed at the application site, would allow for approximately 34m between the existing front elevations of those properties along the northern side, and the proposed elevation of Blocks E and D. Firstly, Block E is considered to have an acceptable impact on the properties opposite, especially as there would only be a marginal increase in height to the properties on the southern side and located to the west. Furthermore, whilst it is acknowledged that the eaves height would be approximately 18.2m at its western end (with the maximum height of 25m a further 23m away), it is considered that the distance between these properties would mitigate any unacceptable impacts on the existing occupiers opposite the application site in terms of outlook light.
- 12.7 Proposed Block C, whilst being situated within the site, is the most likely to potentially cause harm to existing residential amenity, specifically the occupiers on the southern side of Shaftsbury Avenue (No. 17 Shaftsbury Avenue and higher). Block C would be located approximately 35m from the rear elevation of No. 17 Shaftsbury Avenue, and would commence in an easterly direction from in line with the eastern boundary of No. 17 Shaftsbury Avenue. At the most western end, proposed block C would be 15.9m at the eaves closest to No. 17, before raising to 17.4m as it moves further south away. From this location, the proposed roof form would increase up to 25m as it moves east, away from the common boundary with No. 17 Shaftsbury Avenue. The innovative roof design of proposed block C, with regard to its relationship with No. 17 Shaftsbury Avenue (and indeed the remainder of these properties) ensures that this element is at its lowest practical profile in relation to the existing occupiers. From the eaves on the western end of block C, it would then increase in height as it moves away from the properties fronting Shaftsbury Avenue. This roof design, by reason of its lowest point being in closest relation to No. 17, then increasing away from it, ensure that any impact on neighbouring properties is minimised. Whilst it is acknowledged that the proposed block would markedly change the outlook from these properties, it is considered that on balance it would be acceptable.
- 12.8 Proposed block C would result in a marked change to the local setting as it currently exists. As mentioned, this block would be located some 36m away from the rear elevation of No. 17 Shaftsbury Avenue, with the highest point (25m) angled away, and approximately 50m to the south east. Block C would result in windows and recessed balconies located within the northern elevation, which would be facing to the rear of the properties fronting the south of Shaftsbury Avenue. Generally, across Metro-land a back to back residential relationship would be approximately 21.0m. proposed Block C would nearest the common boundary with No.17 Shaftsbury Avenue, have duplex properties located on the ground & first floor. These typologies, in relation to the 36m separation distance are considered to have an acceptable impact on the neighbouring properties along Shaftsbury Avenue. The two floors above this, would each have two

windows on the western end of the north facing elevation. The proposed plans indicate that one window would be to serve a bedroom, with the second one serving a lobby entrance way. As a result, Block C would result in one habitable window located on the second and third floor that would result in overlooking to the adjacent occupiers along Shaftsbury Avenue. However the level of overlooking would not be dissimilar to the levels of overlooking that already existing in this suburban location.

- 12.9 Located to the east of the non-habitable windows (serving the lobby / entrance area, are the first of the recessed balconies, which each provide deck access to a two units each. Whilst there are recessed balconies / deck access, these elements are not design to be private amenity space for future occupiers. Private amenity space is provided by way of external balconies located on the southern elevation, facing into the remainder of the development. The arrangements as described above continue as the accommodation moves eastward, and also as the block increases in height so too does the accommodation increase across the floors. Secondary windows are located on the western flank elevation, which would look out accross the flank elevation of the proposed block B, which would come forward under the Outline element. This is considered to be an acceptable relationship.
- 12.10 Opposite the application site, on the northern side of Shaftsbury Avenue, is a mix of single storey and two-storey properties. Directly opposite the proposed Block E are single storey bungalows, before stepping up to two storey semi-detached dwellings (on the opposite side of The Crescent), which would be more opposite to the larger proposed Block D. Proposed Block E would provide a similar relationship between the properties on the northern side of Shaftsbury Avenue, as is the character across much of Metro-land. As such, it is considered that there would be no unreasonable impacts on the neighbouring occupiers through a loss of privacy or overlooking. There would however, a noticeable change as a result of the four storey height of Block D, which would have both habitable windows and inset balconies on the northern elevation, facing towards the properties on the northern side of Shaftsbury Avenue. General arrangements between residential properties across Metro-land, could expect back to back elevations to be approximately 21.0m apart. Shaftsbury Avenue is noted as being a relatively wide road within the Borough, and as such allows for a distance of approximately 34m between Block D and the existing properties on the northern side of Shaftsbury Avenue. It is therefore considered that the proposed Block D, notwithstanding the proposed four storeys of residential accommodation, the distance provided between it and the properties opposite would not result in an unacceptable loss of privacy of overlooking.
- 12.11 In support of the planning application, the applicant has submitted a Daylight & Sunlight Assessment, which considers the impact of the proposed development on existing neighbouring occupiers. The submitted material concludes that the proposed development would have an acceptable impact on neighbouring occupiers in terms of access to Daylight & Sunlight. This document has been independently review by a suitably qualified professional, who has concluded that the assumptions and conclusions drawn out in this report, in terms of impacts on external neighbouring properties, are sound. The Local Planning Authority has no



reason to disagree with this conclusion, and as such consider the proposal would have an acceptable impact on these adjacent neighbouring occupiers.

No. 15 Shaftesbury Avenue.

- 12.12 Located to the east of Block C & D, and on the opposite side of the entrance to the site from Shaftesbury Avenue, is 15 Shaftesbury Avenue. The planning history (P/2239/03) for this property indicates that it is still in use as a single family home. However, it is noted as well as having a front entrance fronting onto Shaftesbury Avenue, there is what appears to be its main entrance on the western flank elevation facing the application site. Facing proposed Block C & D, would be two habitable windows (lounge and a dining area). It is noted from the submitted under P/2239/03 that each of these rooms both have secondary windows. The lounge (located nearest Shaftesbury Avenue) has a large bay feature located on the corner of the dwelling, and a second window facing directly towards Shaftesbury Avenue. The dining room to the rear of the existing dwelling, has a secondary glazing facing into the rear garden, which is located within the rear of the existing single storey rear extension. Proposed Block C & D would be located directly west of this property, and would be approximately 40m away. It is considered that given the ample distance between the two buildings, and the retention of the large, well established trees between the two buildings, there would not be an unreasonable amount of overlooking, loss of privacy or outlook to the existing occupiers of this property.

Telephone Exchange / British Legion

- 12.13 To the east of the development site is the existing Telephone Exchange, which sits between the existing Osmond Close and the rear of the properties (70 – 80) that front onto Northolt Road. To the south west of the telephone Exchange, albeit sitting closer to Northolt Road within its site, is the British Legion. The proposed development would be set some 40m from the full planning permission element (being the corner element of Block C), and some 25m from Block J & F of the Outline Element.
- 12.14 Neither of the existing Telephone Exchange or British Legion sites are residential in nature, and as such the proposed redevelopment of the scheme would not be harmful to any residential amenity from these properties. The distance of the full planning permission is of such a distance that it would not have an unacceptable impact on properties along Northolt Road.

#### *Existing Occupiers within Phase 2*

- 12.15 Whilst not typical existing neighbouring occupiers, the residents located within Phase 2 of the redevelopment of the site would nonetheless be impacted upon by the Phase 1 element. The following existing properties comprise Phase 2 of the redevelopment of Estate:
- 46 – 90 Grange Farm Close (Blocks I, J, K, L & M)
  - 19 – 27 Osmond Close (Block D)
  - 1 – 63 Wesley Close (Blocks N, O, P, Q, R, S, and T)

- 28 – 39 Osmond Close (Blocks 1 – 2)

12.16 The existing properties of these blocks would be located to the south of the Phase 1 element of the development. It is likely that the proposed development would result in some harm to the occupiers of these units. However, it is noted that the Phase 1 element would be subject to a condition requiring a Construction Method Statement, which would go some way to mitigating construction impacts on the existing occupiers of the estate. However, any impacts by reason of the built form of the Phase 1 element, would only be temporary, as the remainder of the site is set for demolition with new housing to be provided for occupiers. It is therefore considered that the potential impacts on these occupiers would be temporary, and such acceptable.

#### Conclusion

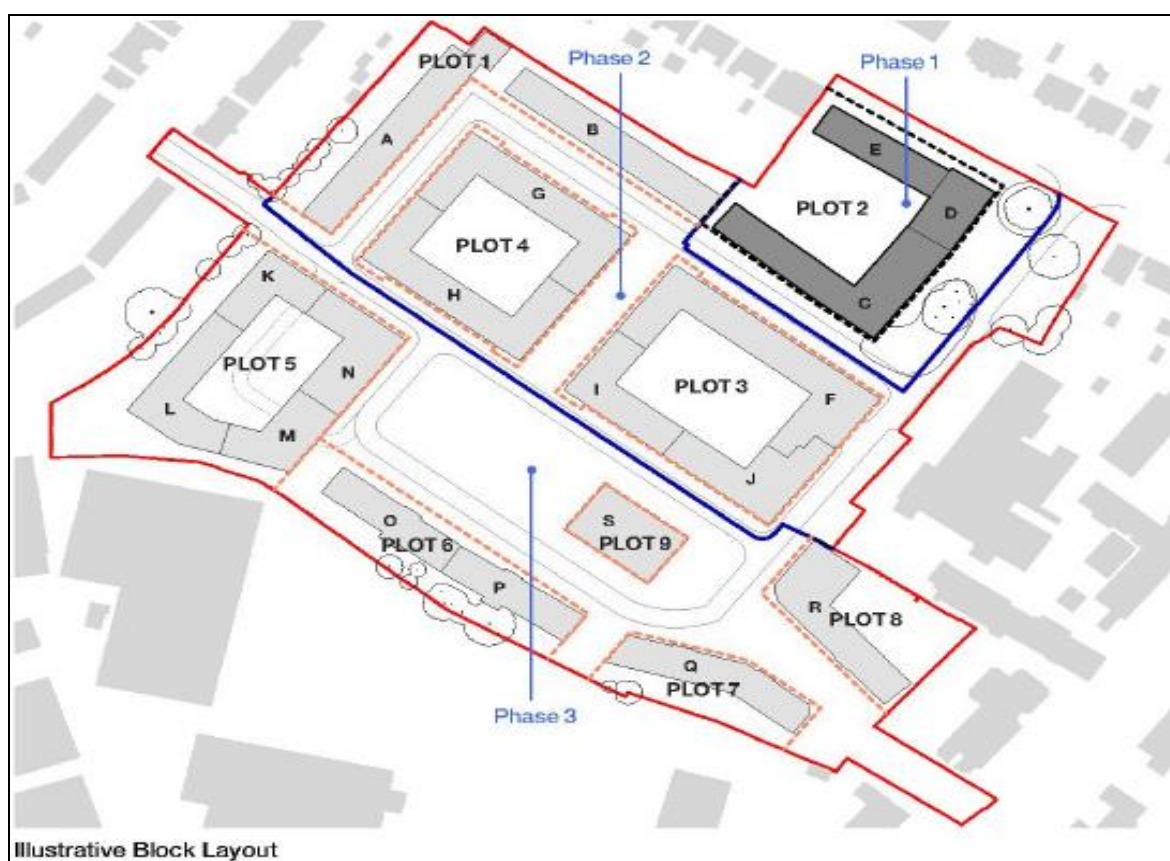
12.17 It is considered that the proposed full planning application, being proposed under Phase 1 of the comprehensive redevelopment of the site, would have an acceptable impact on the existing residential occupiers adjacent to the development site. Furthermore, any impacts felt by the existing occupiers of the site (within Phase 2 of the development), would be temporary in nature as the entire site is subject to a comprehensive redevelopment, which would result in the existing housing stock being demolished to make way for new stock.

#### Outline Permission

12.18 The remaining Blocks within the development are proposed to come forward under an Outline Permission. Other than the access, all other matters are reserved; and to be approved under a subsequent reserved matters application. However, the submitted information in support of the application provides maximum heights of the blocks that are located within the Outline Application, which are as follows;

Block	Block Type	Plot Number	Maximum Roof Height (AOD)
Block A	Metroland	Plot 1	84.82
Block B	Metroland	Plot 1	78.35
Block F	Courtyard	Plot 3	91.74
Block G	Courtyard	Plot 4	93.70
Block H	Courtyard	Plot 4	87.87
Block I	Courtyard	Plot 3	89.29
Block J	Courtyard	Plot 3	89.79
Block K	Courtyard	Plot 5	81.58
Block L	Courtyard	Plot 5	81.58
Block M	Courtyard	Plot 5	84.09
Block N	Courtyard	Plot 5	86.49
Block O	Mansion	Plot 6	85.74
Block P	Mansion	Plot 6	85.52
Block Q	Mansion	Plot 7	89.40
Block R	Mansion	Plot 8	88.50
Block S	Community Centre	Plot 9	85.10

12.19 Proposed Blocks A, B, K, and L are the blocks that are proposed under the Outline Element that have the potential to cause the most impact on neighbouring residential amenity, as they are situated along the common boundaries with the existing metro land properties. The design rationale of the development seeks to 'stitch' the proposed development in with the existing urban fabric, and as such the blocks along the rear boundaries with the existing properties fronting both Shaftsbury Avenue and Dudley Road are the lowest in height of the development. Whilst this assists with the overall design rationale of the development, it also assists in ensuring that the development would have the least amount of impact on neighbouring occupiers. The illustration below details the location of blocks across the site, and also the phasing of the development.



### Block A

12.20 Proposed Block A runs along the rear of the properties that front onto Dudley Road, on the northern side of the access into the site from Dudley Road itself. Firstly, it is noted that there is a noticeable change in level between the application site, and indeed where proposed Block A would be located, and the rear of the properties along Dudley Road. Pre-application discussions ensured that an appropriate height was set along this boundary, which would ensure that the proposed block would not result in an overbearing structure to the existing occupiers. It is noted that the distance from the rear elevation of the properties No.s 2 – 24 Dudley Road is approximately 34m, which is similar to the closest of the existing building on site. It is acknowledged that the existing building does not span the full width of these dwellings, nor is it as high. The Design Code

submitted informs the maximum height of the roof level of Plot A (84.82m [AOD]), and with a minimum distance of 33.0m to the rear elevation of the properties fronting Dudley Road. Given these two parameters, Block A would comply with a vertical degree of 25 degree, when taken from the mid-point of a ground floor rear facing window. The Design Code goes on to prescribe roof pitches, to ensure that some of the roof bulk is broken up along the width of this block. It is considered that the proposed height, bulk and proximity to the rear of the properties facing onto Dudley Road would be satisfactory, and would ensure an acceptable outlook for the existing occupiers.

12.21 Whilst proposed Block A would come forward under an Outline Application, the applicant has submitted a Daylight & Sunlight Assessment, which provides a view on the likely impacts on the adjacent residential properties. It is noted that the assumptions are based on the proposed Plot locations, and the maximum heights of the blocks. In this case, the Daylight & Sunlight Assessment concludes that there would be some windows within the properties known as No.s 2 – 24 Dudley Road that would fail to result in a pass / unaffected. The submitted Daylight & Sunlight Assessment concludes that given there are only a marginal number of shortfalls in meeting the pass requirements, and that the margin of failure is small, on balance Block A would have an acceptable impact on the adjacent properties within No.s 2 – 24 Dudley Road in terms of Daylight & Sunlight. The independent review of this assessment agrees with the assumptions and conclusions in relation to Block A and the potential impacts on access to Daylight & Sunlight.

12.22 Whilst Block A would be coming forward under Outline Permission, indicative detail has been provided in terms of internal layout and elevational treatment. In terms of proposed Block A, this element would intensify the amount of residential activity on this part of the site. Block A would result in a higher building, spanning from No.s 2 – 24 Dudley Road, which would increase the amount of habitable windows and private amenity space in proximity to these properties. The Design Code states that with Block A, ground floor units must have a private garden, and balconies are permissible at first floor and above, on both the front and rear elevation. However, any design rationale for balconies placement (under a reserved matters application), must have consideration to the privacy and outlook of neighbouring occupiers. It is acknowledged that there would be a change in the existing situation in terms of overlooking and privacy to the adjacent occupiers. However, given the constraints set out within the Design Code in terms of distance, height, and further detailed assessment of fenestration / balcony treatments, it is considered that the parameters would ensure a satisfactory impact on neighbouring occupiers.

### Block B

12.23 Proposed Block B would run along the rear of the existing properties along Shaftsbury Avenue, which has a much more level relationship. Proposed Block B would have relatively small rear gardens of 5m, with the properties along Shaftsbury Avenue having rear gardens of between 25m - 30m deep. The Design Code indicates that the rear elevation of Block B is set beyond the rear building line in relation to the common boundaries with 17 – 55 Shaftsbury Avenue,

which would result in a distance between the rear elevations of approximately 34m. A back to back residential relationship that is generally accepted as a satisfactory distance is circa 21m, although noted as generally having a more balanced split in percentage of making up this distance between two properties. In this instance, it appears that Block B would have a rear garden ranging from approximately 4m to 8m, with the properties facing Shaftesbury Avenue contributing the most of the rear garden gap (being approximately 25m plus). However, the acceptability of this (or not) can be considered in isolation of just the shortness in depth of the proposed gardens.

