

PROOF OF EVIDENCE  
OF  
CALLUM SAYERS  
DATED: 14 June 2021

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Pursuant to Rule 15  
of the Compulsory Purchase (Inquiries Procedure) Rules 2007  
(modified by the Compulsory Purchase (Inquiries Procedure)  
(Miscellaneous Amendments and Electronic Communications) Rules 2018)

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**THE LONDON BOROUGH OF HARROW  
(GRANGE FARM ESTATE REGENERATION PHASES 2 AND 3)  
COMPULSORY PURCHASE ORDER 2020**

Section 226(1)(a) of the Town and Country Planning Act 1990  
The Acquisition of Land Act 1981

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## **1. INTRODUCTION**

- 1.1 My name is Callum Sayers. I hold a Bachelor of Resource & Environmental Planning (Hons) from Massey University, New Zealand.
- 1.2 I have ten years of experience working for local government planning departments at the London Borough of Hounslow and the London Borough of Harrow (“the Council”). My experience encompasses roles as a planning Enforcement Officer, Development Management Officer and a Policy Officer. I have experience in processing complex planning applications, including large scale majors developments.
- 1.3 I was the case officer for the Grange Farm Estate planning application, which relates to the London Borough of Harrow (Grange Farm Estate Regeneration Phases 2 and 3) Compulsory Purchase Order 2020 (“the Order”).
- 1.4 This evidence focuses on the land use planning, relevant planning policy considerations, the benefits and deliverability of the scheme within the context of the proposed acquisition.
- 1.5 References to the prefix **[CD]** followed by a capital letter and a number (by way of example **[CDX.01]**) in this evidence represents a document’s reference in the Core Documents prepared by the Council. A list of the Core Documents is provided with this evidence. For ease of reference and unless specified otherwise in this evidence, the definitions (being capitalised words) used in this evidence will be the same as they appear in the Council’s Statement of Case **[CDC4]** and the written evidence of the Council’s other witness.
- 1.6 To avoid repetition, this evidence may at times refer to sections of the Council’s Statement of Case **[CDC.4]**.

## **2. THE SCHEME**

- 2.1 The scheme and the its location is described in Sections 1 (Introduction), 2 (Background) and 3 (Description and Location of the Order Land) of the Council’s Statement of Case **[CDC.4]**.

- 2.2 A hybrid planning permission under reference P/3524/16 **[CDB.1]** for the Regeneration Scheme was approved by the Council on 29 March 2019 and comprises the following 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 dwellings; 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 of up to max 93.70metres in height above ordnance survey to provide 485 dwellings; Community Centre (up to 1,350sqm) for D1/D2 uses within Plot 9; Community Facility (up to 282sqm) for D1 use within Plot 7.
- 2.3 The intention of the Council is that the Regeneration Scheme will be delivered in three phases; supported by and in line with its current decant strategy. Phase 1 of the Regeneration Scheme (the detailed element of the scheme) is being delivered by the Council and is entirely affordable housing comprising 89 dwellings made up of 68 replacement social rent housing and 21 shared ownership units.
- 2.4 Phase 1 of the permitted scheme has commenced and is well advanced with handovers currently anticipated to be in 2022.
- 2.5 A compulsory purchase order was not required for Phase 1 of the Regeneration Scheme as the Council obtained vacant possession of the properties required for the delivery of that phase.
- 2.6 Phases 2 and 3 of the Regeneration Scheme (the outline element) will provide the remaining 485 dwellings comprising 300 units for private sale and 185 affordable housing units along with a replacement community facility.
- 2.7 The Order Land is required for the delivery of Phases 2 and 3 of the Regeneration Scheme. It is intended to deliver these through a phased programme of demolition and redevelopment.
- 2.8 As demonstrated later in this evidence, such is the poor quality of the existing accommodation and environment in the Estate, the Regeneration Scheme would deliver considerable benefits for residents and the wider area. The design rationale

for the Regeneration Scheme is to ensure that the development stitches into the existing urban fabric. The development therefore needed to tie in with the traditional Metroland character located to the north and west of the Estate and then the more densely urban character along Northolt Road to the east.