- 12.24 Proposed Block B would have set parameters as detailed within the Design Code. Block B is restricted to being the lowest in terms of all the blocks to come forward under the Outline Permission phase, as this is required to stitch in most closely with the Metro-land development to the north. Block B would predominately be two storey, with the potential to include some three storey elements (at a much less frequent level), within the block. Given the restriction in height, and the prescribed roof forms (to conform with Arts & Crafts Style Architecture), it is considered that the proposed development, in conjunction with the distance between the rear elevations and those fronting Shaftesbury Avenue, would ensure a satisfactory relationship as to not unreasonably harm outlook to the adjacent occupiers.
- 12.25 The Daylight & Sunlight Assessment submitted in support of the application concludes that the properties fronting onto Shaftesbury Avenue would not be unacceptably impacted upon in terms of access to daylight and sunlight. The independent assessment of this concurs with the assumptions and conclusions made within the assessment. It is therefore considered, that subject to compliance with the Design Code, there would be no unacceptable harm to the existing adjacent occupiers along Shaftesbury Avenue, in terms of access to daylight and sunlight.
- 12.26 The introduction would result in an intensification of the residential use in this part of the application site, bringing it into a much closer proximity to the existing neighbouring occupiers. as mentioned previously, Block B is the lowest of the proposed buildings, as it is required to be the first 'stitch' within the development site, ensuring its connection to the metro-land development to the north. By reason of this, it ensures that development is predominantly two storeys, with only a marginal increase to three storeys at a much lesser frequency. Furthermore, the Design Code does not allow for balconies within Block B, thereby restricting the only amenity space to be the rear garden. It is therefore considered that subject to compliance with the parameters as set out in the Design Code, and the generous distance between rear elevations, proposed Block B would result in a development that would not unacceptably harm the existing adjacent occupiers facing onto Shaftesbury Avenue by way of overlooking or loss of privacy.

#### Blocks K & L

- 12.27 Proposed blocks K & L are located on the opposite side of the access way to the development site from Dudley Road from proposed Block A. These two blocks

are proposed to come forward under Outline Permission, and would be in the Courtyard Design typology. In terms of potential impacts on neighbouring amenity, it is proposed Blocks K & L, located within the southwestern corner that may have impacts on neighbouring occupiers. Directly to the west of these proposed blocks are No.s 28 – 50 Dudley Road. Similarly with Block A, there is a change in level between proposed Blocks K & L and those adjacent properties fronting onto Dudley Road. Again, Blocks K & L would be set off the common boundary by approximately 8m – 10m, and in conjunction with the rear gardens of the Dudley Road properties, would exceed 33m in almost all instances between rear elevations. Furthermore, the overall height of these two blocks would be lower than that set by Block A, and would be no higher than 81.58m (AOD). It is considered that subject to compliance with the parameters set out within the Design Code, proposed Block K & L would have an acceptable impact on the outlook of the adjacent residential occupiers fronting onto Dudley Road.

- 12.28 The submitted Daylight & Sunlight assessment identifies that the proposed Block K & L would result in noticeable impacts in terms of access to daylight and sunlight. With regard to daylight access levels, proposed Block K & L would result in three windows with a noticeable decrease in Vertical Sky Component (Less than 10.8%) and with one with a reduction of greater than 60% reduction. Whilst it is acknowledged that there is a decrease to noticeable levels as a result of K & L, when taken across the entire scheme, 90% of all windows tested meet the BRE guidance, which demonstrates a high level of compliance in an urban context. With regard to daylight distribution across the entire development, the vast majority of rooms would continue to meet the BRE guidance. Only 13 out of 440 rooms would have any noticeable effect, which equates to 3% of the overall assessment. The independent review of the Daylight & Sunlight Assessment agrees with the conclusion that on balance the impact on adjoining residential occupiers would be acceptable. The Local Planning Authority agree with this position.
- 12.29 The design code ensures that there are no balconies permissible along the western elevation of Block K & L, although it is noted that the north-western corner of block K would have an expressed corner; which would involve recessed balconies. The Design Code goes on to confirm which elevations of the courtyard typologies would be permissible to have balconies, with no balconies permissible on elevations that face externally from the site towards existing residential properties. Proposed Blocks K & L would likely result in habitable windows facing west towards the properties fronting onto Dudley Road. It is acknowledged that there would be an increase in overlooking by reason of the location and proximity of blocks K & L. However, it is noted that there would still be a back to back elevation distance of no less than 30m. It is considered that the proposed four storey Blocks K & L would, by reason of separation distance of 30m, and the restriction of balconies along this elevation, would ensure that there is no unacceptable impact on the amenity occupiers of the adjacent Dudley Road by way of overlooking or loss of privacy.
- 12.30 Proposed Blocks Q and R are located in the south eastern corner of the site, where they would be located to the western end of the revised access from Northolt Road. Each of these two blocks would be seven storey, mansion block

style buildings. To the south east of these two proposed blocks, are 82 and 86 Northolt Road, which are seven and eight storey residential buildings respectively. Again, the submitted daylight and sunlight assessment details that there would be some impact on the units that would be facing towards the development. This element of the proposed scheme would be situated within the south-western part of the site, which is where the development increases in its height and density to reflect the character of the properties along the western side of Northolt Road. This element would result in the two buildings having the 'flanks' of the blocks facing the adjacent buildings, which would therefore ensure that it is the narrower part of the building facing these buildings; rather than the much wider front or rear elevation.

12.31 Whilst it is acknowledged that there would be some loss of daylight to the properties known as 82 & 86 Northolt Road, it is considered that on balance across the entire development, and the amount of the identified shortfall would be acceptable. Again, given the more urban character of the properties fronting onto Northolt Road, some flexibility should also be applied. The submitted supporting detail (and concluded by the independent review), confirms that No.s 82 & 86 would continue to receive a satisfactory amount of sunlight. It is therefore considered that the proposed development would have an acceptable impact on daylight and sunlight in terms of these neighbouring occupiers.

12.32 The remainder of the blocks are either within the middle of the development, or not sited adjacent to residential properties. i.e. Waitrose Supermarket. Accordingly, it is considered that the remaining blocks would not have an unacceptable impact on the neighbouring residential occupiers.

12.33 Lastly, it is noted that the proposed development that is coming forward under the Outline Element would be subject to the height restrictions set out both in this report and the Design Code. Subject to compliance with the Design Code, it is considered that the proposed buildings within the outline element would be acceptable.

#### *Overshadowing of amenity spaces*

12.34 The applicant's assessment also includes an analysis of the sunlight and shadow impacts to open space across the development site, being both private and public open space. The impacts are discussed elsewhere within this report.

#### *External noise, vibration, dust, air quality and light pollution*

##### *Noise*

12.35 In support of the application, a noise report has been submitted, which seeks to establish the existing environmental sound levels by means fully automated noise monitoring over a period of at least 24 hours and for four measurement positions. The report goes on to suggest the appropriateness of the site for residential use, and what (if any) mitigation measures should be set in place.

12.36 With regard to the existing situation, the dominant noise source of around the site

was by result of road traffic noise. The submitted noise report provides more detailed information in relation to the full planning permission element, being blocks C, D, and E. The submitted noise report has found that the development proposed as Phase 1 is suitable for residential development, and subject to the use of appropriate materials, would ensure adequate residential amenity for future occupiers in terms of noise impacts. The submitted noise reports concludes that with regard to the Outline permission for Phase 2 and 3, the future occupiers would not be adversely impacted on by way of noise nuisance.

- 12.37 In terms of temporary noise by way of construction noise, it is acknowledged that there will be disturbance caused to neighbouring occupiers (and the subsequent phases of the development site). Unfortunately, noise nuisance, among other impacts, are unavoidable in any development. Accordingly, mitigating potential impacts to minimise harm to neighbouring occupiers is critical. Accordingly, it is considered that a Construction Method Statement be submitted as part of the full permission, which requires the applicant to put forward mitigation measures to alleviate potential impacts on, among other things, residential amenity. Subject to such a condition, it is considered that the development would have an acceptable impact on existing and future occupiers in terms of noise concern.

#### *Air quality*

- 12.38 Harrow Borough in its entirety is located within an Air Quality Management Area (AQMA). Policy 7.14B of the London Plan seeks to minimise exposure to existing poor air quality and make provision to address local problem of air quality. It goes on to state *inter alia*, measures to reduce emissions during demolition and construction; proposals to be 'air quality neutral' and not to lead to further deterioration in air quality; ensure on-site provision of measures to reduce emissions; and assessment of the air quality implications of biomass boilers. Policy DM1 (D.h) of the DMP also reinforces the view of assessing the impact of proposal on *inter alia* vibration, dust and air quality.
- 12.39 The application is supported by an air quality assessment, which describes the existing air quality of the site / area, and a consideration of the appropriateness of the suitability of the site for residential use and the construction phase.
- 12.40 The existing site is currently in use as a residential estate with a small community centre located on the site also. The submitted air quality assessment concludes that during the construction phase, there is the potential for dust nuisance. Following on from the construction phase, it is concluded that long-term NO<sub>2</sub> objectives are predicted to be exceeded at one existing residential receptor, although this would be exceeded whether or not the development was implemented or not. In terms of potential impacts from road traffic emissions, this is considered to be within acceptable tolerances. The submitted air quality assessment does state that further detail would be required once the specific details of the energy centre have been finalised, which would require dispersion modelling, and to ensure that an adequate stack height is provided
- 12.41 It is considered that the application site is appropriate for residential development. However, the Environmental Health Department has requested further



information, prior to supporting the application. At the time of writing this report, the requested information has not been provided, however, is intended to be submitted and reported to the Planning Committee via an addendum.

### *Lighting*

- 12.42 The landscaping would be supplemented by a site wide lighting strategy. At this stage, this is only set as high level detail, with a comprehensive lighting document to be submitted under any forthcoming Reserve Matters application. However, it is noted that the lighting strategy would need to be developed in line with Council requirements, specifically in relation to where the lighting would be associated with the internal highways that are intended to be passed over for adoption. Furthermore, lighting would need to be developed in consultation with the MET Police (Secure by Design) to ensure that the development would not give rise to secure by design issues / fear of crime.

### *Conclusion*

- 12.43 There is no reason to believe that lighting of the public realm and other areas within the development would cause any significant nuisance to neighbouring occupiers. It is proposed to control, as a condition of any planning permissions, details of the ventilation/extraction equipment and other plant associated with the development, to ensure that any noise, exhaust and vibration is mitigated and does not give to unreasonable nuisance to residential occupiers within or surrounding the development.

## **13.0 Character and Appearance**

- 13.1 The National Planning Policy Framework (NPPF) was published by the Government on March 27<sup>th</sup> 2012. The NPPF does not change the law in relation to planning (as the Localism Act 2012 does), but rather sets out the Government's planning policies for England and how these are expected to be applied. It remains the case that the Council is required to make decisions in accordance with the development plan for an area, unless other material considerations indicate otherwise (S.38(6) of the Planning Act). The development plan for Harrow comprises The London Plan 2016 [LP] and the Local Development Framework [LDF].
- 13.2 The NPPF states (paragraph 64) that 'permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions'. The NPPF continues to advocate the importance of good design though it is notable that the idea of 'design-led' development has not been carried through from previous national policy guidance to the National Planning Policy Framework.
- 13.3 The London Plan (2016) policy 7.4B states, inter alia, that all development proposals should have regard to the local context, contribute to a positive relationship between the urban landscape and natural features, be human in scale, make a positive contribution and should be informed by the historic environment. Core Strategy policy CS1.B states that 'all development shall

respond positively to the local and historic context in terms of design, siting, density and spacing, reinforce the positive attributes of local distinctiveness whilst promoting innovative design and/or enhancing areas of poor design’.

- 13.4 Policy DM1 of the DMP gives advice that “all development proposals must achieve a high standard of design and layout. Proposals which fail to achieve a high standard of design and layout, or which are detrimental to local character and appearance, will be resisted.”
- 13.5 The application is currently an anomaly within the context of the surrounding urban fabric. Whilst it is currently in a predominant residential use, much like the properties to the north and west of the site, the design rationale of the existing, being a 1960s resi-form development, is substantially different to the traditional metro-land development. To the south and east of the application site is a more commercial, denser development character. The overall design rationale for the development has been to ‘stitch’ the development into the existing urban fabric. To this end, the development should have a lower density to the north-west of the site, and then becoming more dense/higher as it moves south-east towards Northolt Road.

#### Full Planning Permission

- 13.6 The full planning permission element relates to Blocks C, D and E, which are located on the Shaftsbury Avenue boundary, and provide a ‘U’ shaped element in this part of the site. This is detailed as Phase 1.
- 13.7 Block E is proposed to run parallel with Shaftsbury Avenue, and would be adjacent to the existing semi-detached dwelling at No. 17 Shaftsbury Avenue. As mentioned previously this block would sit back beyond the established front building line, as set by the properties along the southern side of Shaftsbury Avenue. By reason of this setback, Block E would also sit back beyond the rear elevations of these properties. Generally speaking, new developments within a streetscene should respect the established building line, which in this instance would not be. However, it is firstly noted that this one block, is part of a comprehensive redevelopment, and also forms part of two other blocks under the full planning application element. Accordingly, whilst Block E is one block, it must also be read in conjunction with Blocks D and C.
- 13.8 Proposed Block E is characterised by being a two-storey block, which would have accommodation within the roof space. The roof space accommodation is characterised by dormers within the front and rear roof space. When viewed in relation to the existing dwelling at No. 17 Shaftsbury Avenue, the proposed terrace would sit approximately 2.0m higher than the existing metro-land units. Therefore, a marginal setback from the established building line in this instance would be acceptable, as this would ensure that the extra height in relation to the existing housing stock (predominantly in relation those to the west). Whilst it is noted that the proposed front building line with the properties to the south-east, there will continue to be a public highway (Grange Farm Close) providing a visual gap between the proposed and existing. This visual break, in conjunction with the comprehensive redevelopment of the site, and in particular the marked change to

this corner, would not appear as overtly at odds with the existing building line.

- 13.9 Proposed Block E in terms of its relationship with the adjoining property, is considered to be acceptable. Furthermore, it is noted that the setback would allow for each of the eight units fronting Shaftsbury Avenue to have a car parking space in front of the dwelling, and also a contained bin store. This is considered to be a strong characteristic within the area, and as such this set back, allowing for these provisions, would be consistent with the prevailing pattern of development in this area.
- 13.10 From an elevation treatment point of view, the roof pitch and treatments of the elevations would be similar to that which is found commonly within the surrounding metro-land. Where proposed Block E differs is that it provides front dormers, which are not a common feature within the wider area. However, this element is still an integral component to the overall comprehensive development, which has an underlying design rationale with respect to Arts and Crafts style architecture. Accordingly, the expressed dormers are considered to accord with the design rationale of the development, and would continue to be consistent with the remainder of the development.
- 13.11 The southern elevation of Block E would face into the courtyard, which is created by the 'U Shape' of Plot 2. Again, a legible ordering of the fenestration and proportionate rear dormers ensure that this is a simple, yet effective design rationale to these properties. The proposed design would be reflective of the proportions and simplicity of the surrounding metro-land character found to the north and west of the site. Whilst materials are discussed in further detail later, it is noted that the rear elevation would not be the same as the front brickwork, rather a much lighter brick to assist in ensuring the courtyard area does not become a dark and dysfunctional space for future occupiers. From a character and appearance perspective, there is no objection to such a treatment.

#### Proposed Block D

- 13.12 Located on the eastern end of proposed Block E is the larger Block D which sits on the corner of Shaftsbury Road and Grange Farm Close. It is at this juncture that there is a noticeable change in the height of Block D in relation to Block E. Standing directly opposite the proposed development, Proposed Block D would be five floors of residential use. In order for this block to achieve the necessary quantum of residential units, the block increases in height (as one travels into the site via Grange Farm Close) up to six floors with a larger roof scape above to provide for plant etc. To ensure that this block would continue to relate well to Block E, and also to the existing streetscene, the applicant has utilised an innovative roof design, which results in a pitch increasing as it moves away from Shaftsbury Avenue, and also as it moves away from Block D. With regard to the relationship with Block E, the innovative roof design of Block D ensures that the eaves are drawn down as far as possible, whereby allowing less of an expanse of an elevation where these two blocks join. The use of this roof form, whereby minimising the exposed elevation of block D, ensures that the change in height does not appear overly jarring when viewed from the east of the site. Furthermore, it assists in the two blocks appearing to sit together more

comfortably, rather than as two completely separate blocks.