- 2.9 Consequently, the Design Code submitted and approved as part of the hybrid permission sets three distinct characters across the application site, namely Metroland to the north/west of the site, before changing to medium-scale buildings identified as courtyard blocks. 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 application 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

*Phase 1 - Full Planning Permission*

- 2.10 The full planning permission for Phase 1 (Plot 2) of the Regeneration Scheme will provide a 100% affordable housing units (89 dwellings in total) made up of 68 social rented units and 21 shared ownership units along with provision of 26 car parking spaces and 151 cycle spaces.
- 2.11 Phase 1 will comprise three buildings (Blocks C, D and E) [**CDB.2.2 , para 2.4**] ranging from three to seven storeys. Block C would be an L shape building in the north-western corner of the site, 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 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 12m. From the corner roof height of 19m, it would increase to a height of 25m, before decreasing down to an eaves height of 17m nearer the point it becomes adjacent with Block B.
- 2.12 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 would be flats. Block C would provide 60 units, all of which would be social rent. Four of the units would be designated as wheelchair units. Internal refuse and cycle storage would be provided.

- 2.13 Block D would be located on the western side of the primary access into the site from Shaftesbury Avenue. It would run in a more north to south orientation, and be located on the eastern end of proposed Block E. Where it connects with Block C, it would be 20m in length, with a depth of 12m. It would have five floors of accommodation at the northern end with a roof height of 18.2m, before increasing to 6 floors, with a height of 25m.
- 2.14 Block D would provide 21 units, all of which would be shared ownership. Amenity space would be provided by way of projecting balconies and internal cycle and refuse storage would be provided.
- 2.15 Block E would be located in the north western corner of the site, fronting Shaftesbury Avenue and located between the existing dwellings to the east and proposed Block D. It would be 44m in length where it joins Block D, with a depth of 10m. 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. Each of the rear gardens would have two secure cycle spaces. Off-street parking would be provided directly from Shaftesbury Avenue, along with secure bin stores.
- 2.16 The existing highway network within the Estate does not allow for vehicle permeability within the Estate. Therefore, the full planning permission proposes a realignment of the highway network which would result in a primary road accessed from Shaftesbury Avenue and would travel south west for approximately 150m. It would then change direction 90 degrees to travel 225m to provide access to Dudley Road. This would provide the primary thoroughfare through the development. A stopping up order for the existing highway has been made to facilitate the implementation of the planning permission and allows for the new highway to be adopted by the local highway authority. The intention is that not all of the new highway will be adopted.
- 2.17 Two secondary highways are also proposed as part of Phase 1 of the Regeneration Scheme, each of them looping off the primary road before linking back to it. Each of these roads would be shared surfaced to enable a more pedestrian-dominated area.
- 2.18 The primary pedestrian access to the site will be to the south-east from Northolt Road. 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.

### Phases 2 & 3 - Outline Planning Permission

- 2.19 Phases 2 and 3 of the Regeneration Scheme make up the outline element of the planning permission and for which the Order Land is required.
- 2.20 Phases 2 and 3 will involve the erection of Blocks A, B, F, G, H, I, J, K, L, M, N, O, P, Q, R and S [**CDB.2.2 , para 2.4**] and will provide 485 dwellings in total comprising 148 social rent units, 4 shared ownership units and 333 private sale units along with 234 car parking spaces and 792 cycle spaces.
- 2.21 Other than the access, all other matters for Phases 2 and 3 are reserved for future consideration. However, the parameter plans submitted with the outline application sets out the maximum building envelopes and heights of the buildings to be provided within Phases 2 and 3. In addition, the approved Design Code sets out the fundamental parameters for the outline elements of the masterplan and would assist in ensuring the delivery of a coherent, high quality and successful residential neighbourhood.
- 2.22 A new, larger, more modern and more functional and flexible community facility is to be provided as part of Phase 3 (Plot 9, Block S) to replace the existing small community centre located on the Estate. This new larger community centre will allow the co-location of existing community resources and provision of new resources accessible both to the residents of Grange Farm and the wider area.
- 2.23 The design rationale for the proposed community facility comes from the historic former barn that was located on the site. The Design Code provides details on how the design is to follow the barn-like features, resulting in a standalone building with a steeply pitched roof and requires hard wearing materials of a more rural flavour to be utilised within the finishing of the structure to ensure that the building provides a nod to the historic use of the site.
- 2.24 The Design Code also provides a breakdown of the uses that the new community centre must provide and sets a minimum amount of floorspace to be divided up into the varying uses.
- 2.25 The current open spaces across the Estate are of a poor quality. As a result of the poor quality and relationship of the open spaces to the housing stock on the Estate, there is a lack of definition and ownership of the open spaces. As such, the existing open space set aside for amenity space is underutilised. Further, a one “one size fits all” play space is provided for the entire Estate and this is also of poor quality with dated