- 13.13 Proposed Block D forms the entrance to the comprehensive development, and as such is a key corner which needs to be expressed accordingly. The extra height of this element makes a statement, and gives legibility to the entrance of the site. However, the innovative roof design ensures that this block (and indeed Block E), in conjunction with the setback from the established building line, would not appear overly prominent or overbearing within the existing streetscene. Furthermore, the relationship between proposed Blocks E and D would be appropriate.
- 13.14 From an elevational perspective, proposed Block D will continue (outwardly facing) to utilise a similar material as Block D. Whilst materials will be discussed later in more detail, this approach provides a consistency between the two blocks. Block E would have a low half height plinth running through the ground floor, however, this would be lifted to the entire ground floor within Block D. Given the extra height in Block D, the ground floor plinth height is considered appropriate, and ensures that a strong legible base to the Block is provided. An ordered fenestration is provided on the northern elevation. Lastly, a detailed lift over run is provided within the roof slope. This element is detailed and would appear as a chimney feature in most arts and crafts style dwelling, albeit on an appropriately scale in relation to the roof scape in which it would sit.
- 13.15 Proposed Block D also has an elevation that would front onto the main access into the site off Shaftsbury Avenue, being Grange Farm Close. As mentioned previously, the roof slope would rise up to a maximum height of 25m (above ground floor), where it would join into proposed Block C. The proposed plans indicate that there is a slight tonal shift in the brick type within this elevation, which would allow a distinction between the two blocks. With regard for the purpose of the assessment of the elevation, both Block C and D are able to be considered as one.
- 13.16 This elevation would be set back from the Grange Farm Close by approximately 15m. The driver behind the set back from the Grange Farm Close public highway was to retain a number of high quality trees that are located on this corner. The setback of this elevation, assists in ensuring that the height of this building would not be overbearing on users of the public footpath into the site. Furthermore, by being set back and allowing the retention of the mature trees, these trees would offer some screening of the development which would assist in softening its appearance in the wider area.
- 13.17 Each of the corners at each end of this elevation would have winter gardens, which would afford future occupiers more privacy. Furthermore, the winter gardens would turn the corners of the building at each end, whereby providing some interest at these highly visible points of the elevation. Along the elevation fronting the existing Grange Farm Close, the ground floor plinth would continue for the full length of the elevation. It would increase to double height above the communal access buildings (and to the rear garden area/cycle storage). The stepping up of the plinth at these points provides legibility to the elevation, and enables clarity to passer-by's as to where the main entrance to this element of

the development would be. It is noted that there are some individual units that are accessed directly from the ground floor from Grange Farm Close. These are legible within the streetscene as small amenity gardens are provided adjacent to the front door. Above, the fenestration and cantilevered balconies are arranged in an ordered fashion, which ensure that the elevation would not appear fussy or contrived when viewed from the wider public.

- 13.18 Similarly to the rear of Block E, the rear elevation would also be finished in a much lighter brick finish. Whilst this would assist in the amenity of further occupiers utilising the courtyard, it does provide a contrast to the use of the darker brick, which is utilised on the outward facing elevations of the block. The submitted information demonstrates again that there would be an ordered logic to the placement of the fenestration on this elevation, along with the placement of external balconies. Firstly, the ordered logic to fenestration/balconies is considered appropriate as it ensures that this elevation does not become a fussy and contrived elevation. In conjunction with this, and subject to a condition relating to the final material palette, proposed reveal depths, the proposed elevation would not appear as a blank and uninteresting façade. As mentioned, a condition would be attached to the full planning permission element, to ensure that each material used would be appropriate, and also when viewed together as a complete elevation.

#### Proposed Block C (Return Element)

- 13.19 Proposed Block C, (other than sitting adjacent to Block D and as detailed above), would at its southern end, run parallel with Block E and Shaftsbury Avenue as a return block. Firstly, it is noted that Block C would sit much closer to the public highway than it does at the initial entrance into the site. Whilst this element of Block C would sit much closer to the public highway than where it connects with Block D, it is noted that once this corner has been turned, there is a distinct change in the character of the area from that which exists around the entrance to the site. Block C is a Courtyard Style building, and in this location, with the proposed blocks of the Outline Application opposite, being Block F, the responds to what the character of the internal element of the site would be. Given this, it is considered that the proposed Block C would have an acceptable impact on the streetscene within which it would sit, as a result of the relationship with the proposed buildings under the Outline Application.
- 13.20 As mentioned previously, the southern end of Block C (where it adjoins Block D) would have winter gardens. This corner is considered to be a prominent location within the development, and as such this corner is expressed accordingly. It is noted that the return run, at the western end is a floor lower and also drops down to relate better with the proposed Block B (under the Outline Permission) which would be two and three storeys in height. Furthermore, this would not be a prominent corner within the site, and therefore it is not required to be either detailed or expressed in the same manner as the other end of the elevation.
- 13.21 The ground floor plinth would be carried on for the entire length of the elevation, and again would rise to double height to provide legibility of communal entrances. Again, a number of individual accesses would be provided into this elevation, for

the duplex units that would be located within this element. Individual doors would be located within the elevation, and small doorstep gardens would provide some legibility to this elevation to assist in recognising private entrances. The small doorstep gardens also assist in providing a more human scale appearance at ground level, whereby assisting in ensuring that the elevation does not appear overbearing to users of the public highway/footpath.

13.22 Aside from the fenestration and arrangement of the residential opening/balconies along this elevation, waste & recycling facilities would also be along this elevation. This element is fully enclosed and opens out onto the internal road for ease of servicing. The proposed enclosure would have an acceptable appearance, with hit and miss brickwork, to provide both ventilation to this area and also a satisfactory appearance within the streetscene.

13.23 As mentioned above for blocks E & D, the rear elevation would primarily be finished with a lighter brick than that used on the front elevation. Whilst proposed block C is of a Courtyard design like block D, it varies along the rear elevation by having deck access rather than a double loaded core. These would be located from the second floor and above (above the duplex units). The result of this from an appearance point of view would be that there would not be any projecting balconies on the northern (rear) elevation of block E, rather an inset deck balcony arrangement. whilst there would not be any projecting balconies, the recessed deck access along this elevation would provide large recesses within elevation, and in conjunction with the depth of the window reveals, would again ensure that this elevation would hold sufficient visual interest, and not appear as a bland and uninteresting elevation.

#### Cumulative impact of Plot 2

13.24 Proposed Blocks C, D and E create a 'U shaped' element within the overall redevelopment of the site, and is known as Plot 2, to be carried out in Phase 1. Cumulatively, this element attempts to tie in with the surrounding metro-land character to the north and west, before turning into the site and changing in character to a much more intense form of development, provided by the Court Yard elements of the scheme. Whilst not necessarily a consideration in terms of any assessment against the character and appearance of this element, its scale of development is also dictated by the phasing programme associated with the development. Notwithstanding that, Plot 2 must be considered on its own merits.

13.25 Further to the individual block considerations above, it is considered that the proposed Plot 2 would provide a development that would, whilst noted as being markedly different from the surrounding environment, provide a successful integration between the metro-land to the north and west, and what is anticipated to come forward as part of the Outline Element of the comprehensive redevelopment of the site. It is considered that the innovative roof design provides a successful link between the metro-land element (Block E) and the much larger in scale Court Yard elements (Blocks C & D) to Plot 2. Sitting within the proposed roof form would be two lift over runs, one each within Block C and D. the submitted information indicates that these would be detailed in brick with projecting headers, to provide a chimney like feature. The up scaled design of

these two elements still relies on the Arts & Crafts influence, and therefore the lift over run, with its chimney like appearance would be a proportionate and positive addition to the development.

- 13.26 It is considered that the proposed layout, bulk, scale and height of the proposed development, notwithstanding the change in character of the proposed development, would not result in an unacceptable impact on the character and appearance of the existing site, streetscene, or wider area.

### Materials

- 13.27 The proposed detail for Plot 2, being the full planning permission element, provides a commentary of the materials that would be used across the Blocks. The rationale in terms of materials would be to have a much darker brick type and facing materials on the outward facing elevation of the Plot, which would reflect both the Metro-Land and Arts & Crafts architectural styles. Across Plot 2, the materials would be similar within each of the three Blocks, which would assist in providing a legible connection to them all, and enable them to be read as being a cohesive development, even with the contrasting design difference.
- 13.28 The materials suggested within the submitted information with relation to the Full Planning Permission, would be of a high quality finish and appearance. Whilst a specific brick type has not been selected at this stage of the proposal, the brick (along with all materials) would be subject to a safeguarding condition. However, it is noted that the windows, access doors, rainwater goods, and projecting balconies are identified as being of an aluminium finish. This indicates that the proposed development intention to use a high quality (and sustainable) material would ensure that a high quality appearance would be achieved for the scheme. This is particularly important especially where Blocks C & D are of a much higher scale, and to ensure that their appearance remains of a high quality when they are much more prominent in the wider area.
- 13.29 As mentioned previously, there would be a marked difference to the materials selected for the outward facing elevation of Plot 2, in comparison to the elevations that are internally facing. Whilst it is acknowledged that there is a direct contrast in the choice of materials, the commentary confirms that the quality of the material would still be of a high standard.
- 13.30 It is considered that the proposed materials detailed in the submitted information confirm that the proposed development would be built at to a high quality, which would complement the innovative design of the Plot. The use of high quality materials are integral to the success of the design as put forward. It is therefore considered appropriate that a safeguarding condition be imposed, to ensure further details are provided with regard to the final material choice. Material boards should be provided to ensure that not only are the individual materials appropriate for the scheme, but when put together they would successfully complement each other.

### Access/Entrances

- 13.31 Proposed Plot 2 is comprised of two typologies of access, being individual unit access and also communal. As mentioned previously, the individual units, are within Block E, and then some within Block C & D. Block E accesses are set well back from Shaftsbury Avenue, as the frontage of these units provide for an car parking and would appear similar to the existing properties along Shaftsbury Avenue. The individual entrances within Block C & D are set back within the elevations, to ensure some relief (particularly along Block C) from the public highway/footpath when accessing individual properties. Furthermore, small doorstep gardens are provided outside each of the individual properties, which also assist in providing a visual barrier from the streetscene and also legibility within the elevation as to where the individual entrances are located.
- 13.32 The communal entrances to the remainder of the flats are firstly detailed by having a double height plinth above the entrance way. Furthermore, each of the communal entrances would have a chamfered entranceway, which further provides legibility within the elevation, that these points are the primary accesses to Plot 2. The double height communal accesses to Plot 2, also provide access through to the communal garden/courtyard to the rear of blocks.

#### Waste and recycling

- 13.33 The proposed plans indicate waste and refuse would be provided within Phase 1, with three communal facilities provided for Block D (one facility) and Block C (two facilities). It appears that there is sufficient space provided to allow for the flats to be adequately serviced in relation to the flatted units within these blocks. Block E, which runs parallel with Shaftsbury Avenue, would have individual facilities as there are set out as single family houses.

#### Landscaping

- 14.0 The Grange Farm Estate, insofar as any of the existing land which is not currently built upon, is designated within the Local Plan as being Open Space. The Open Space on the site provides for the only meaningful landscaping on the site, however, it is noted that it is in extremely poor condition and does not have a high uptake in use. Elsewhere within this report, landscaping has been discussed in conjunction with the retention of open space, provision of child play space. However, the following provides a specific assessment of the landscaping provision.
- 14.1 As part of the full planning application, which includes the Plot 2 (Phase 1) element, it is also proposed that communal Landscaping for the entire site be considered through the detailed application. The communal landscaping areas within the Blocks coming forward under the Outline Element are not being considered as part of the overall assessment of landscaping, as the Blocks have yet to have their internal layouts resolved. Accordingly, it would be unreasonable to fix the internal landscaping arrangements until this has been resolved under a Reserve Matters application. Any forthcoming Reserve Matters application would be subject to a Design Code, which has detail in relation to the internal communal (private) landscaping. As such, any consideration for the landscaping for Plot 2 and the public realm, will be considered comprehensively below.



### *Proposed Plot 2*

- 14.2 Proposed Plot 2 is located in a 'U' shape layout, which would run parallel with Shaftesbury Avenue, before turning into the site along the existing Osmond Close. As part of the landscaping component for Plot 2, this would include the internal courtyard area, and also some of the area on the outside of the three Blocks. Looking at this element of the proposed development holistically, there needs to be an appropriate balance between the hard and soft landscaping arrangements. The internal courtyard for Plot 2 has been identified as a Bee and Butterfly Garden. This courtyard is intended to provide a high quality habitat for invertebrates including nectar feeding species such as bees and butterflies, a mix of shrub, bulb and perennial herbaceous species, as well as a damp marginal habitat to create seasonal variety. The soft landscaping is broken up with hardstanding, which is detailed as resin bound gravel. A significant portion of this area would also be set aside for play space, with this element finished in rubber crumb play surface. Lastly, the rear private gardens are indicated as exposed aggregate concrete slab. On the face of it, there appears to be a high quality area for future residents of this block, and indeed the wider development as a garden area.
- 14.3 When reviewing the materials strategy for this internal courtyard, it is clear that the balance of soft and hard landscaping is not satisfactory. Whilst there is no objection to the material palette per se, it is the amount of hard standing in relation to the soft landscaping that causes concern. The submitted information indicates that this entire area is set as a Bee and Butterfly garden, however, it is considered that the 'soft landscaping' garden element is indeed very much the minority. The play space provided appears as one of the largest singular materials within the courtyard. It is noted elsewhere within the report that the amount of child play space is excessive (exceeding the quantum set by both the LPA and GLA), which has a direct bearing on the amount of soft landscaping that is able to be provided within the site. As such, it is considered that the proposed courtyard area of Phase 1 does not strike an acceptable balance, with hard standing dominating this area, and therefore failing to provide a satisfactory provision of soft landscaping to enhance the development.
- 14.4 Of the proposed soft landscaping within the Courtyard, there is no objection to the types of planting that is proposed here. However, this would still be subject to an appropriate landscape management plan accompanying the soft landscaping to ensure its ongoing success.
- 14.5 Given the above, it is considered that the courtyard element of the Phase 1 development does not have an appropriate balance between the hard and soft landscaping, to the detriment of this communally accessible element of the scheme. Notwithstanding this, there is capacity to deliver a satisfactory landscaping provision into this element of the development, which would find a better balance between the hard and soft landscaping. Accordingly, it is

considered appropriate that a condition be attached to the full planning permission element to receive a revised landscape plan for this area.

- 14.6 Whilst outside of the courtyard area, but very much linked to Phase 1, is the front garden areas to Block E which fronts onto Shaftesbury Avenue. These areas are noted as being the private front gardens, which would provide an off-street car parking space, and finished as concrete block paving. Located between each of the car parking spaces, the landscaping strategy identifies that defensible planting strip. The proposed treatment of the front of this block would result in a significant amount of hardstanding. However, given the mixture of front gardens within this part of the Shaftesbury Avenue, this would not appear alien. However, it is not clear that these would be finished in a permeable material. Accordingly, it is considered that the full planning permission element should demonstrate that the parking along this section is permeable.
- 14.7 The remaining landscaping would be detailed within this next section. However, in relation to the full planning permission (Plot 2), it is considered that there is an imbalance between the hard and soft landscaping on the site. Notwithstanding this, subject to a condition requiring a revised landscape plan, this element would be acceptable. Lastly, a condition requiring a landscape management plan would be required, to ensure the ongoing success of the landscaping (both hard and soft) for the site.

#### *Public Realm*

- 14.8 As mentioned previously, the assessment of the landscaping component under full planning permission is limited to that which is public realm, and does not include the internal courtyards. The revisions that the proposed scheme has gone through, has unfortunately resulted in a noticeable decrease in the amount of soft landscaping across the site. As mentioned previously, there is concern that there is an imbalance across the site of the amount of soft and hard landscaping, with there been an over reliance on hardstanding. Again, there is concern that there is an overprovision of child play space across the development, which may be able to be reduced to enable an increase in the amount of soft landscaping for the site. Otherwise, given the development pressures on the site, there is little scope to decrease the amount of hard standing across the site. Indeed, the remainder of the site is having to work very hard to provide for the remainder of the soft landscaping.

#### *Highways*

- 14.9 The suitability of the internal Highways, from a safety and functioning perspective, have been discussed elsewhere within this report. However, in terms of the materials to be utilised in the finishing of these elements, these have been detailed within the Design & Access Statement. The proposed materials would be appropriate insofar as the internal highways, as they would be of a material that would be representative of what its use and function is. Furthermore, the materials have been selected from a palette that would be acceptable to the Highways Authority, who would be adopting these in the future, and as such would need to be maintained etc. It is therefore considered

that the proposed highways material would be acceptable.

### *Car Parking*

- 14.10 Across the entire development, it is proposed to provide 261 car parking spaces across the site. Again, there must be a satisfactory balance in providing sufficient car parking for the development (considered elsewhere within this report), whilst ensuring that there would be sufficient soft landscaping to break up the hardstanding. To ensure that hardstanding is sufficiently broken up, some form of meaningful soft landscaping ought to be in place for every 4 – 5 car parking spaces. It is noted that there are a number of locations across the site that result in an unacceptable amount of uninterrupted hardstanding. Further soft landscaping should be incorporated into these areas to both enhance the appearance of the development and to also assist in improving the ecological offer of the site. However, it is noted that whilst there are aspirations to improve both the quantum and quality of soft landscaping onsite, and reduce the amount of hard standing, a balance must also be struck in achieving a satisfactory level of car parking to serve the development. As discussed elsewhere within the report, the quantum of car parking has been assessed, and considered to be an appropriate level for the development. Whilst an increasing the amount of soft landscaping would provide numerous benefits to the scheme and wider area, the reduction of car parking may well lead to harmful highway safety and functioning impacts, potentially leading to the scheme becoming unable to be supported. Therefore, on balance. It is considered that the balance between the hardstanding associated with car parking, and the soft landscaping of the site, in this instance, is acceptable.
- 14.11 Further to the balance of the hard and soft landscaping, the proposed materials are considered acceptable. The submitted materials would appear consistent with the use and function that they are intended to perform.