equipment that is not suitable for all age groups of children presently on the Estate. Moreover, the poor design and layout has created areas which have become prone to anti-social and criminal activity. This has been addressed in the design of the new scheme, which incorporates design elements developed to reflect local crime prevention input.

- 2.26 The approved scheme seeks to create clearly defined, usable open spaces for both public and communal use, to maximise the functionality of the open space and provide a wide variety of relaxation, recreation and social opportunities. The open space strategy will foster community interaction through the use of productive gardens and play spaces including a Multi-Use Games Area.
- 2.27 When completed, the Scheme will deliver a new lifetime neighbourhood that naturally connects with the wider borough and breaks down the barriers between the Estate and the surrounding areas.

#### Section 106 Agreement

- 2.28 As the planning application was submitted by the Council and the Council cannot enter a section 106 agreement with itself, a “shadow” Section 106 agreement **[CDB.4.1-4.4]** has been drafted to sit alongside the planning permission. The conditions attached to the planning permission and the “shadow” Section 106 agreement) secure the following matters :
- (i) the developer to provide 282sqm of floor space for the relocation of the Ministry of Defence’s Air Cadets facility (and to ensure their relocation at the earliest practical timing;
  - (ii) 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;
  - (iii) a minimum of 241 dwellings (15,709sqm social rent and 1,611sqm shared ownership) on the site to be provided as affordable dwellings in accordance with a schedule of accommodation (to include details of tenure and mix) to be approved in writing by the Council prior to commencement of the development;



- (iv) 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 dwellings to be provided on site, in the first instance, otherwise as a cash in lieu sum for offsite provision;
- (v) 10% of affordable dwellings to be constructed as wheelchair dwellings and ready immediately upon completion for occupation by a wheelchair user;
- (vi) 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;
- (vii) the highways within the development are to be 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;
- (viii) 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;
- (ix) 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;
- (x) 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;
- (xi) 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;

- (xii) 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;
- (xiii) an employment and training plan that will be agreed between the Council and the developer prior to start on site
- (xiv) 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
- (xv) 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
- (xvi) 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; and
- (xvii) 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.

### **3 PLANNING POLICY COMPLIANCE**

- 3.1 The Regeneration Scheme was designed having regard to the relevant prevailing planning policies of the National Planning Policy Framework **[CDB.7]** and the Council's

development plan which comprised the London Plan 2016 **[CDB.10]**, the Harrow Core Strategy 2012 **[CDB.9]**, and the Development Management Policies Local Plan 2013 **[CDB.8]**.

- 3.2 The Draft London Plan 2017 had been published by the Mayor of London at the time the planning application was determined by the Council's Planning Committee. However, as the emerging plan was still in its initial stages, it was given only limited weight in the determination of the planning application in line with the guidance in the National Planning Policy Framework.
- 3.3 The Regeneration Scheme was considered by the Council's Planning Committee to be in accordance with the development plan in the round and, where departures from policy were necessary, these were fully justified and the planning benefits of the scheme outweighed these concerns, and therefore were not deemed to be significant to warrant a refusal of the planning application.
- 3.4 The following paragraphs provide a summary of the key planning policy objectives against which the Regeneration Scheme was assessed. A detailed assessment of the application against the relevant policies are set out in the officer's report to planning committee.