### *Public Spaces*

- 14.12 Across the site, are number of public spaces, which are available to be used by both residents of the site and also the wider population. The Village Green is the main focal point of the site, and provides both formal and informal recreating space. Nonetheless, this is provided for a place of relaxation for visitors to the site. Again, this area has been reduced in size as it now proposes to cater for a MUGA and formal children's play space. Again, the amount of formal play space reduces the amount of soft landscaping of the site, and calls into question the balance of the hard and soft landscaping of the site.
- 14.13 Located to the east of the Village Green is the proposed Community Centre, which to the east of this again is Grange Square, extending further south to the between Blocks Q and R. Again, this area is heavily set out in hard standing. This entrance from Northolt Road has been proposed to be opened up to provide a long view into the site, with the Community Centre visible from the entrance of the site. However, the large expanse of hardstanding fails to enhance the development, and again does not provide the Ecological benefits that could be achieved with further soft landscaping. As mentioned elsewhere,

there is a condition requiring a revision of the balance between hard and soft landscaping, subject to increasing the soft landscaping on the site, it is considered that on #balance this would be acceptable.

#### *Courtyards / Rear Gardens*

- 14.14 Each of the plots 3, 4 and 5 have, by reason of their enclosed block designs, resulted in internal courtyards. Plots 1, 6, 7, and 8 each of areas to the rear of them, are set aside for landscaping. These areas are generally covered within the submitted Design Code has provided. As mentioned previously, these elements cannot be considered under the full application, as the internal layouts of each of these blocks have not been resolved.
- 14.15 Each of the courtyards have a garden typology that is highlighted within the Design Code. Each of the courtyard plots again appear to have an imbalance between the hard and soft landscaping, with hard landscaping be overly dominant. Furthermore, there is concern with regard to the type of soft landscaping that has been proposed; whilst the idea of productive beds / allotments for communal use is supported, there is no management plan in place to ensure the success of these. Accordingly, the LPA cannot be satisfied that this form of soft landscaping would be the most appropriate, or that it would be managed in a manner that ensures its ongoing success.
- 14.16 A number of the Plots have a rear garden element, between the rear elevations and the site boundary. Each of these present their own issues in relation to providing landscaping. A common theme across the site is that the relationship between blocks and the external boundary is relatively tight, which increases the pressure on the soft landscaping that is proposed along these areas. Specific concern along these areas is that a number of proposed trees are not suitable for their respective locations. The Council advocate the 'right tree for the right location', and in this instance a number of tree types would not comply with this aspiration. The Landscape has identified a number of these conflicts across the site. Whilst this is undesirable, it would not warrant a sustainable reason to refuse the scheme. Furthermore, an appropriately worded condition can be imposed, which would allow the applicant to review the species and locations of some of the trees. Accordingly, such a condition has been recommended.
- 14.17 It is apparent that the landscaping as proposed does not strike the right balanced between hard and soft landscaping across the entire site in its current form, and accordingly this element of the scheme is unable to be supported. However, it is noted that a number of the issues identified as being unacceptable, are not necessarily fatal to the application. Indeed, the applicant has already commenced a review of the balance between the hard and soft landscaping of the entire site, in an attempt to strike a better balance. Accordingly, a condition is able to be imposed to require this to be demonstrated by way of a revised site wide landscape plan. Again, through the use of conditions, the concerns regarding poor species choices and locations, are able to be resolved. Accordingly, such conditions are recommended, and subject to these, the landscaping would be considered acceptable.

### *Sustainable Urban Drainage*

- 14.18 The proposed landscaping scheme has incorporated and detailed where Sustainable Urban Drainage (SUDs) would be located across the entire site. It is noted that this would make up some of the full planning permission and also within the Outline Element (Both Phase 2 and 3). Technical data has been submitted in relation to the functioning of the SUDs across the site, which is discussed elsewhere in the site. Across the site, it is proposed to utilise swales, rain gardens and bio-retention beds, along with porous surfacing. This would support the soft landscaping on the site also. It is considered that the locations of the SUDs across the site is appropriate, and would provide a useful contribution to flood risk mitigation, re-use of rainwater, and ecological improvements.

### *Lighting Strategy*

- 14.19 The landscaping would be supplemented by a site wide lighting strategy. At this stage, this is only set as high level detail, with a comprehensive lighting document to be submitted under any forthcoming Reserve Matters application. However, it is noted that the lighting strategy would need to be developed in line with Council requirements, specifically in relation to where the lighting would be associated with the internal highways that are intended to be passed over for adoption. Furthermore, lighting would need to be developed in consultation with the MET Police (Secure by Design) to ensure that the development would not give rise to secure by design issues / fear of crime.

### *Management Strategy*

- 14.20 The proposed development would result in the loss of Open Space across the site. However, the LPA recognised early in pre-application discussions that the existing quality of the open space was very poor, and in reality any comprehensive regeneration scheme would inevitably result in the loss of some of the open space across the site. whilst discussions regarding Open Space quantum / quality is discussed elsewhere within this report, it is intrinsically linked to the hard & soft landscaping of the site. In accepting any loss of open space below what is existing, the LPA made it clear that this would hinge on it being satisfied that the remaining open space was of a high quality, and would be retained as such for the future occupiers and visitors of the development. In order to for this to be achieved, a Site Wide Management Strategy / Plan would be required to ensure that the public realm would be managed in such a way to ensure its future success.
- 14.21 As detailed above, there are a number of matters in relation to the public realm / hard and soft landscaping that are required to be addressed, and which can be done via a planning condition the full planning element (inclusive of landscaping). However, and notwithstanding any amendments to the site wide hard and soft landscaping or the development, the on-going management of this must be secured to ensure its on-going success as high quality public realm etc. Accordingly, it is considered appropriate that a Site Wide Management Strategy / Plan is secured by way of a condition and within a shadow S.106 obligation.

### Conclusion:

Subject to the conditions and obligations mentioned above, it is considered that the external appearance and design of the buildings together with the proposed landscaping scheme are consistent with the principles of good design as required by the National Planning Policy Framework (2012). The resultant development would be appropriate in its context and would comply with policies 7.4B and 7.6B of The London Plan (2016), Core Policy CS1(B) of the Harrow Core Strategy, policy DM1 of the Council's Development Management Policies Local Plan, which require a high standard of design and layout in all development proposals.

### *OUTLINE PERMISSION*

- 14.22 The proposed development is submitted as a hybrid planning application, with the Phase 1 above under full planning permission, and Phases 2 and 3 coming forward as an Outline Permission. As a result, Phases 2 and 3 are not provided with comprehensive details of the specific layout of the site. However, the parameter plans proposed do set out access routes, land use, landscaping and maximum building envelopes of the site.
- 14.23 From this plans, the layout of the site can be envisaged, whereby a central vehicular route running south off Shaftsbury Avenue enters the site along the eastern boundary, before turning westward to link the development with Dudley Road. This road will form the main vehicular entrance through the site, but would be supported by two other link roads to the north and south of it. An enlarged pedestrian only entrance would be provided off Northolt Road on the south eastern corner, with another one on the southern boundary linking into Waitrose Car park. Set within the land between the proposed highway network through the site would be the land available to erect further buildings upon. The plots within the two phases of the outline permission are listed as Plots 1, 3, 4, 5, 6, 7, 8 and 9. The parameter plans would fix the land uses of the plots, with all but Plot 9 being utilised as residential. Plot 9 is set aside to provide for a community facility, which is to replace the existing community centre located on the site. Finally, all plots would have fixed building heights across the entire site. Through the proposed parameter plans, it is able to draw a conclusion that that the development would have a logical layout and spacing of buildings across the site.
- 14.24 Whilst Phases 2 and 3 comes forward as an Outline Permission, not all matters have been reserved. The access for the entire development site has been brought forward for full consideration. This element is considered acceptable.

### *Design Code*

- 14.25 In support of the outline element of the development, a Design Code has been submitted to assist in the development of Phases 1 and 2. The Design Code sets out the fundamental parameters for the outline elements of the masterplan, which would assist in ensuring the delivery of a coherent, high quality and

successful residential neighbourhood. Or also provides a framework which allows for architectural diversity and where landscape and public realm is fully integrated with the buildings and surrounding area.

- 14.26 The proposed scheme involves the comprehensive development of the Grange Farm Estate, with the design rationale to ensure that it 'stitches' into the existing urban fabric. As a result, the development must work very hard to tie in with the traditional Metroland character which is located to the north and west of the scheme, and then the more densely urban character along Northolt Road to the east. The Design Code set three distinct characters across the site, being Metroland to the north/west of the site, before changing to a medium scale buildings identified as courtyard blocks. Finally, and along the southern and eastern boundary, are larger scale blocks known as Mansion blocks, which are more akin to the urban fabric adjoining this part of the site. Across the site, the Design Code has identified expressive corners to buildings, which provide an opportunity for architectural licence to achieve details of interest where they would be prominent within the public realm.
- 14.27 As mentioned above, the proposed parameter plans detail land uses across the site, with the majority of this being set out for residential development. All but Plot 9 (Block S) would be residential, with Plot 9 being for community use. The parameter plans provide an indicative tenure arrangement across the site, which demonstrates the differing tenures could be physically accommodated within the site and managed appropriately.
- 14.28 The Design Code and the parameter plans contained within, provide detailed building heights for the entire Outline Element. The indicative plans submitted, indicate that the proposed scale of the development would be able to provide the quantum of housing required for the scheme to be delivered. However, it must also set heights to ensure that the scheme would provide an appropriate development in terms of the its character and impacts on residential amenity. Critically for this scheme, maximum heights are important to be achieved and complied with, as there are further implication in relation to the safety zones as set by the Ministry of Defence by reason of the proximity of the site to RAF Northolt Airport.

Block	Block Type	No. of floors	Maximum Roof Height (AOD)
Block A	Metroland	4	84.82
Block B	Metroland	3 & 2	78.35
Block F	Courtyard	7	91.74
Block G	Courtyard	6	93.70
Block H	Courtyard	5	87.87
Block I	Courtyard	6	89.29
Block J	Courtyard	6	89.79
Block K	Courtyard	4	81.58
Block L	Courtyard	4	81.58
Block M	Courtyard	5	84.09
Block N	Courtyard	6	86.49
Block O	Mansion	6	85.74

Block P	Mansion	6	85.52
Block Q	Mansion	7	89.40
Block R	Mansion	7	88.50
Block S	Community Centre	2	85.10

- 14.29 The above table sets maximum heights for the buildings to come forward under the outline element. However, to ensure that buildings do not come forward under a Reserved Matters Application with roof forms set at the maximum heights as listed above, the Design Code provides guidance on how roof forms should be articulated across each of the typologies. This is important to ensure that the character of the development satisfactorily articulates the surrounding domestic vernacular language, and also to ensure that the perceived bulk and massing of the much larger scale development is mitigated. Roof scape is critical to achieving a good design, as this is the most visible part of a development, and as such the Design Code also identifies other important features that should be included in roof space design going forward into a reserved matters application.
- 14.30 Along with the building heights set within the parameter plans, the Design Code also details building separation distances (particularly in relation to the distance between buildings within the development site). The distance proposed as shown are considered to be appropriate, specifically in terms of ensuring satisfactory space to provide a development that would not appear cramped and overbearing for future occupiers.

### Materials

- 14.31 The Design Code places great emphasis on the materials sought to be used throughout the Outline Element, as this is critical to ensuring that a high quality development is achieved on the site. The development would primarily be constructed of brick, which is appropriate for the local context of the application site, wider area, and Borough as a whole. Whilst not being overly prescriptive which may result in stifling the delivery of the development, the Design Code provides a number of high quality brick type examples. It goes onto detail the mortar also, which is important in terms of its overall appearance and also assisting in providing a variation across the scheme (in terms of its application).
- 14.32 Along with the brick and mortar details within the Design Code, other facing materials such as roof tiles, standing seam metal (roofing), living roofs, windows frames and doors, gutter and rainwater goods detail, and balcony details are also provided. Again, these are required to be of high quality, both within their own right, and also in relation to how they would appear in conjunction with the remainder of the materials within the outline element.
- 14.33 Along with the choice of materials to be used within the development, the Design Code gives direction on expressive features across the site. This includes providing detailed examples of how service doors should appear, communal area finishes, and how private/communal entrances should be designed and finished. The specific guidance on these elements ensure that a



high quality is provided, and the space in which people utilise often is a pleasant place to be, with ancillary elements (service doors) not a detraction from the overall design rationale and expectations.

- 14.34 It is important to note that the materials and products published within the Design Code are an aesthetic benchmark to generate a sample material palette of colours and textures across the masterplan. The Local Planning Authority acknowledge that these examples may not practically or financially be able to be slavishly applied to the scheme, but would expect a similar quality of material to be utilised. Any Reserved Matters application would have to demonstrate a high quality material to be used across the scheme.

#### Residential Typologies

- 14.35 Going beyond the above general guidance for Outline Element for the comprehensive development, the Design Code provides more detailed advice on how each of the three separate character areas of the development should come forward. Each of the character areas have specific attributes that are central to their respective design rationale, and as such must be picked up and brought forward under a Reserved Matters Application, whilst ensuring the overall site wide design rationale is not lost. The Design Code ensures that specific features are picked up throughout each of the character areas, whilst still allowing a certain amount of flexibility on how each are delivered.
- 14.36 The Outline Plan, by its very nature, does not provide full details of this element of the scheme, in terms of determining residential amenity of future occupiers. However, the Design Code has provided indicative floor layouts of each the three character area typologies. Each of the floor plans provided for the three typologies demonstrate that the Outline Element could reasonably provide for a functional layout for future occupiers compliant with London plan (2016) space standards. Again, any Reserve Matters application would have to provide further detail on impacts on future occupiers.
- 14.37 The Design Code is considered to be a successful document in ensuring that each of the three character areas have a set of guiding principles as to how they will be brought forward, whilst still ensuring that the overall design rationale for the development is respected. It goes onto ensure that a high quality of material is utilised within the scheme, and important architectural period features are picked up across the development. However, it provides a document that is not overly prescriptive, allowing for flexibility in its delivery, whilst ensuring that the high quality is retained.

#### Community Centre

- 14.38 The existing site has a small community centre on site, which is proposed to be replaced with a larger, more modern and more functional and useable facility. Historically, Grange Farm was an operational farming unit, with a barn at the centre of it. The barn that was located on site was also used as a meeting place for public gathering and speeches etc to be held. It is based on this that the proposed replacement community centre has evolved in terms of its design and

use. Furthermore, comprehensive consultation with the Grange Farm Estate residents have provided the applicant with a 'wish list' of functions that the replacement facility should provide. The applicant has taken this forward, and the Design Code provides guidance on how this hard working building should come forward.

- 14.39 The Design Code provides guidance on both how the Community Centre should perform in terms of its uses, and also its design and appearance. The Community Centre would be located on Plot 9 (Block S), and has its appearance based on the historic barn that was located on site. As mentioned previously, the Community Facility would have to perform a number of functions, which results in the building having to work hard to successfully achieve these uses. Furthermore, the multiple uses within the building, in conjunction with this prominent location (at the eastern end of the village green) would place extra pressure on its design by reason of having four prominent elevations.
- 14.40 The Design Code provides a breakdown of the uses that the Community Centre must provide within its demise. The Design Code sets a minimum amount of floorspace, which is then divided up into the space required to meet the demands within it. Any Reserve Matters application coming forward would have to demonstrate that these uses would be accommodated in line with the Community Centre.
- 14.41 In terms of the actual design of the Community Centre, as mentioned previously, its design rationale comes from the former barn that occupied the site (image within the Design Code). The Design Code provides details on how the design should be progressed, which is to follow the barn like features, resulting in a standalone building with a steeply pitched roof. Hard wearing materials of a more rural flavour should be utilised within the finishing of this structure, to ensure that it appears as a much different use the remainder of the site, whilst providing a nod to the historic use of the site. Lastly, the Design Code provides detail/examples in terms of high quality materials to be utilised within the finish of the building. Whilst not overly prescriptive in terms of the actual materials, the Design Code expects high quality materials to be brought forward as part of any Reserve Matters application.

#### Conclusions on Standard of Design and Layout

- 14.42 Accordingly, and subject to consideration of detailed reserved matters applications in conjunction with the approved Design Code, the proposed development is capable of successfully integrating with surrounding areas, whilst creating a unique character of its own. The scheme would reinforce the positive aspects of local distinctiveness, whilst enabling the promotion of designs that would improve the area and the way it functions, in accordance with the objectives and provisions of the National Planning Policy Framework, policies 7.4.B and 7.6.B of The London Plan 2016, policy CS1.B of the Harrow Core Strategy 2012 and policies DM1 and DM2 of the Harrow Development Management Policies Local Plan 2013.

## 15.0 Landscaping

- 15.1 Grange Farm Estate as it currently exists is identified within the Local Plan as being Open Space. Core strategy conflict insofar as it promotes the regeneration of this site, but would not support any loss of open space. The proposal would result in a loss of Open space, which is resisted within local policy. As mentioned previously, the existing development benefits from 14,829sqm of open space, which is predominantly (14,444sqm) grassland, with 385sqm of play space. The proposed replacement of open space would result in 12,285sqm across the site, whereby a reduction of 2,159sqm of open space.
- 15.2 The proposed Outline Application reserves matters in relation to appearance, means of access, layout and scale (although indicative plans are submitted in relation to the Outline Application). However, full details have been submitted in relation to the Landscaping of the entire redevelopment site. It is noted that the landscaping areas that are to be private amenity space, and not open for the public as communal landscaping areas, have been detailed as not for consideration Outline Application. The Design Code submitted as part of the application details each of these areas. Notwithstanding the above, given that the application does not reserve the landscaping matters, it is not possible to split the different elements (public/private) out of the assessment. Therefore, all landscaping must be considered, that which is within the full planning drawings and that which is detailed within the Design Code.
- 15.3 As mentioned previously, the existing site is designated as Local Open Space within the Local Planning Policies. The proposed development as it stands would result in a net loss of Open Space across the site, which is not encouraged by the current policy framework. Early pre-application discussions made it clear that in order the Local Planning Authority to support any loss of Open Space from the site, the submitted information must clearly demonstrate that the remaining open Space is of a high quality and to be successful in terms of use by future occupiers.
- 15.4 The landscape provision, in terms of its quantum and quality has been discussed elsewhere within the report, and as such need not be replicated here.

### *Trees and development*

- 15.5 London Plan Policy 7.21 *Trees and Woodland* states that existing trees of value should be retained and that, wherever appropriate, additional trees should be planted in new development. Local Plan Policy DM22 *Trees and Landscaping* requires development proposals to include hard and soft landscaping and calls for retained trees to be protected during construction.
- 15.6 The application site, apart from being predominantly an open grassy area, does have a number of trees on site, some of which hold a high amenity value. The applicant is commended that during the progression of the scheme, as many trees, and specifically those of high amenity value, were attempted to be retained. However, it is noted that where the retention of trees was not possible, there had to be the removal of some high quality trees. It became more difficult

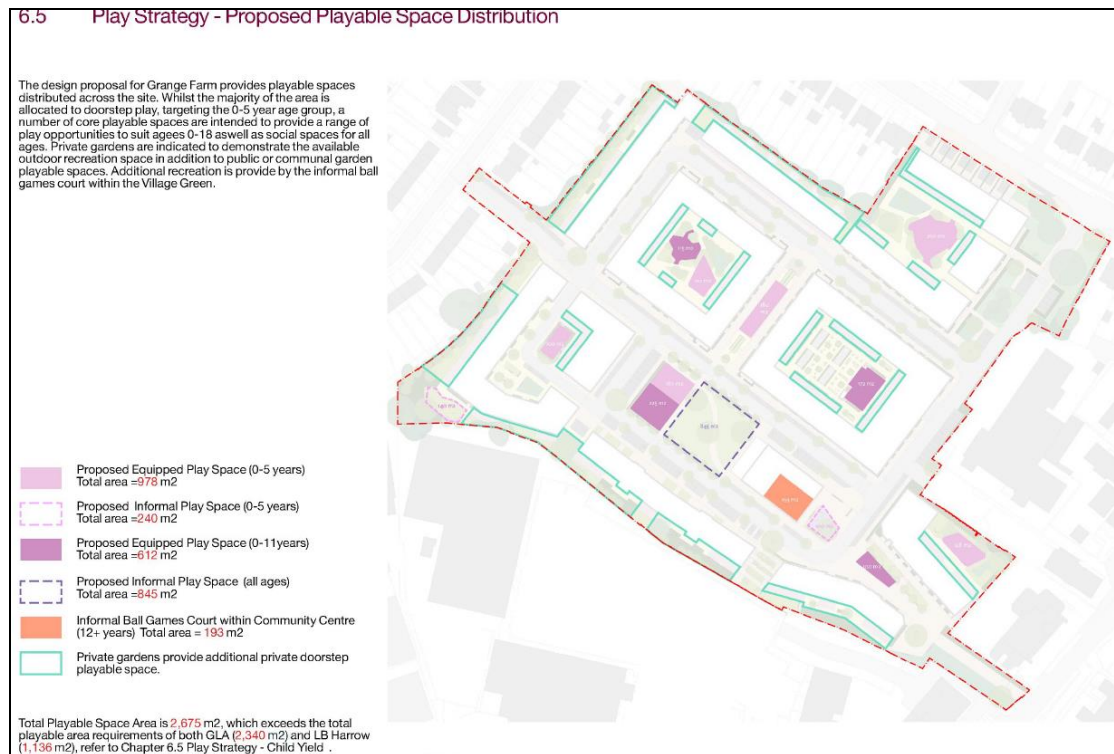
to retain trees across the site, especially given numerous constraints that were in place when trying to provide a deliverable scheme. The current application provides a layout that ensures a number of well-established trees adjacent to the entrance from Shaftesbury Avenue would be retained. Three of these trees were identified as Category A trees as part of the site survey.

- 15.7 The proposed development has provided a comprehensive landscape plan as part of the application, which provides a tree retention / replacement plan for the development. In terms of the replacement trees within the development, these have been planted across the site in line with the types of 'garden' areas identified across the site. This is primarily in relation to the internal (private) communal areas.
- 15.8 Located within the (public) communal open space areas, the landscaping strategy provides for a range of different types of trees. The larger expanse of open space provides the opportunity for larger 'landmark' trees.
- 15.9 Details in relation to the trees and landscaping is detailed above.

#### *Play space*

- 15.10 Local Plan Policy DM28 Children and Young People's Play Facilities requires major residential development to provide sufficient play space on-site to meet the needs of the development. Applying the child yields at Appendix 1 of the SPD, it is calculated that the development would yield a total of 153 0 – 4 years old, and 131 other age group. Harrow require 4sqm per child, therefore based on the above a total of 1,136sqm is required to be provided. It is noted that GLA policy determines that child yield for the site would be 120 0 – 5 year olds and 114 other ages groups. This would therefore require a total play space of 2,340sqm. The proposed development provide a total of 2,675sqm of dedicated play space across the site, which is a vast improvement on the existing quantum of 385sqm, and exceeds both the quantum's required by the GLA and Harrow Council.
- 15.11 The Play Strategy (incorporated within the submitted Design & Access Statement) indicates that a total of 2,675sqm will be provided as play space across the site. Not only is there a significant increase in the quantum of dedicated play space across the site, but the quality of that provided is much better than existing. Currently, there is a single dedicated play space for the entire site, which is not overly inclusive to all ranges of the children that would be present on the site. The proposed play space would provide a range of formal and informal play space across the site, which enables easier access to each of the different typologies for the occupiers of the site. Specifically, it is noted that the Village Green would provide a MUGA, formal play space and also informal space. This area is located centrally within the site, and as such would be the most accessible location to the remainder of the site. The following image provides detail as to how the play space would be arranged across the site.
- 15.12 The design and access statement provides examples of different forms of

formal play, however, further details of these would be required to be submitted through a reserve matters scheme when these phases come forward.



15.13 As discussed previously regarding the open space provided onsite, each of these areas (both private and public) would benefit from overlooking / passive surveillance. It is noted that a number of the private amenity / play spaces located within the blocks and / or to the rear of blocks, would not receive a high quantum of daylight / sunlight. However, the communal (public) open space and play space is located in areas across the site that benefit from much more access to daylight / sunlight. Given that the substantial play space is provided on the communal (public) open space across the site, it is considered that this would ensure a satisfactory arrangement and offer of play space across the site.

15.14 It is therefore considered that subject to safeguarding conditions the development would accord with National Planning Policy, and relevant London Plan and Local Plan policies.

## 16.0 Flood Risk and Development

16.1 The site is within Flood Zone 1, meaning that the site is assessed as having a less than 1 in 1,000 annual probability of fluvial flooding from main rivers and, in accordance with the NPPF, sequential and exception testing of the proposed development is not required. Part of the site, located within the south eastern

corner of the site has a 'High' susceptibility to surface water flooding, and is defined as having a greater than 1 in 30 (3.3%) Annual Probability of flooding. However, the Local Plan designated the site as within a critical drainage area meaning that it is susceptible to flooding from surface water.

- 16.2 The NPPF states that a site-specific flood risk assessment (FRA) is required for proposals of 1 hectare or greater in Flood Zone 1. The application site area is more than 1 hectare.
- 16.3 Paragraph 103 of the NPPF states that, when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere. London Plan Policy 5.12 *Flood Risk Management* states that development proposals must have regard to measures proposed in Catchment Flood Management Plans. It is noted that the EA's Thames Catchment Flood Management Plan (2009) focuses on the adaptation of the urban environment to increase resistance and resilience to flood water, and that this objective informed the preparation of Harrow's Local Plan policies on flood risk management.
- 16.4 Core Strategy Policy CS1 U undertakes to manage development to achieve an overall reduction in flood risk and increased resilience to flood events. Local Plan Policy DM 9 *Managing Flood Risk* and DM10 *(On Site Water Management and Surface Water Attenuation)* calls for major development to: reduce surface water run-off; utilise sustainable drainage systems; ensure adequate arrangements for management and maintenance of on-site infrastructure; use appropriate measures to prevent water pollution; and where appropriate, demonstrate that the proposal would be resistant and resilient to flooding from all sources.

*Reduce surface water run-off*

- 16.5 London Plan Policy 5.13 *Sustainable Drainage* states that development should aim to achieve greenfield run-off rates and this objective is reiterated in Local Plan Policy DM9 and DM10.
- 16.6 A proposed surface water management strategy sets out various SuDS techniques which will be incorporated through the process of a detailed design in order to enhance the quality, amenity and biodiversity value of the development, whilst reducing water quantity discharging from the site during peak rainfall events. The submitted information identifies that the proposed peak discharge rate for the site is 19.5l/s.

*Utilise sustainable drainage systems*

- 16.7 Both the London Plan and Harrow's Core Strategy seek to achieve greenfield rainwater run-off rates from new development through the integration and deployment of sustainable urban drainage systems. The objective is to help restore a more natural response to rainfall within river catchments, and to address/prevent localised surface water flooding.

16.8 London Plan Policy 5.13 sets out a hierarchy of sustainable drainage measures, with the aim of managing surface water run-off as close to source as possible. Policy 5.11 *Green Roofs and Development Site Environs* calls for major developments to incorporate green roofs where feasible and Policy 5.15 *Water Use and Supplies* identifies rainwater harvesting as one of the methods that can help to conserve potable water. The applicant's surface water drainage strategy sets out the approach proposed and this is appraised in relation to the London Plan hierarchy as follows:

- *Store rainwater for re-use*: The applicant's Design & Access Statement makes reference to rainwater harvesting in individual water butts for use by some residents. No further details are available in the FRA.
- *Use infiltration techniques*: The FRA utilises block paving in several locations. Site levels are designed to encourage runoff to drain through soft landscaping features such as rain gardens and tree pits.
- *Attenuate rainwater in ponds or open water features for gradual release*: The FRA notes that the site does not provide for such features. However, some external areas are design to flood in exceedance events, providing additional protection to the sewer network.
- *Discharge rainwater direct to a watercourse*: The FRA notes that there is no watercourse in reasonable proximity to the site, and this is accepted.
- *Discharge rainwater to a surface water drain*: Surface water will discharge to the TWUL sewer at a controlled rate.
- *Discharge rainwater to the combined sewer*: n/a

16.9 The Council's drainage team has expressed satisfaction with the sustainable drainage strategy, as set out in the applicant's FRA, but has advised that it is necessary to secure detailed drainage proposals as a condition of any planning permission. It is considered that such a condition should include details of the proposed green roofs and specify a requirement to investigate and, if feasible, set out details for rainwater harvesting, to ensure that opportunities to manage surface water at the upper end of the hierarchy are exploited wherever possible.

*Ensure adequate management and maintenance arrangements*

16.10 Details of the proposed arrangements for the future management and maintenance of the drainage systems has been submitted with the application. As noted above, the Council's drainage team has expressed satisfaction with the applicant's sustainable drainage strategy but has advised that it is necessary to secure a management and maintenance plan as a condition of any planning permission.

*Prevent water pollution*

16.11 The applicant's surface water drainage strategy states that appropriate control measures must be included in the surface water drainage system to minimise the risk of contamination or pollution entering the receiving systems from surface water runoff. Furthermore, where appropriate surface water runoff

would be designed to drain to soft landscaping and porous paving, prior to be attenuated in the below ground attenuation tanks. The drainage system should be designed to comply with the requirements of the SuDS treatment train as laid out in CIRIA 697 'The SuDS Manual'.

*Where appropriate, demonstrate resistance and resilience to all sources flooding*

- 16.12 The applicant's FRA confirms that the probability of fluvial and groundwater flooding is negligible. The aforementioned measures, subject to details that may be secured through planning conditions, are considered to satisfactorily address the risk of surface water flooding.
- 16.13 Subject to safeguarding conditions the development would accord with National Planning Policy, The London Plan policy 5.12.B/C/D, and policy DM10 of the DMP.

## **17 Carbon Dioxide Emissions Reduction**

- 17.1 The NPPF requires new development to comply with adopted local policies on decentralised energy supply and to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 17.2 London Plan Policy 5.2 *Minimising Carbon Dioxide Emissions* applies the following hierarchy for the reduction of carbon dioxide emissions from new development: use less energy; supply energy more efficiently; and use renewable energy. The policy goes on to set out carbon dioxide reduction targets for residential and non-residential development, and requires detailed energy assessments to be submitted with applications for major development.
- 17.3 The application has submitted an energy statement, which provides detail on both the full planning application element (Phase 1), and the Outline planning permission for Phases 2 and 3, comprising 485 dwellings and a community centre. For Phase 1, for which full planning permission is sought, detailed calculations prepared in accordance with the GLA's guidance are presented. For Phases 2 and 3, for which outline planning permission is sought, the calculations for the dwellings are based on the Phase 1 calculations, with emissions rates applied on pro-rata basis.

### *CO2 Reduction Target*

- 17.4 The London Plan carbon dioxide reduction target for residential and non-domestic buildings during the period 2013-2016 is to achieve a 40% improvement on the 2010 Building Regulations. The applicant's energy strategy notes that this is equivalent to a 35% improvement upon the requirements of the 2013 Building Regulations.
- 17.5 The Energy Strategy details a range of methods, relative to the London Plan energy hierarchy, that would achieve a combined improvement of **35%** upon the requirements of the 2013 Building Regulations, as set out below.



*use less energy (lean measures)*

- 17.6 The Energy Strategy attributes CO2 savings of **1.7%** from measures that would reduce energy demand on the site. The CO2 reduction would be achieved from: measures that would improve the insulation/air tightness of the buildings; the shading provided by the proposed balconies and other building design features; features that aid natural ventilation such as trickle vents to window units and dual aspect to many flats; use of energy efficient mechanical ventilation; and not installing mechanical cooling (i.e. air conditioning) to residential premises.

*supply energy more efficiently (clean measures)*

- 17.7 The Energy Strategy attributes CO2 savings of **28.9%** from the installation of a site-wide Combined Heat and Power (CHP) network. The CHP network would provide heating and hot water to the site, and would generate electricity for the non-residential areas within the development.

*use renewable energy (green measures)*

- 17.8 The Energy Strategy attributes CO2 savings of **7.0%** from the use of renewable energy. Specifically, photovoltaic (PV) panels are proposed on the roofs that would make a contribution to site's the electricity supply.

## **18.0 Sustainable Design and Construction**

- 1.1 As noted above, the NPPF requires new development to comply with adopted local policies on decentralised energy supply and to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption. London Plan Policy 5.3 *Sustainable Design and Construction* requires development proposals to meet the minimum standards outlined in the Mayor's SPG<sup>6</sup> and sets out the principles for sustainable design and construction. Local Plan Policy DM12 *Sustainable Design and Layout* sets out Harrow's local requirements and these are incorporated into the appraisal below.

*Minimising carbon dioxide emissions across the site*

- 1.2 As noted above, the proposal would achieve the London Plan's targets for CO2 emissions reductions achieved by improvements to the efficiency of the proposed buildings, sustainable ventilation/cooling systems and more efficient/cleaner energy supply systems.

*Avoiding internal overheating and the urban heat island effect*

- 1.3 London Plan Policy 5.9 *Overheating and Cooling* provides further detail on this point, requiring development proposals to follow a cooling hierarchy (to avoid overheating and reliance on air conditioning systems) and requiring major

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<sup>6</sup> *Sustainable Design and Construction* supplementary planning guidance (2014).

development to demonstrate how the proposal would minimise overheating and meet its cooling needs. The importance of passive measures and insulating building materials are emphasised in Local Plan Policy DM12 and the Mayor's SPG.

- 1.4 The submitted energy statement notes that in order to achieve the above, sample modelling has been undertaken though the specific SAP test. Each of the sample dwellings complied with the SAP test carried out. However, the regulations explicitly recognise that, as the test does not cover all factors influencing overheating, it provides no guarantee that buildings will not overheat. Therefore, for 'free running' buildings, i.e. those without mechanical cooling, it is generally appropriate to undertake dynamic thermal modelling to assess occupant thermal comfort. Early in design development, dynamic thermal modelling was used to test compliance with good practice recommendations and showed a high level of compliance.

*Minimising pollution*

- 1.5 It is not considered that the proposed uses pose a significant threat of future land contamination.
- 1.6 Air quality and noise issues are dealt with in separate sections of this report and, subject to necessary mitigations that can be secured as conditions of any planning permission, are considered to be acceptable.

*Minimising waste and maximising reuse/recycling*

- 1.7 The proposed waste and recycling arrangements are dealt with in a separate section of this report. It is considered that the design and layout of the proposal would ensure that future occupiers of the development contribute to the Borough's good record in managing down the amount of waste sent to landfill and improving rates of recycling. As noted elsewhere in this report, a site waste management plan could allow for the efficient handling of construction, excavation and demolition waste from the site.

*Avoiding impacts from natural hazards*

- 1.8 The only identified natural hazard relevant to the site is that of surface water flooding. The issue is dealt with in a separate section of this report and, with mitigation, is found to be acceptable.

*Comfort and security of future occupiers*

- 1.9 As set out elsewhere in this report, the proposal would meet minimum space standards (and a functionable layout) and contribute to the creation of a Lifetime Neighbourhood, including the Secured by Design principles. Controls to mitigate internal overheating are described above. It is considered that the development would offer a good level of comfort and security to future occupiers.