### **Principle of Development**

#### *National Planning Policy Framework*

- 3.5. The National Planning Policy Framework ("NPPF") **[CDB.7]** was first published in March 2012 (and updated in February 2019) and it sets out the Government's economic, environmental and social planning policies for England to support sustainable development and how these are expected to be applied. The NPPF is a material consideration in the determination of planning applications.
- 3.6. At the heart of the NPPF is a presumption in favour of "*sustainable development*" which is defined as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The NPPF sets out three objectives of sustainable development namely an economic, social and environmental role.
- 3.7. Local authorities are encouraged to apply the presumption in favour of sustainable development in both plan-making and decision taking. For decision taking, this means

*“approving development proposals that accord with an up-to-date development plan without delay.” (para 11(c), NPPF)*

#### *London Plan 2016*

- 3.8 The London Plan 2016 **[CDB.10]** sets out the overarching spatial policy objectives for London. It sets a fully-integrated economic, environmental, transport and social framework for the development of the capital to 2036. A key aim of the London Plan is to plan for continued growth and this means in practical terms planning for a growing population and ensuring that London has the required dwellings, jobs, services and opportunities that a growing population need.
- 3.9 Policy 3.3 (Increasing Housing Supply) sets out one of the Mayor's key objectives which is to ensure that London meets the challenges of population growth through the provision of sufficient new high quality dwellings. It targets an annual average of 42,389 new dwellings across London, with the target for the Council being 593 new dwellings per annum.
- 3.10 Policy 3.4 (Optimising Housing Potential) seeks to optimise the density of development with consideration for local context and public transport capacity.

#### *Harrow Core Strategy 2012*

- 3.11 The Harrow Core Strategy **[CDB.9]** was adopted in 2012 and sets out the vision and key objectives for the borough. The Core Strategy seeks to achieve a minimum of 6,050 net additional dwellings between 2009 and 2026.
- 3.12 Policy CSIA (Overarching Principles) directs growth to town centres and strategic, previously developed sites
- 3.13 Policy CS3(J) in particular provides that *“The Council will support proposals which achieve physical renewal and estate regeneration objectives at Grange Farm.”* The Estate is located within the Core Strategy Policy Sub Area: Harrow on the Hill & Sudbury Hill. Area Objective 10 for that Sub Area is to “Support the residential development of identified, previously-developed sites and opportunities for the renewal of the Grange Farm Estate.”
- 3.14 The redevelopment of the Grange Farm Estate is, therefore, well supported in planning policy terms. At a national level, the NPPF places a strong emphasis on the presumption in favour of sustainable development, with one of its core principles being

the reuse of brownfield land. At a regional level, the London Plan identified the pressing need to deliver dwellings in the capital, with an annual target of 42,000 units per year. At a local level, CS3(J) has specifically earmarked the Estate for renewal.

- 3.15 The Regeneration Scheme is reusing a brownfield site and providing sustainable, residential-led, development which will make a significant contribution towards housing supply and quality in London.

## **Design**

- 3.16 The Government's commitment to good design remains a key component of the NPPF. Design is considered a key aspect of sustainable development and should be a key consideration in the planning process.

- 3.17 In particular, paragraph 128 of the NPPF **[CDB.7]** states:

*“Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.”*

- 3.18 Policy 3.5 (Quality and Design of Housing Development) of the London Plan 2016 **[CDB.10]** requires developments to be of the highest design quality, both internally and externally, taking into account local character density, tenure, and land use mix. Subsidiary to this policy is the Mayor's Housing SPG, which provides greater detail as to the standards of dwellings.
- 3.19 Policy 3.7 of the London Plan 2016 (Large Residential Developments) requires developments that can accommodate over 500 dwellings to explore the possibility of including higher densities and coordinate the development of further infrastructure, creating neighbourhoods of distinctive character and sense of place.
- 3.20 Policy 5.3 of the London Plan 2016 (Sustainable Design and Construction) requires the highest standards of sustainable design and construction to be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.
- 3.21 London Plan 2016 Policy 7.1 (Lifetime Neighbourhoods) states that people should have a good quality environment in active and supportive local community base on

lifetime neighbourhood principles. Developments should be designed so that the layout, tenure and mix of uses interface with surrounding land and improve people's access to social and community infrastructure and enable people to live healthy and active lives. The design of developments should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood.