*Biodiversity and green infrastructure*

- 1.10 As set out elsewhere in this report, the existing site is considered to be of very limited ecological value, so its redevelopment would not be detrimental to biodiversity. Furthermore, the proposal offers the potential to enhance biodiversity both through the provision of on-site landscaping and other features.
- 1.11 London Plan Policies 5.10 *Urban Greening* and 5.11 *Green Roofs and Development Site Environs* call for the provision of green infrastructure on site, including planting, green roofs and green walls. As set out elsewhere in this report, the proposal does make provision for a range of forms of green infrastructure across the site, which can be secured as part of the hard and soft landscaping details required as a condition of any planning permission.

## **19.0 Decentralised and Renewable Energy**

### *Decentralised Energy*

- 19.1 London Plan Policy 5.6 *Decentralised Energy in Development Proposals* applies a hierarchy to the selection of appropriate energy systems for major development proposals and calls for opportunities to extend decentralised energy systems beyond the site boundary to adjacent sites to be examined. It also states that, where future network opportunities are identified, proposals should be designed to connect to these networks.
- 19.2 Harrow's Core Strategy includes a commitment to explore the feasibility of a district-wide decentralised energy network for the Harrow & Wealdstone opportunity area, and Policy CS2 K requires new development to make provision for future connection to the network. Local Plan Policy DM13 *Decentralised Energy Systems* supports proposals for decentralised networks.

### *District-wide network*

- 19.3 Pursuant to the commitment contained within the Core Strategy, the Council has commissioned Arup to prepare an energy masterplan for Harrow and this will include investigation of the feasibility of a decentralised energy network within the opportunity area. The potential for a district head network (i.e. extending beyond the site boundary) centred on Grange Farm was identified. However, there is currently no proposal to bring this forward. The submitted Energy Statement notes that connection to any existing or proposed heating or cooling network is not feasible.

### *Proposed site-wide decentralised energy network*

- 19.4 Details of the proposed site-wide decentralised energy network and how it came to be selected are set out in the applicant's Energy Strategy. The system would take the form of a combined heat and power network, which would be located within Phase 2 of the development. Initially, a site wide heat network would serve Phase 1 initially, and would then be extended to serve subsequent Phases. An energy centre, accommodating the heat generating plant and

thermal storage, network within the Phase 2 curtilage and therefore it is proposed to install gas-fired boilers as the temporary heat source for Phase 1.

- 19.5 The applicant's Energy Strategy considers and discounts the use wind turbines, heat pumps and biomass fuel. A gas fired system is therefore proposed. The necessary plant would be accommodated within an energy centre located at basement level and the flues would extend through building F to roof level.

*Potential to serve adjacent sites*

- 19.6 Grange Farm is located within South Harrow, and there are no known allocated sites within close proximity to the site, which have been identified to come forward for future development. Given this, it is considered that specific details at this stage need not be required to adjoin to adjacent sites. However, it is noted that there is a relatively clear line of site from the south-western end of Block F, directly north to the access with Shaftesbury Avenue. Accordingly, this would provide a feasible avenue to connect outside of the application site.

*Potential to connect to a future district-wide network*

- 19.7 It is assumed that any future district-wide network would serve this most central part of Harrow town centre for feasible operation, there is no certainty at this point in time as to the viability, design and timetable for installation of such a network. Given that the application site is some distance from the town centre, it is therefore unlikely that there is an opportunity at this stage to connect to the future district-wide network.

## **20.0 Ecology and Biodiversity**

- 20.1 By inference, the NPPF emphasises that one of the best ways to conserve the natural environment is to encourage the effective use of land by re-using previously-developed land to meet development needs. At paragraph 118 the NPPF sets out the principles for conserving and enhancing biodiversity, which include resisting development that would: (i) cause significant harm that cannot be avoided, mitigated or compensated-for; or (ii) have an adverse affect on a Site of Special Scientific Interest (SSSI). Opportunities to incorporate biodiversity in and around developments are encouraged.
- 20.2 London Plan Policy 7.19 *Biodiversity and Access to Nature* echoes the need for development proposals to make a positive contribution to biodiversity, to protect statutory sites, species and habitats, and to help achieve Biodiversity Action Plan targets. Local Plan Policy DM21 *Enhancement of Biodiversity and Access to Nature* requires all development proposals to incorporate features that support the protection, enhancement, creation and management of biodiversity within Harrow.
- 20.3 With regard to the existing site, it is noted that it is designated Open Space within the Local Plan. However, it is noted that the site is comprised mainly of amenity grasses and trees. Some of the existing trees are of a very high quality,

with some to be retained and some to be removed. An Ecological Assessment has been undertaken for the site, which concludes that the existing site supported very little habitat was considered of value to wildlife. Scattered existing trees provided potential breeding and foraging cover for common birds, although no old or in-use nests were found at the time of the visit, and the trees did not support suitable features for roosting bats.

- 20.4 As mentioned previously, the submitted scheme proposes full details in relation to hard and soft landscaping. By reason of this, there is an opportunity to significantly improve the biodiversity offer of the site, and wider area. Notwithstanding the improvements able to be brought forward by way of the comprehensive landscaping scheme, biodiversity improvements are also provided by way of incorporating specific design elements into the overall design fabric of the development.
- 20.5 Included in the supporting information submitted with the application a Biodiversity / Ecology Reports in June 2015. A further site inspection and addendum to the original documentation was undertaken on the 14<sup>th</sup> September 2017.
- There was one statutory site within a 2.0 km radius of the survey area; Grove Farm Local Nature Reserve (LNR) 1.4 km south of the site and 18 non-statutory sites. The latter were either Sites of Borough Importance (borough I and borough II) or Sites of Local Importance. The closest of these were Orley Farm School Nature Conservation Area Site of Local Importance 800 metres to the southeast and St Dominic's Sixth Form College Grounds Borough Grade II 810 metres southeast. None of these species or habitats were considered likely to be affected by the proposed works.
  - the habitats on/surrounding the site are considered to generally be of low ecological value;
  - No rare vascular plants were found, and all species recorded were common and widespread. There were no invasive or notifiable species.
  - A total of 3 species of birds were observed. These were all Species of Low Conservation Concern (RSPB Green list). These birds could potentially nest in the trees across the site.
  - None of the trees supported features such as decay cavities, woodpecker holes, fissures and exfoliating bark, that would be considered suitable for bat roosting and/or hibernation.
  - A daytime bat inspection of the exteriors of the buildings revealed no evidence of bat activity or occupation, and the likelihood of roosting bats being present was considered to be negligible. Indeed, although the roof voids were not inspected, they were thought to be inaccessible to bats, as there were no suitable external crevices or cavities.
  - The land had low potential for reptiles and amphibians, as there were no permanent water or wetland features, no suitable refugia or hibernacula, and very limited foraging opportunities.
  - There were no signs of Badger *Meles meles*, however a Fox *Vulpes vulpes* earth was discovered in March 2016 at the rear gardens of the properties off Wesley Close.

### *Ecology and biodiversity protection measures*

- 20.6 The Assessment reports that the site is generally of low ecological value, and as such the proposed development is not likely to have a notable impact on wildlife. However, the assessment does go on to recommend the following;
- A pre-works inspection of all roof voids in the Community Centre, these to be conducted by a suitably qualified bat ecologist to ensure no bats are present before works commence;
  - Supervision of the roof tile removal of the Community Centre;
  - In the unlikely event that a bat, or evidence of bats, is found at any other time during the demolition works on site, all work will stop immediately and the advice of a suitably qualified ecologist will be sought;
  - Contact numbers of a licensed bat ecologist will be held on site.
- 20.7 It is considered that these recommendations may be secured as a condition of any planning permission.
- 20.8 The Assessment recommends that enhancements may be achieved by the use of native and wildlife beneficial soft landscaping. Such landscaping could help to support nesting and foraging opportunities for bird species other than feral pigeon, attract pollinating insects and provide a food source for invertebrate and bird species.
- 20.9 Notwithstanding the above, the Council's Biodiversity Officer has reviewed the submitted Biodiversity and Ecological Assessment for the site, and has made a number of observations regarding it. Firstly, it is noted with regret that at there is a significant loss of green space (not to be confused with open space) across the site, which is in the vicinity of approximately 75%. Notwithstanding the relatively low quality offer to biodiversity and ecology of the existing site, it nonetheless makes a contribution that would be lost by the significant amount of hardstanding across the site. However, it is noted within the supporting information, which the applicant intends to make a number of improvements the biodiversity offer of the site. Further to these, the Council Biodiversity Officer has made the following points:
- All flat roofs should all be covered with species-rich green/blue/brown roofs, to support a variety of pollinating insects and other invertebrates. Green roofs should be down to a meadow or acid grassland species with few grasses rather than being Sedum based. This includes areas where Solar PV installations are proposed, the added advantage being that the microclimate created by a living roof helps solar cell efficiency.
  - Numerous invertebrate shelters, offering a wide range of conditions to support a diversity of species should be created at roof, and ground level and within suitable external building walls at different heights.
  - A mix of bat and bird boxes, to be integrated into building structures and (where appropriate) installed in mature trees should be spread across the site to create a mix of roosting, breeding (and possibly hibernating)

opportunities across the site

- Lighting proposals should be developed with recognition of Biodiversity impacts.
- A large number of existing trees on the site, some large and mature, are due to be removed, amounting to a considerable loss of biodiversity and contribution to ecosystem services in the location within which the site sits.
- Additionally, there are a number of trees presently labelled for retention which will be too close to the new buildings for there to be any realistic change of their being retained to the end of their natural life. The plans and any biodiversity assessment will need to be amended to take account of this.
- Trees that are proposed, ostensibly to provide a green border to neighbouring properties, appear to be out of proportion to the size of the gardens for which they are proposed. Gardens at the west of the site will be largely in shade in both the morning and late afternoon
- Too little space is given to areas for wildlife at present, in relation to what is being lost. It is easy to envisage hedgehogs – one of the UK's fastest declining mammals using the site at present but not once it has been developed.
- Too much space is given over to hard surface and to play areas and the allocation should be re-evaluated. A consequence of the current design is that there small patches of designed habitat which are all too scattered.
- The height of the building will result in the courtyard areas being heavily shaded. Species mixes should be adjusted to take account of this.
- Within green/blue roofs and priority wildlife areas, there should be a preference for sowing/planting native species only, choosing seeds/plants of UK and, ideally, local provenance.
- Ornamental areas may contain a wide range of non-invasive, non-native species and the right composition can provide fruit, pollen, nectar, foliage and shelter opportunities that would not be offered by native plants, often extending the period over which, e.g. pollinators may be supported.

20.10 Following on from the comments detailed above, the applicant has made some positive steps which would assist in overcoming some of the above points, however, it is acknowledged that they are unlikely to overcome all of the matters raised. Firstly, and as discussed elsewhere within the report, there appears to be an overprovision of formal child play space, which generally has come forward as a bonded rubber ground treatment. This form of treatment, whilst still classified as Open Space, does not offer any improvements to the biodiversity / ecology benefits to the site. However, the applicant has sought to remove as much of the over supply of this element of the scheme, whereby reverting these spaces to soft landscaping. These areas are able to still be utilised as play space, but by being set aside as soft landscaping, come with further benefits. Accordingly, the loss of approximately 75% of the green spaces across the site, has now come down considerably.

20.11 The Biodiversity Officer (and the Landscape Architect) have both made comment in the negative in relation to some of the plant species that have been selected within the site, and also in relation to the proposed locations of these. It is acknowledged firstly that the some of the species selected, would result in

very large trees in close proximity to either proposed buildings, or in relation to neighbouring property boundaries. The impact of selecting the wrong trees and / or placing them in areas that are not optimal, this can lead to post development pressures. It is considered that a number of the selected species, and also the location of a number of them must be changed, to ensure their on-going success, an on-going biodiversity / ecological benefit, and without resulting in the potential conflict with future occupiers / buildings.

- 20.12 The submitted Design Code and Design & Access Statement both make mention of incorporating habitat improvements into the fabric of the built environment, and also within the landscaping. The information submitted to date appears satisfactory, however, further detail would be required to ensure that the positioning of these is appropriate.
- 20.13 As noted elsewhere in this report, it is intended that the proposal would also make provision for green roofs to those rooftops not intended as communal rooftop gardens/private terraces. Green roofs bring environmental and ecological benefits and so would represent a further and significant biodiversity enhancement. The areas identified for green roofs would also accommodate photovoltaic (PV) panels. There is no inherent conflict to dual provision of green roofs and pv panel; indeed the two are considered to complement each other since the PV panels provide opportunities for planting of species requiring slightly more shade, whilst the cooling effect of the green roofs increases the efficiency of the panels. To ensure that the site makes the maximum possible contribution to green infrastructure, consistent with policies and biodiversity objectives, it is recommended that the provision of green roofs be secured by condition.
- 20.14 It is considered that the existing site does not provide a valuable contribution to biodiversity or ecology. It lacks suitable habitat for feeding or breeding birds, or potential habitable for bats. The proposed development provides an opportunity to significantly improve the quality of the biodiversity of the site and wider area, by both a comprehensive landscaping scheme and incorporation of enabling features within the fabric of the built development. An obligation and condition has been recommended, which would ensure that the applicant would be required to carry out a further assessment with regard to the Biodiversity value of the site, and also the proposed enhancements. In the event that the proposed measures do not result in a net enhancement, the applicant would be required to provide an obligation to the LPA, which would be used for off-site improvements within the vicinity of the development. Subject to such safeguarding conditions, it is considered that the proposed development would be acceptable.

## **21.0 Land Contamination and Remediation**

- 21.1 The NPPF (paragraph 121) requires LPAs to ensure that the site is suitable for the new uses proposed, taking account of ground conditions including pollution arising from previous uses. Adequate site investigation information, prepared by a competent person, should be presented. This reflects the requirements of policy DM15 of the DMP, which also requires an investigation of the hazards



posed and appropriate.

- 21.2 The application is accompanied by a Phase 1 and 2 Geo-Environmental Assessment [GEA], which summarises the extent of the land contamination on the site that has arisen from over a century of industrial activities. The GEA has been developed based on environmental information for the site obtained during various ground investigations. The report concludes that application site has a very low geo environmental risk to future occupiers, and also to future construction workers of the site.
- 21.3 The Council's Environmental Health Team has reviewed the GEA and consider this to be satisfactory. However, they have commented that ongoing investigations will need to be undertaken and accordingly safeguarding conditions are recommended to be attached.

## 22.0 **AERONAUTICAL**

- 22.1 Grange Farm Estate is noted as being within the identified flight path of RAF Northolt which is located approximately 4.25km to the south west of the application site. As part of the original application, the applicant submitted an aeronautical report in support of the application, which attempted to demonstrate that the proposed development would not result in any harm to the operation and safety of RAF Northolt. The Ministry of Defence is required to safeguard the operations and safety of this facility, which includes the approach and departure flight path to the west and north of the runway. Grange Farm Estate lies directly within the flightpath off the north eastern end of the runway. The following image (provided by Pager Power), demonstrates the two sites in question and their proximity.



- 22.2 The MoD was consulted under the original version of the scheme in 2016. In their response, the MoD identified that the development would sit within

protected airspace called the conical surface, and beneath the approach and take of cline for RAF Northolt. Furthermore, it was noted that the development sits within the area protecting the operation of the Instrument Landing System (ILS) and the Precision Approach Radar (PAR) that surveys the eastern approach to the main runway. In their original response (6<sup>th</sup> October 2016), the MoD objected to the scheme as result of the proposed buildings being of a height that breached the conical surface airspace. Furthermore, as a result of this breach, it would also project within the operating area of the ILS and PAR, which according to the MoD would result in detrimental effect on the performance of this equipment. Accordingly, the MoD objected to the scheme. As part of the objection to the scheme, the MoD provided maximum heights to the buildings to ensure that the proposed development would not conflict with the operation and safety of RAF Northolt.

- 22.3 In response to the above object from the MoD, the applicant undertook an extensive review of the design of the redevelopment of the site in an attempt to bring down the height of the blocks. Whilst other matters in relation to design are discussed elsewhere within the report, the impacts of the redesign insofar as the impacts on the RAF Northolt are discussed below. The amended development as mentioned previously, is restricted a Mayor of London requirement to ensure the development provides no net loss of affordable floorspace, which as a result as a direct correlation with the amount of market sale units to ensure that financially the development can be developed. Furthermore, the site is designated Open Space, and as such as much of the open space must be retained as possible. It is on this basis these restrictions that the development has been redesigned.
- 22.4 The current scheme now results in a much lower building height across the scheme, and the proposed design is reflective of the pressures in place across the site. However, as the amended application currently stands, the MoD still has an objection in relation to Block C within the full planning permission element, and also a number of blocks within the Outline element. Again, the applicants Aeronautical expert is in ongoing discussions with the MoD to resolve these areas of concern.
- 22.5 Notwithstanding the above, the MoD has stated that in the event that there is a successful planning permission, the applicant would still be required to liaise with the MoD in relation to Cranes. Given that such a development would be a largescale redevelopment with buildings of a height where crane would be required, the applicant would have to have a strategy in place to ensure that they would not in themselves become a hazard to the operational function of RAF Northolt. In the event that planning permission was granted, then a condition would be imposed to ensure that this document, in conjunction with dialogue with the MoD would be secured.
- 22.6 At the writing of this report, the matters raised above have not been resolved. Negotiations between the relevant parties is ongoing, and any update on the current situation (objection) will be presented to the Planning Committee via an addendum.

## 23.0 TRANSPORT AND PARKING

- 23.1 The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also contribute to wider sustainability and health objectives. It further recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. London Plan policy 6.3 states that 'development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed'. Policies 6.9 and 6.10 relate to the provision of cycle and pedestrian friendly environments, whilst policy 6.13 relates to parking standards. Core Strategy policy CS1Q seeks to 'secure enhancements to the capacity, accessibility and environmental quality of the transport network', whilst policy CS1R reinforces the aims of London Plan policy 6.13, which aims to contribute to modal shift through the application of parking standards and implementation of a Travel Plan.
- 23.2 London Plan Policy 6.3 *Assessing Effects of Development on Transport Capacity* requires the impact of proposals on transport capacity and the transport network to be assessed, and states that development should not adversely affect safety on the transport network. In addition to Transport Assessments and Travel Plans, the policy goes on to call for construction logistics plans and delivery & servicing plans to be secured. Local Plan Policy DM42 *Parking Standards*, DM43 *Transport Assessments and Travel Plans* seek to carry on from these policies.
- 23.3 The development site is located in Harrow to the south of the Borough. Roads around the site include Dudley Road to the north-west, Shaftesbury Avenue to the north-east and Northolt Road to the south-east. Existing roads within the site include Osmond Close, Wesley Close and Grange Farm Close, which are adopted by the Highways Authority and not have any parking restrictions / controls. Currently on site, there is an issue of uncontrolled parking from vehicles that are not residents of the estate, which places some pressure on the existing parking provision. The proposed redevelopment of the site would result in a re-organisation of the highway layout through the site, with a main link road between Shaftesbury Avenue and Dudley Road. Two secondary roads would provide links off of the main road. The application seeks to construct the new highway layout inclusive of car parking (at grade and within the podium), and the footpaths, which would then be passed over to the Highways Authority for adoption.
- 23.4 As already mentioned, the existing internal highways are adopted by the Highways Authority. However, from a procedural perspective, the applicant would be required to 'stop up' the existing highways as they are proposed to be realigned. Once the new highways have been constructed, then formal adoption by the Highway Authority can be pursued. During the stakeholder feedback, it was apparent that there are parking pressures within the estate, which are asserted as primarily being from vehicles not associated with the occupiers of the estate. The Highways Authority has acknowledged that there are parking pressures within the existing estate, although it does still appear to be

functioning. In the event that permission is granted and the above works are carried out, the Highways Authority would undertake the formal process for implementing parking controls, subject to the outcome of surveys / consultation for the area.

### *Access and Highways*

- 23.5 It is proposed to take vehicular access into and out of the site via Dudley Road and Shaftesbury Avenue as is the existing arrangement. A new road through the estate is to be created that would link the two via Wesley Close. The existing lay-bys to the north-west of Osmond Close on Shaftesbury Avenue would be removed to facilitate access to off-street parking for houses proposed as part of this application. Alterations to amend the on-street parking to the south-east of Osmond Close have been suggested to improve visibility. The Traffic Assessment indicates that double yellow line waiting restrictions would be required at the Wesley Close/Dudley Road junction. The development would utilise the existing access / entrances to the site, and as such, there is no objection to these arrangements as they would continue to provide access to a residential development (and larger) community facility.
- 23.6 A new pedestrian access is proposed leading from the development site into the retail car park serving Waitrose and other shops. This proposal is supported as it reduces the distance to South Harrow Station and further bus routes but also supplies a direct route to the shops which is considered a benefit.
- 23.7 The existing pedestrian access from Northolt Road is also proposed to be enhanced as part of the overall redevelopment of the site. Currently, the existing pedestrian access into the site runs along a very narrow accessway adjacent to the exiting Air Cadets Hall. By reason of the layout of the access, it results in a 'dog-leg' scenario, whereby foot traffic entering the site are unable to achieve a clear line of sight into the site. The failure to provide a clear line of sight into the development gives rise to concerns over secure by design and fear of crime. The proposed redevelopment of this accessway would result in the removal of the Air Cadets Hall, whereby providing both a much wider access into and out of the site, along with a clear line of sight into the development. This entrance was designed to achieve a clear line of sight into the development so that views would be able to pick up sight of the proposed community centre. Critically, this improvement to the access way from Northolt Road would be pedestrian only, which would improve the usability of this access, and ensure that more vehicles would not be entering or existing the site.

### *Trip Generation*

- 23.8 The transport assessment identifies that that there would be an overall increase in trips generated by this redevelopment. The predicted increase is fairly substantial at an additional 109 car driver trips in the AM peak alone. The following table provides a breakdown of the net increase in the amount of person trips generated from the site as a result of the total redevelopment:

**Table 6.7** Net Change in Total Person Movements – AM and PM Peak

Mode	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
Car Driver	+26	+103	+129	+57	+33	+90
Car Passenger	+1	+5	+6	+3	+2	+5
London U'Ground	+19	+77	+96	+42	+24	+66
Rail	+4	+17	+21	+9	+5	+14
Bus	+10	+43	+53	+24	+13	+37
Pedestrian	+7	+21	+28	+17	+8	+25
Cyclist	+1	+3	+4	+2	0	+2
Other	+1	+4	+5	+3	+1	+4
<b>Total</b>	<b>+69</b>	<b>+273</b>	<b>+342</b>	<b>+157</b>	<b>+86</b>	<b>+243</b>

23.9 The submitted Transport Assessment provides evidence on the existing development and what the vehicle movements of this are, and its impacts on the surrounding highway network. This includes both the residential and community uses of the site. The Transport Assessment then goes on to assess the impacts of the full planning permission and also the outline element (based on the amount of units proposed and floorspace of the community centre). However, the above sets out the projected impacts of the total redevelopment of the site. Of note the proposed development would increase the trip generation for the site by 129 vehicle movements in the AM, and 90 trips within the PM.

23.10 The above details that there would be a noticeable increase in the amount of trips generated by the redevelopment of the site. In determining the impact that such an increase would have on the surrounding highway network, a number of nearby intersections are reviewed to determine the impact the development would have on their functioning. The detailed assessment is captured within a number of comparative tables within the submitted Transport Assessment, however, the following provides a brief overview of each of the nearby intersections;

*Wesley Close / Dudley Road Priority Junction*

23.11 All junction approach arms would continue to operate within capacity and with only marginal increase in queuing as a result of the proposed development.

*Grange Farm Close / Shaftesbury Avenue Priority Junction*

- 23.12 All junction approach arms would continue to operate within capacity and with only marginal increase in queuing as a result of the proposed development.

*Shaftesbury Avenue / Dudley Road / Merton Road Crossroads*

- 23.13 All junction approach arms would continue to operate within capacity and with only marginal increase in queuing as a result of the proposed development.

*Northolt Road (A312) / South Harrow Retail Park / Cowen Avenue Roundabout*

- 23.14 All junction approach arms would continue to operate within capacity and with only marginal increase in queuing as a result of the proposed development

*Shaftesbury Avenue / Northolt Road (A312) / Middle Road / Roxeth Hill (A4005) Signalised Junction*

- 23.15 The proposed development is noted as having an impact on this intersection. The submitted Traffic Assessment identifies that traffic flow conditions for the signalised junction will experience minor increases in degrees of saturation and queuing on the majority of approaches over both peak periods. The only arms that will function with degrees of saturation above 100% are the Lower road and Roxeth Hill approaches in the PM peak period. Although, it is already noted that these arms already perform with a degree of saturation above 100% prior to the addition of development traffic. The junction as a whole continues to operate marginally over capacity, as it does currently. It is considered that the increased delay as experienced by drivers traversing the junction is not significant or severe.

- 23.16 The Highways Authority have reviewed the submitted Traffic Assessment and the conclusions drawn on the effect the proposed development would have on the surrounding highway network. Although priority junctions and roundabouts seem to fair well, the signalised double junction at Northolt Road, Shaftesbury Avenue, Lower Road, Roxeth Hill and Middle Road is a cause for concern as the assessment indicates that this junction is already at full capacity and queue lengths are predicted to double. Transport for London are in the process of installing controls (SCOOT) at this junction which is a tool used to link signals to improve traffic flows through junctions. Should the development proceed, it should be understood that the operation of the junction is likely to be impeded. However, it is noted that this would not be considered as a severe impediment over and above what is currently experienced at this intersection.

#### *Parking*

- 23.17 London Plan Policies 6.9 *Cycling* and 6.13 *Parking* give effect to the London Plan cycle and vehicle parking standards, including requirements for electric vehicle charging points (ECPs), parking for 'blue badge' holders and for cycle parking in particular to be secure, integrated and accessible. Local Plan Policy DM42 includes criteria relevant to parking considerations.

- 23.18 Currently, the site provides for 282 residential properties and a small community

centre. With regard to the parking on the site, this appears as relatively ad-hoc, but is in the order of 140 spaces, with another approximately 66 'on-street' spaces. Stakeholder consultation identified that with regard to parking within the estate, there is a notable amount of vehicles that are not directly associated with the existing residential occupiers of Grange Farm Estate. The applicant has carried out a parking survey of the site and surrounds, in an attempt to determine parking stress levels within the area. As part of this survey, it was attempted to disseminate between parked vehicles that were within the ownership/use of residents on the Estate, and those that were not associated within the site, but utilise the unrestricted parking offered by the Estate. For the purpose of the survey, vehicles that were present before 05:00 were considered to be residential (i.e. vehicles associated with the existing occupiers of the Estate), and those arriving after 05:00 being vehicles not associated with the occupiers of the Estate.

- 23.19 The results of parking survey indicated that there were a total of 174 parked residential vehicles, with 29 non-residential. In the evening there were 58 residential parked cars, with 60 non-residential parked vehicles. The submitted evidence indicates that approximately half of the parked non-residential vehicles were staying longer than 1 hour. Furthermore, site observations indicates that the majority of the non-residential vehicles parked on the site in the morning, continued on foot in the direction of South Harrow Underground Station
- 23.20 The proposed parking ratio at 0.46 is acceptable in terms of London Plan and Development Management Policy compliance. In discussions with the developer the Highways Department have resisted any reduction in this level of provision in a bid to safeguard the surrounding environment, however, as demonstrated by the parking survey, there is a fairly high amount of non-residential parking on the existing roads which if not discouraged will transfer on to the redeveloped site due to its proximity to South Harrow underground station. To this extent, the Highways Authority have requested financial obligations, which would firstly resource the relevant assessment required to determine if parking controls are required, and if so to resource their implementation. It is important that a contribution towards investigation of need for a controlled parking zone is provided, which is set out within the obligations. Accordingly, the proposed development would seek to provide a quantum of parking that would be policy compliant from both a London wide and local level. The introduction of a Controlled Parking Zone (If deemed necessary) would ensure that the commuter parking would not continue to occupy parking spaces within the Estate, whereby ensuring that the parking spaces made available are actually utilised by the intended population i.e future occupiers of Grange Farm Estate.
- 23.21 Much of the parking would be on-street but there would also be a basement car park with about 88 spaces. Provision for disabled parking would be made at a rate of 10% (26 spaces) of the proposed number of parking spaces however, the requirement is actually supposed to be 1 per wheelchair accessible unit which is 10% of the total number of units proposed which would amount to 57 spaces. These figures are based on current London Plan standards; the amount required may be different if the draft London Plan standards are considered. Electric vehicle charging points would also be provided at a rate of



20% active and 20% passive. Motorcycle parking should also be provided at a rate of 1 space per 20 car parking spaces. A parking management plan should be conditioned. This is to ensure that appropriate measures will be in place should any of the roads within the site not be dedicated for adoption. For Phase 1 (details), it is necessary to demonstrate where the electric vehicle charging points are intended to be placed otherwise a specific condition must be added – condition.

- 23.22 The two proposed car club spaces are welcomed. The developer has indicated that they would be willing to enter into an agreement with a car club operator and would provide 3 years free membership to residents of the development. The club should be open to other occupiers of the local area including residents and businesses. The management and operation of the car club should be included within the Travel Plan. If the car club bay is positioned on adopted highway, a contribution of £3000 towards order making and installation costs will be required, which is included as part of the obligations.
- 23.23 Cycle parking proposals are for a minimum of 943 spaces which equates to a ratio of 1.6 per unit. Further spaces would be provided for the community use element. Details of the type of storage units seem to show stacker type storage. The London Plan requires that a minimum of 5% of cycle storage is accessible, meaning that it can be used by non-standard bikes/trikes/children's cycles etc. Some of the stacker storage for the flats should be substituted for Sheffield stands which would meet this requirement.

#### *Servicing, Refuse and Emergency Services Access*

- 23.24 In order to facilitate refuse collections, the development has been designed to ensure that vehicles will be able to stop within 10 metres of the collection points for all dwellings. The swept path diagrams have been reviewed and demonstrate that suitable access will be provided.
- 23.25 Access for all three functions has been considered within a delivery and servicing plan. Large numbers of deliveries are not anticipated and most are expected to be undertaken by vans rather than trucks or lorries. The information provided demonstrates that access can be maintained whilst deliveries take place.
- 23.26 The community hub would have its own servicing bay.

#### *Walking and Cycling*

- 23.27 The pedestrian Level of Service Assessment indicates that the site will bring about an improved pedestrian environment and the existing and continuing surrounding areas are of an acceptable standard too. As mentioned previously, the existing walkway from the site onto Northolt Road is of poor quality, insofar as its layout, which leads to existing occupiers of the site being hesitate in utilising it. This is particularly relevant during hours of darkness. The proposed walkway would open up this entrance to the site, providing a much wider access with a clear line of sight into the development. These improvements are greatly



encouraged, as they would provide greater confidence in the accessibility to the site from Northolt Road, and as such the assist in the success of the scheme.

- 23.28 A second access would be provided from the site into the Waitrose Car Park, which is located to the south of the site (Between the ends of proposed Block P & Q). Currently, there is no direct access to this resource, with existing occupiers of the estate having to walk down the poorly laid access mentioned above, and along Northolt Road. The proposed walkway / access to Waitrose Car Park would link the two properties, and is noted as being set within an area of the site that is subject to a noticeable level change. The proposed walkway would therefore be set out as a 'switch-back' design between the ends of the two blocks (P & Q), which would be required to ensure that it would be able to comply with accessibility matters. The proposed access would be an improvement to the permeability of the site, and offer future occupiers a more direct route to public amenities. Notwithstanding this, further information would be required to ensure that this element would comply with secure by design matters, whilst still ensuring an accessible for all route to and from the site.
- 23.29 As mentioned previously, the proposed development would result in cycle storage in line with London Plan (2016) standards. The quantum and accessibility of this facility is assessed elsewhere in the report. However, the improved access ways within the site would, similar to walking, allow for a greater link to the surrounding areas. However, the proposed development would not improve or encourage the use of the cycling across the Borough as a whole, which is noted as having a very low uptake in cycling. Much of this is down to a poor level of suitable infrastructure to support such a mode of transport. Notwithstanding this, the proposed development would make a provision for the policy compliant amount of cycle spaces for the development, and provide for an improved access / egress to the site.
- 23.30 It is considered that the existing access points to the site which would be retained, in conjunction with the improvements mentioned above, would result in the site becoming more accessible to occupiers / visitors to the site. The improved access points would be of a benefit to the overall scheme, and would assist in promoting both walking and cycling for the occupiers of the development, by allowing for a greater accessibility to local amenities and transport links.

#### *Highway Materials*

- 23.31 The detail of the hard standing is discussed elsewhere within this report. Notwithstanding the concern in relation to the balance of hard and soft landscaping, the choice of materials is considered acceptable. The Highways Authority is amenable to adopting the internal highways, and the onus would be on the developer to ensure that the selected materials would be to the satisfactory of the Highways Authority, allowing the adoption of them.

#### *Public Transport*

- 23.32 The proposed development would result in significantly more occupiers at the

site, which inevitably places more pressure on the existing public transport services. The site is surrounded by existing highways, each which support some form of bus service, totalling nine services in total. To the east of the site is Northolt Road, which is noted as having several buses that operate along it. It is therefore considered that notwithstanding the increase in additional trips, given the amount of services, the uplift is likely to be spread and therefore sufficient to cater for the future residents.

- 23.33 The submitted Transport Assessment concludes that there would be an increase of 8.2% in passenger numbers at South Harrow Station. Based on this and the capacity of the service, it is not considered that the increase in users would be severe. However it would be for TfL to determine the need for mitigation if it is considered that this amount cannot be reasonably catered for without changes. Comments have been received by TfL and there comments are considered elsewhere within this report.
- 23.34 The transport assessment looked at the effects of this proposal alone and did not take into consideration the implications of increased public transport use generated by other consented developments. Whilst it desirable that a cumulative approach be taken in relation to the impacts of other developments, it is still considered unlikely that cumulative impact would result in an unacceptable scenario that would warrant a refusal.