- 3.22 Policy 7.2 (An Inclusive Environment) provides that the Mayor will require all new developments in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design.
- 3.23 Policy 7.4 (Local Character) states that development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.
- 3.24 The Council's Core Strategy Policy CS1(K) **[CDB.9]** requires a high standard of design and layout across all tenures within a development.
- 3.25 Policy DM1 (Achieving a High Standard of Development) of the Council's Development Management Policies Local Plan (2013) ("DMP") **[CDB.8]** requires all development to achieve a high standard of design, layout, privacy and amenity and sets out a range of design criteria which development proposals should have regard to. Proposals which fail to achieve a high standard of design and layout, or which are detrimental to local character and appearance, will be resisted.
- 3.26 Similarly, DMP Policy DM 2 (Lifetime Neighbourhoods) **[CDB.8]** requires developments to contribute to the creation of lifetime neighbourhoods through the design and layout of the development and any associated improvements to the public realm, transport and other infrastructure.
- 3.27 The design of the Regeneration Scheme meets national, regional and local policies. In its current form, the Estate lacks a coherent identity, predominately due to the dilapidated state of the older housing blocks and their position recessed from the highway; this is exacerbated by rudimentary landscaping to the front and rear. Moreover, the layout of the current estate facilitates antisocial behaviour due to the number of concealed areas and access points that fail to provide appropriate passive surveillance.

- 3.28 The design of the proposed development seeks to correct these defects, helping to rejuvenate the Estate and the wider area by providing high quality, prominent buildings that will engage at street level and create an attractive environment for residents.
- 3.29 The layout of the development proposals derives from the fundamental principle of re-aligning streets to create a consistent hierarchy of accommodation, public realm and open space to improve the function and legibility of the Estate and linkages both within the site and further afield.
- 3.30 A hierarchy of streets, footpaths, squares and gardens are proposed across the site to create a choice in moving into and through the site. The main “arteries” provide wide streets and footpaths, large trees and generous landscaping, whilst lesser routes will also benefit from trees and perennial landscaping proposals.
- 3.31 The Village Green has been positioned towards the centre of the site, adjacent to the replacement Community Centre in order to create a “community heart” to the Estate. The communal gardens will be located in the centre of the proposed residential blocks to enhance community cohesion and enable passive surveillance. The other blocks are spread throughout the site, all of which front onto other various gardens and landscaped areas.
- 3.32 The design of the proposals has been developed to reinforce local distinctiveness, in particular Harrow on the Hill, whilst integrating with the surrounding area. A fine grain approach has been adopted to increase permeability and legibility through the Estate, aspiring to emulate the most successful parts of South Harrow and London.
- 3.33 In order to establish a strong sense of place and local distinctiveness, the new Estate avoids the use of uniform type buildings that currently characterise parts of the site and instead, opts for buildings of varying scale, from traditional townhouses in the north to high density mansion blocks in the south. Inspiration has been taken from the nearby Harrow-on-the-Hill, utilising the distinct architectural vernacular of the area and applying a contemporary interpretation to the buildings and spaces on the Estate. Indeed, the buildings not only deliver a range of accommodation consistent with London Plan 2016 policy but also facilitates frequent shifts in architectural design, all of which are connected through differing roofscapes, facades and materials.
- 3.34 The scale of the proposals has sought to maximise density in the most appropriate and feasible places on the site and respect the height constraints imposed by the site’s location under the RAF Northolt flight path whilst sensitively considering the existing

dwelling surrounding the Estate. This has been achieved through the gradual increase in density from the two-storey townhouses in the north to the eleven-storey mansion blocks in the south west, reflecting the surrounding scale in South Harrow, whilst minimising the daylight and sunlight impacts on existing dwellings.

- 3.35 The Design Code submitted with the planning application established a number of mandatory design principles which must be adhered to at the reserved matters stage and acts as an aesthetic benchmark.

### **Housing Provision**

- 3.36 The Government's objective, as set out in the NPPF **[CDB.7]**, is to significantly boost the supply of housing. To this end, the NPPF advises 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.
- 3.37 In support of the Government's objective to boost the supply of housing, London Plan 2016 Policy 3.3 (Increasing Housing Supply) **[CDB.10]** seeks to ensure that London meets the challenges of population growth through the provision of sufficient new high quality dwellings. It targets an annual average of 42,389 new dwellings across London, with a target of 593 new dwellings per annum for the Council. The London Plan 2016 has been replaced by the recently adopted London Plan 2021 **[CDB.11]**. While the planning application for the Regeneration Scheme was assessed against the London Plan 2016 the London Plan 2021 identifies an increased housing need for 66,000 additional homes per year across London (**[CDB.11, para 4.1.1, (p 158) Chapter 4 – Housing]**) and sets a ten year target for the London Borough of Harrow of 8,020 net housing completions over the period 2019/20 – 2028/29 **[CDB.11, Table 4.1, p 163]**.
- 3.38 Policy 3.8 (Housing Choice) of the London Plan 2016 requires new developments to offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these.
- 3.39 London Plan 2016 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 schemes and that negotiations should take account of the circumstances of the scheme including development viability. The policy also establishes a clear expectation that 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.

- 3.40 The London Plan 2016 housing policies are supplemented by the Mayor's Housing SPG (2016). The SPG further emphasises the need for affordable housing policies to be applied in a manner that maximises output and, having regard to viability, to encourage not restrain housing development.
- 3.41 In terms of tenure split, the 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. 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.
- 3.42 The Council's Core Strategy Policy CS1(J) **[CDB.9]** sets a borough wide target of 40% of all dwellings delivered over the plan period to be affordable and calls for the maximum reasonable amount to be provided on individual development sites taking into account a number of factors including availability of subsidy, site circumstances and scheme requirements, development viability, etc.
- 3.43 DMP Policy DM 24 (Housing Mix) **[CDB.8]** seeks to ensure an appropriate housing mix, having regard to the overall borough targets and taking into account the location, character and need to optimise housing on previously developed land.
- 3.44 The Regeneration Scheme will deliver 574 new dwellings to replace the existing 282 dwellings. Of these, 300 dwellings will be for private sale and 274 will be affordable housing, representing 48% by unit number and 50% by habitable room, delivering different unit types and sizes that will make a significant contribution to the provision of new housing and help meet the Council's annual housing target.
- 3.45 The scheme will provide a varied mix of dwellings comprising flats, duplexes and townhouses, ranging between one and four bedrooms in size.
- 3.46 All the affordable housing will be provided on site in accordance with the London Plan 2016 and local plan policies. Additionally, 10% of the social rented dwellings will be provided to fully 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 dwellings are capable of being adapted to full wheelchair standard.

- 3.47 It is therefore considered that the residential mix meets the requirements of both current and future residents of the Estate and accords with Policy 3.8 of the London Plan 2016 and DMP Policy DM24 **[CDB.8]**.
- 3.48 Further details on the type, mix, tenure and sizes of the dwellings being provided are set out in the Planning Statement and the Affordable Housing Statement **[CDB.12]** submitted with the planning application and the officer report to planning committee.

### **Community Facility**

- 3.49 London Plan 2016 Policy 3.16 (Protection and Enhancement of Social Infrastructure Facilities) 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.
- 3.50 DMP Policy DM46 (New Community, Sport and Educational Facilities) **[CDB.8]** supports the provision of new community facilities in areas of good transport accessibility.
- 3.51 The Regeneration Scheme will provide a replacement community centre for the one that is currently located on site. The existing community facility on the Estate is small in footprint and has an awkward layout which prevents it being used as efficiently and effectively as it could be.
- 3.52 The proposed replacement community facility would be a multi-functional building. It will be positioned towards the centre of the site and at the heart of the community, adjacent to the proposed Village Green and will be three storeys in height. It will be designed to be flexible and accommodate a range of uses but will have regular use by community groups, nursery, estate and wider residents.