#### *Transport for London*

- 23.35 Transport for London (TfL) has been consulted in relation to this application, both under the original scheme in 2016, and also the amended scheme submitted in December 2017. Whilst the full response is provided under 4.12 above, it is noted that there was no objection to the scheme from a Highways perspective. Following on from the original permission, an amended scheme was submitted to overcome an objection from the MOD in relation to RAF Northolt. Transport for London provided an addendum relating to the revised scheme (copy of comment above under 4.12), and maintain their no objection. However, TfL in their second response has made reference to increasing the amount of cycle storage to meet draft London Plan (2017) standards, which would be approximately 95 cycle spaces. Whilst the requirements of the draft London Plan (2017) are noted, this plan is still very early on in its process, and therefore it is not known what matters would be objected to or carried through into the final plan. Accordingly, only limited weight can be afforded to this document where it differentiates from the adopted London Plan (2016). As such, the proposed development is in accordance with the adopted London Plan (2016), and as such it considered satisfactory in this instance.

#### *Conclusion*

- 23.36 The proposed development would result in a significant increase in the population of the site, which would result in more comings and goings from the site; both vehicular and pedestrian. The submitted information in support of the application has concluded that there would be a noticeable increase in the pressure on both the surrounding high network and public transport system. The

supporting information notes that one of the intersections (*Shaftesbury Avenue / Northolt Road (A312) / Middle Road / Roxeth Hill (A4005) Signalised Junction*) is already operating beyond capacity. However, the proposed development, whilst exacerbating this current situation, would not be to a point that would be considered 'severe'. Again, whilst there would be a noticeable increase in the use of the local public transport, there would still be capacity to continue operating similar to existing. The submitted information has been reviewed by the Highways Authority and Transport for London, who have not objected to the scheme. Accordingly, the proposed development is considered to be in general accordance with the policies listed above.

## **24.0 CONCLUSION AND REASONS FOR APPROVAL**

- 24.1 The proposed development of the site would provide for the regeneration of a housing estate, which currently provides a very low quality, and not fit for purpose housing stock. The current housing stock, being affordable in tenure, would be replaced with an increase in affordable tenure floor space across the site, of a much higher quality. Furthermore, the proposed development would also provide for an increase over and above this with an offer of 333 private sale units, which would assist in funding the affordable element, and also provide a valuable contribution to the Borough's housing stock. The proposed housing stock would provide good quality of residential amenity for future occupiers, whilst not unacceptably harming the amenity of neighbouring occupiers. The proposed development would also result in the demolition of a poor quality community centre located on the site, and its replacement with a much more modern, multi-use, fit for purpose facility for the development site and wider community. Lastly, the proposed development would result in a much higher quality open space across the site, again, for the use and enjoyment of the future occupiers of the estate and also the wider community.

## **APPENDIX 1: CONDITIONS AND INFORMATIVES**

### **Conditions**

To be reported to Planning Committee via addendum.

## APPENDIX 2: SITE PLAN



## APPENDIX 3: SITE PHOTOGRAPHS

### 2.10 Existing Estate

The following images document the existing Grange Farm Estate by local professional photographer June Cadogan.



Existing pedestrian entrance to the site from the Northolt Road



Existing site fronting onto Shaftesbury Avenue



Existing site entrance off Dudley Road

©Hawkins|Brown & Grant Associates



Osmond Close bungalows

19



## 2.10 Existing Estate



Inadequate refuse stores



No dedicated private amenity space, some ground floor units have occupied unofficial boundaries



Lots of open space - but it is poorly defined

©Hawkins/Brown & Grant Associates



Buildings have reached the end of their life span, they are too hot in the summer and too cold in the winter

20

## 2.10 Existing Estate



Lack of legibility - where is the front door?

©Hawkins/Brown & Grant Associates



Municipal playground

21



## 2.10 Existing Estate



Indistinct and inadequate community facilities



Roads are dominated by parking

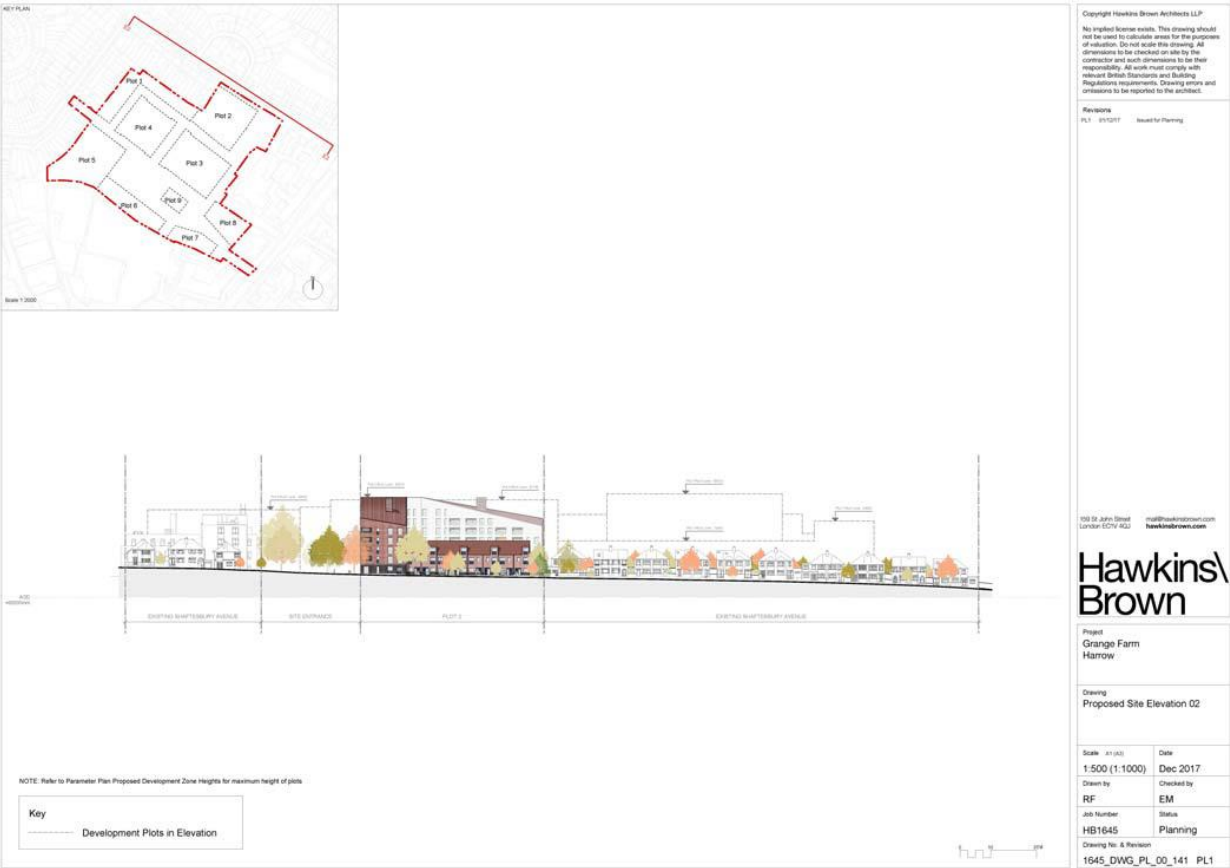
©Hawkins/Brown & Grant Associates



The existing mature trees are one of the sites greatest assets

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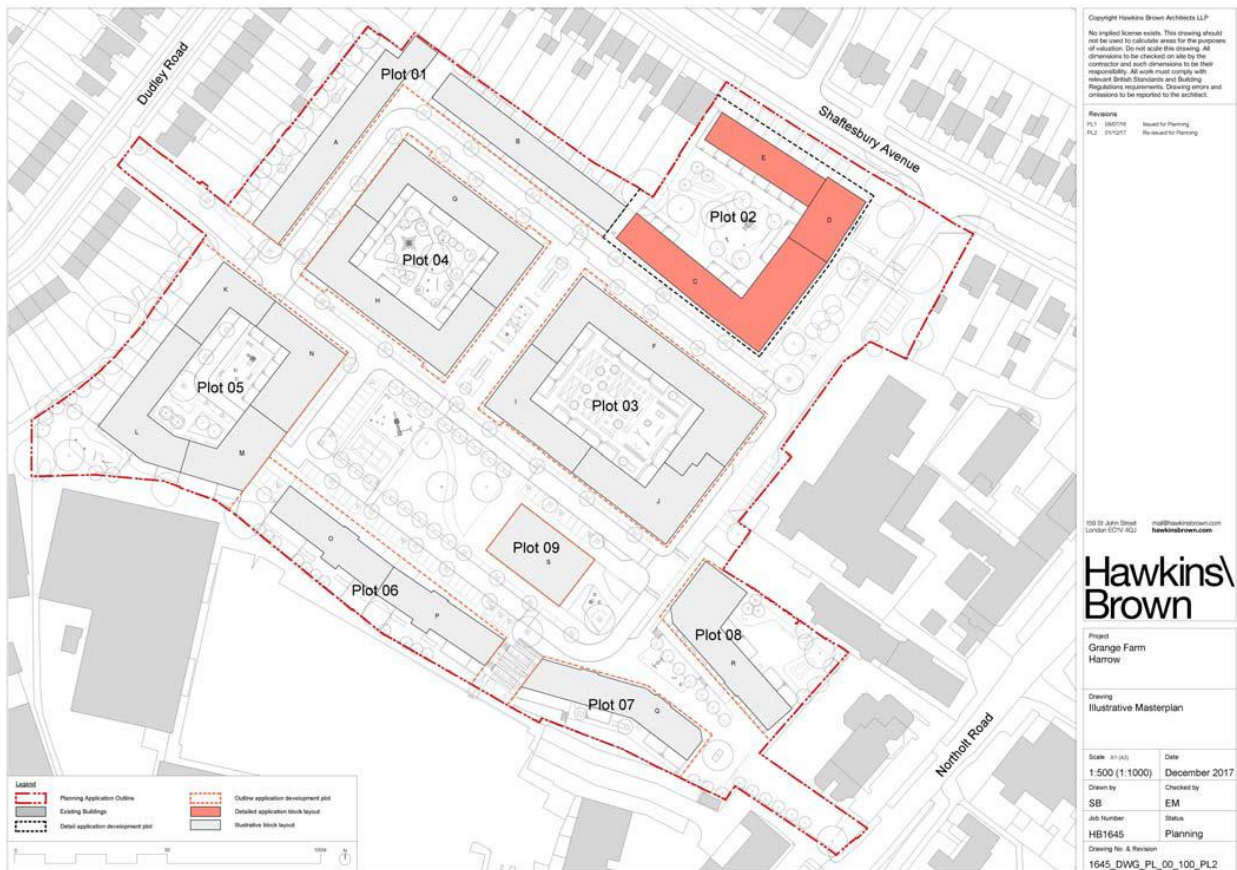
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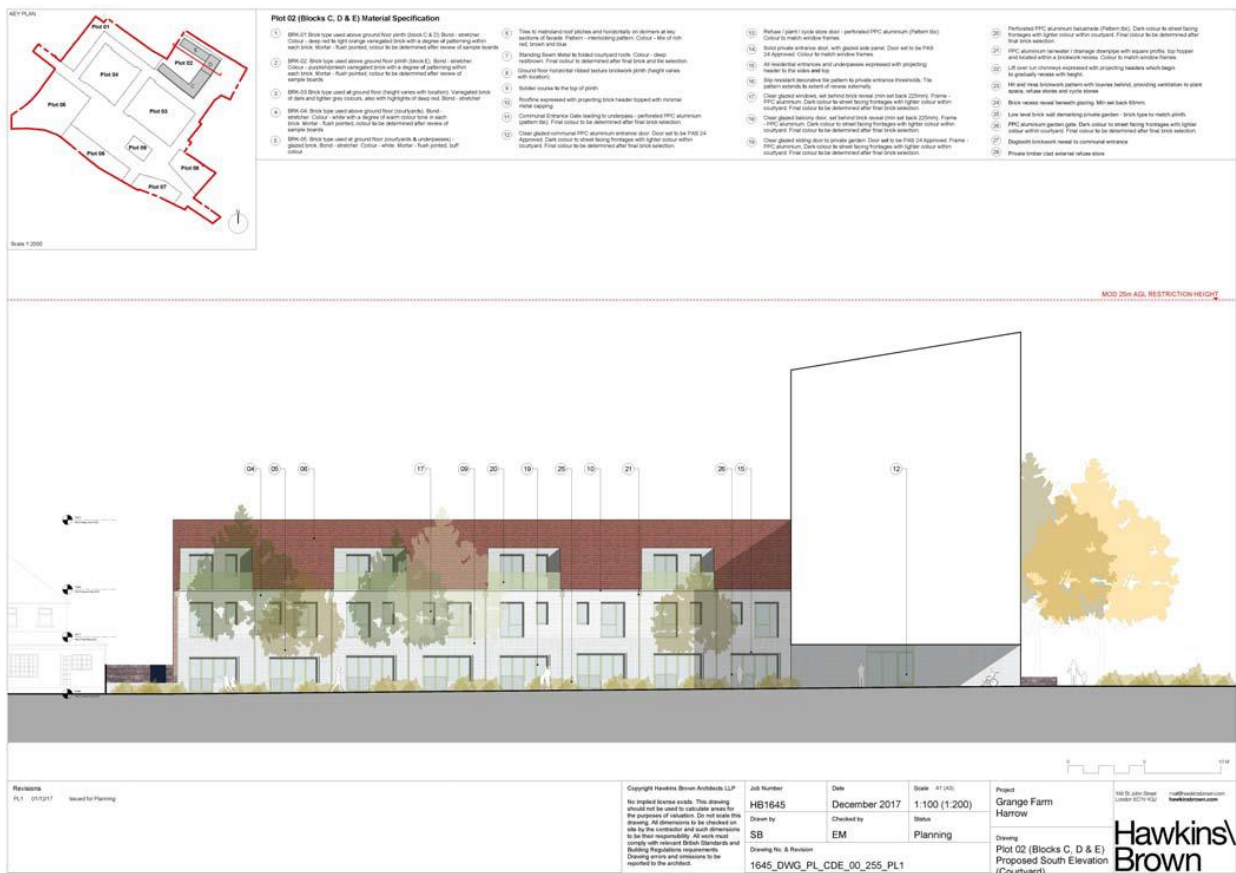
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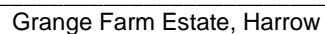




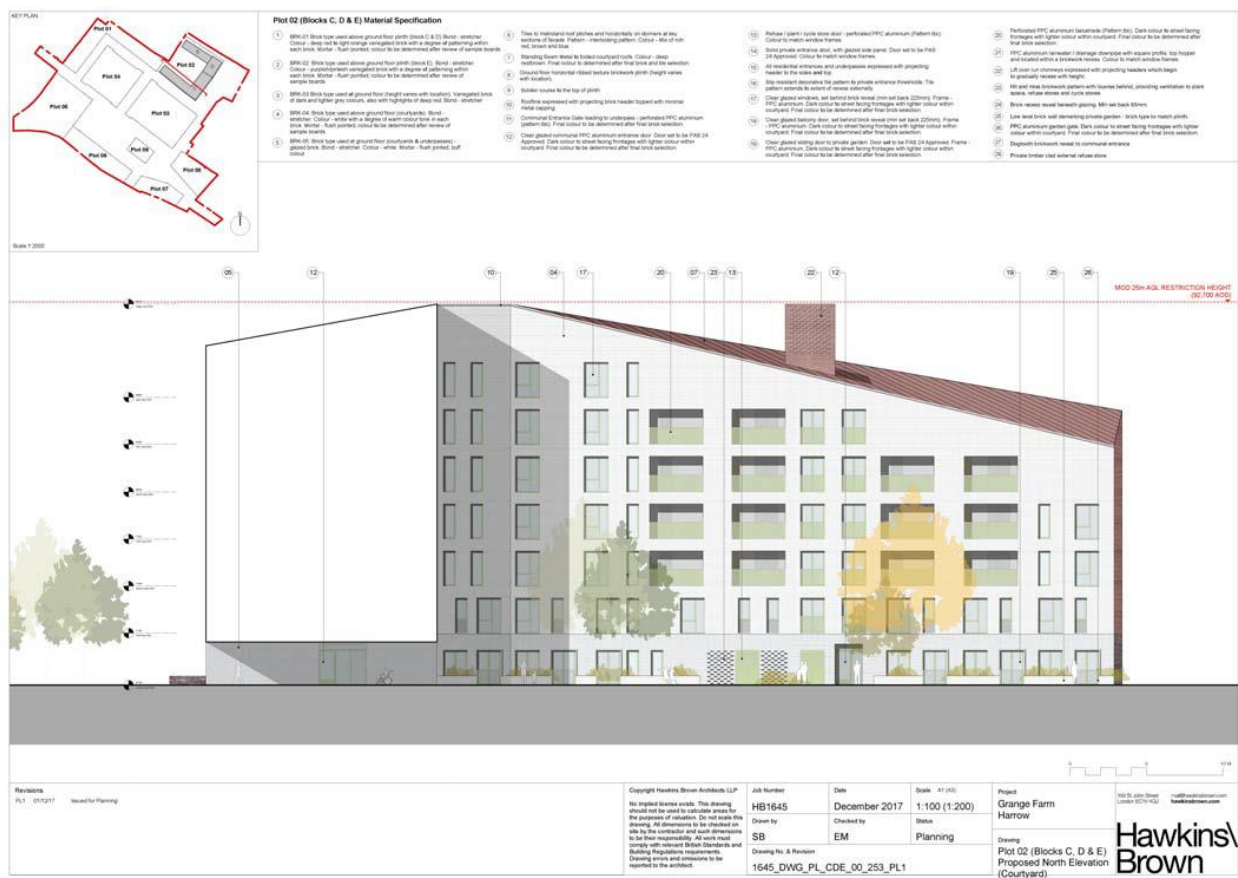
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