### **Play Space**

- 3.53 Policy 3.6 (Children and Young People's Play and Informal Recreation Facilities) of the London Plan 2016 states that all children and young people should have "*safe access to good quality, well designed, secure and stimulating play and informal recreation provision.*" The policy notes that new development should make provision for play based on the expected child population created by the development and makes further

reference to the Mayor's "Providing for Children and Young People's Play and Informal Recreation" SPG's recommendations and calculations.

- 3.54 DMP Policy DM 28 (Children and Young People's Play Facilities) **[CDB.8]** sets out the requirement to provide sufficient child play space on site for those developments that result in a net increase in child yield.
- 3.55 The existing designated play space on the Estate consists of dated equipment that is not designed to cater for all age groups. The Regeneration Scheme would address this 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.
- 3.56 Applying the child yields, it is calculated that the development would yield a total of 153 0 – 4 years old, and 131 other age groups. The Council requires 4sqm per child; consequently, based on the above yields, a total of 1,136sqm play space is required to be provided. By contrast, when calculated against the London Plan 2016 policies, the child yield for the Regeneration Scheme would be 120 0 – 5 year olds and 114 other ages groups which would require a total play space of 2,340sqm.
- 3.57 The proposed Regeneration Scheme 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 requirements of the GLA (who require 10sqm per child) and the Council. The scheme also includes 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.
- 3.58 The submitted site-wide play space strategy is considered to be acceptable and conditions have been attached to the planning permission to ensure that the 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 are delivered.

### **Open Space**

- 3.59 Policy 7.18 (Protecting Open Space and Addressing Deficiency) of the London Plan 2016 **[CDB.10]** seeks to resist the loss of open space unless equivalent or better quality provision is made within the local catchment area.

- 3.60 Policy CS1.F of the Core Strategy **[CDB.9]** seeks among other things to protect the quantity and quality of open spaces from being eroded by inappropriate uses or insensitive development.
- 3.61 DMP Policy DM 18 (Protection of Open Space) **[CDB.8]** applies to a broad range of open space irrespective of ownership or accessibility (see paragraph 5.23 of the supporting text). It applied to the existing amenity space for the residents of the estate. The policy sets out a presumption against the release of open space for development. However, the policy allows for the reconfiguration of open space if:
- the reconfiguration is part of a comprehensive, deliverable scheme
  - there would be no net loss of open space
  - the reconfiguration would achieve enhancements to address identified deficiencies in the capacity, quality and accessibility of open space, and it would secure a viable future for the open space
  - the reconfiguration would not be detrimental to any environmental function performed by the existing open space
- 3.62 DMP Policy DM 19 (Provision of New Open Space) **[CDB.8]** states that proposals for major new residential development will be supported where they make provision for new open space, or enhancements to existing open space, which meets the needs of the occupiers of the development and contributes to the mitigation of identified deficiencies in the quantity, quality and accessibility of open space. Regard will be had to the Council's local recommended standards of provision for all relevant typologies of open space.
- 3.63 Parts of the application site comprise open space for the residents of the Estate which is designated under DM 19. However, the existing open space is of a very poor quality and the open space that is located around the existing dwellings does not provide a satisfactory level of usability and functionality for the existing occupiers.
- 3.64 The Regeneration Scheme results in a reconfiguration of the site with an overall net loss of open space. Currently, the Estate has an overall area of 14,829sqm, which is made up of 14,444sqm of amenity space and 385sqm of play space. However, the open space across the site which is available for amenity space is of a poor quality and due to its relationship to the housing stock, there is a lack of definition and

ownership of the open space. As such, the existing open space set aside for amenity space is underutilised.

- 3.65 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 London Plan 2016 **[CDB.10]**, the Core Strategy (2012) **[CDB.9]** and Policy DM18 (Protection of Open Space) of the DMP **[CDB.8]**, it is considered that the qualitative benefits of providing multifunctional and attractive open space far outweighs the loss. Further, the reduction in the quantum of public open space being provided reflects reutilisation of these areas to create private amenity space. This is provided throughout the scheme in the form of private and communal gardens.
- 3.66 Lastly, the comprehensive landscape strategy proposed for the Regeneration Scheme would ensure the viable future of the open space which will be a vast difference from the non-descript and undefined open space currently on site.
- 3.67 The above planning policy considerations provide an overview of how the Regeneration Scheme accords with key national, regional and local policy objectives.
- 3.68 A full assessment of the Regeneration Scheme against all the relevant planning policies can be found in the officer report **[CDB.2.1-2.2]** to planning committee and the planning documents submitted with the planning application.
- 3.69 The removal of the Ministry for Defence/Air Cadets land from the development site would result in the approved enhanced pedestrian access from Northolt Road no longer being delivered, and the Air Cadets building remaining in situ (maintaining the existing access from the site to Northolt Road). Notwithstanding, the principle of the development still being delivered would continue to be acceptable.

## **4 DELIVERY**

- 4.1 As previously indicated, the delivery of Phases 2 and 3 of the Regeneration Scheme will be through a phased programme of demolition and redevelopment. Details of the delivery are addressed in the evidence of other Council witnesses.

## **5. BENEFITS**

- 5.1 The Council is committed to securing the regeneration of the Estate of which the Order Land forms a part. The need for the physical renewal and comprehensive

redevelopment of the Estate is identified within the Harrow Core Strategy Core Policy CS3(J) **[CDB.9]**.

- 5.2 The Regeneration Scheme is part of the Council's ambition for "Building a Better Harrow" which is increasing the supply of housing in the borough. This includes looking at building new dwellings on council estates where there is suitable land and redeveloping some estates to provide more and better quality dwellings.
- 5.3 The existing housing stock on the Estate is an experimental "Resiform" type of housing that has gone well past its anticipated life of circa 30 years. The building stock is of a poor quality and 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.
- 5.4 The comprehensive regeneration of the Order Land and the Estate would deliver the aspirations of the Council and include the following key regeneration benefits:
- demolition of the existing, unsatisfactory Resiform flats that provide a poor quality and not fit for purpose substandard accommodation for existing residents and their replacement with 574 modern high quality dwellings;
  - an increase in affordable tenure floorspace across the Estate of a much higher quality which strengthens and reinvigorates the surrounding area;
  - provision of a net gain in housing stock of 292 units, contributing towards the borough's wider housing needs;
  - provision of a better mix of affordable housing units and 300 private units for sale while providing a significant boost to the economy and local environment of South Harrow;
  - provision of a better quality of residential amenity for residents whilst not unacceptably harming the amenity of neighbouring occupiers;
  - demolition of the poor quality community centre currently located on the Estate and its replacement with a larger, modern, multi-purpose facility that serves the needs of residents of the Estate and the wider community;
  - creation of clearly-defined, usable and high-quality open spaces for both public and communal use; and

- creation of apprenticeships, jobs and training opportunities to help those most in need, especially the young.

**Summary comparison of accommodation existing and proposed:**

GRANGE FARM EXISTING AND PROPOSED ACCOMMODATION ALL PHASES					
	Existing Estate	Affordable - breakdown		Proposed Affordable Total (Rent + S.O.)	Proposed Private Total (Market sale)
Total No. of Homes	253 (282-29 leaseholders)	216 + 33 = 249 (Rented)	25 (S.O.)	274	300
Total No. of Bed spaces	822	758 + 118 = 876 (Rented)	74 (S.O.)	950	971
<b>Total NIA</b>	<b>15,672 sqm</b>	<b>18,215 sqm</b>	<b>1,514 sqm</b>	<b>19,729 sqm</b>	<b>2,1552 sqm</b>

## 6 OBJECTIONS

- 6.1 The consultation responses (including objections) to the planning application and the Council's comments on these are set out at section 4 (Consultation) of the officer report and addendum to the planning committee meeting of 21 March 2018 **[CDB.2.1 – 2.2]**.

## 7 SUMMARY AND CONCLUSIONS

- 7.1 In my view, the planning reasons for bringing the scheme forward are sound and the benefits to the residents would be considerable.

## 8 STATEMENT OF TRUTH

The evidence which I have prepared and provide for this Inquiry ref. APP/PCU/CPOP/M5450/3260423 is to the best of my knowledge true and I confirm that the opinions expressed herein are my true and professional opinions.

Callum Sayers

14 June 2021

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