



45 Welbeck Street
London W1G 8DZ
020 3409 7755
info@hghconsulting.com
hghconsulting.com

Nicola Rankin
Principal Planning Officer
LB Harrow
Civic Centre
Station Road
Harrow, HA1 2XF

Email: nicola.rankin@harrow.gov.uk

28th January 2021

Dear Nicola,

**Former Brockley Hill Golf Centre, Brockley Hill, Stanmore (P/3088/20)
Revised Red Line Application – Submission of Amendments to the Scheme**

Further to your email dated 3rd December 2020 confirming the validity of the above planning application, having been aware of our intention to reduce the planning application site area from our prior correspondence in October, including my email to you dated 22nd October attaching an indicative amended site plan, and address amendments to the scheme to respond to statutory consultee comments, we formally submit herewith revisions to the scheme.

The revised application site area is wholly contained within the original application boundary on land owned by the applicant, Sairam Holdings Ltd, and by Sairam (Watford Op) Ltd, being the same ownership / interested parties as advised in the amended application and notices submitted to LB Harrow on 25th September 2020.

Proposed Scheme Amendments

Firstly, it is important to note that there are **no changes** to the principal elements of the original planning application scheme in respect of:

- **Siting:** The siting of the proposed building
- **Metrics:** The footprint, floorarea, scale, height of the proposed building
- **Access:** The proposed access on Brockley Hill
- **Parking:** The layout and number of staff and visitor car parking

The amendments to the planning application relate to:

- **Site Area:** Reduced application site area / boundary (1.63ha).
- **SUDS Pond:** Relocated SUDS pond and drainage routes (shape amended, capacity unchanged). No net loss of trees (2 retained and 2 removed – no ecological implications).
- **Secret Garden:** Marginal re-siting to accord with SUDS pond relocation.

- **Processional Route:** Reduced processional footway (from the northernmost part of the site – to address practicality, distance and gradient difficulties) and a re-sited memory point (ornamental pergola).
- **Design:** alterations to the western and southern elevations of the banqueting building, with the removal of the wrap around balcony for two separate balconies on south and west elevations to reinforce barn-style appearance and simplification of materials range and use of alternative perforated materials.
- **Bio-Diversity Net Gain:** an overall enhanced net gain under the revised scheme, which exceeds the minimum 10% proposed in the Environment Bill (Royal Assent further delayed) and Harrow’s net gain target of 20%:
 - Original net gain: +20.98% habitat units and +10.58% hedgerow units
 - Revised net gain: +20.02% habitat units and +49.55% hedgerow units
- **Security:** replacement gates at the site entrance in response to Secure by Design Officer comments/meeting (October 2020).
- **Drainage:** further drainage modelling, CCTV surveys, assessment of residual risks and flood resilience following site visit and consultation with the Council’s Drainage officer. Drainage Consent Order has been prepared and will shortly be submitted.
- **Cycle Parking:** 17No additional short stay covered cycle parking spaces.
- **Energy / Sustainability:**
 - **BREEAM** – the revised scheme results in no change to the ‘Excellent’ rating
 - **Overheating** - all occupied rooms meet CIBSE Guide A requirements for thermal comfort in buildings with active cooling
 - **Energy** - CO2 emissions of the amended scheme have been calculated using the SAP 10.0 carbon emission factors and achieves the same results:
 - On-site CO2 reduction of **56.3%** beyond Building Regulations through energy efficiency measures and maximise renewable technologies (21.3% ‘Be Lean’ and 34.9% ‘Be Green’ - Air Source Heat Pumps & PVs)
 - Carbon offset payment cost has been calculated as **£44,633**
 - **District Heating Network** - There are no existing or potential networks within the vicinity of the scheme as per the London Heat Map. Moreover, the London Borough of Harrow has also been consulted to identify potential local heat network connection opportunities. The London Borough of Harrow has confirmed that there are no existing heat networks within the immediate vicinity of the site that would be likely to be capable of feasibly serving the subject development.
- **Openness:** verified visualisation assessment has been prepared of the site access amendments (gates, planting and new hedgerow) to illustrate ‘Day 1’ of the development and ‘Year 15’ to reinforce the preservation of the openness of the Green Belt, and

- **Overflow Parking:** in response to comments from the GLA, Harrow and Barnet Highways, the applicant has sought legal advice on the ability and appropriateness of a s106 legal agreement to secure off-site overflow parking for larger events and how this could be enforced by the Council.

A s106 agreement which secures an obligation to comply with a defined “scheme” as opposed to securing a specific identified location (within/outside of the Borough) would meet the Regulation 122 tests.

For example, an agreement that secures a ‘park and ride’ facility in one Authority for the benefit of a town centre in another Authority, or ecological contributions from a development in one Authority area benefiting enhancement / mitigation works in another Authority area.

In this case, the applicant would enter into a s106 obligation to submit details for an “Overflow Parking Scheme” to be agreed with Harrow Council prior to first occupation of the development. The development would then have to be operated in accordance with this scheme. It would set out the trigger point where the Overflow Parking Scheme would be activated, provide details of the location of the overflow parking provision and how the scheme would operate including arrangements for shuttle buses and its management. The applicant is exploring a number of alternative locations that could accommodate overflow car parking, one of which could include The Manor Hotel, Barnet Lane in Elstree, which is also owned and operated by the applicant.

The size of the event and the number of parking spaces required, and coaches, will be recorded as part of the Travel Plan obligations by the banqueting facilities management team at the point of booking the event. The Management will then plan for the level of parking and the use of the overflow parking location (if required depending on the size of the event) in association with the host(s) prior to the event and be actively marshalled by parking staff on the day.

- **Fire Statement:** in response to the request by the GLA, a fire strategy has been commissioned and will be submitted shortly in support of the scheme.
- **Noise / Agent of change:** in response to comments made by the GLA the applicant will seek to agree a suitably worded noise condition
- **Alternative Site Assessment:** an alternative site search assessment has been carried out for the whole Borough of Harrow, based upon an agreed set of location and physical specific criteria, including additional available commercial sites provided by the Council. In response to further requests to widen the search and assess locations beyond LB Harrow a number of main town centres in LB Barnet, LB Brent and Hertsmere have been identified. A supplemental site assessment report has been prepared in support of the scheme.

In the context of a valid current planning application, the payment of the PPA fee (final draft version to be submitted to reflect amended red line and updated timelines), re-consultation on the amendments, which do not give rise to any additional material harm compared with the original scheme, and no changes to the main built form, site access and parking provision, in the interests of flexibility and fairness the Council can accept the revisions to the planning application.

Next Stage – Public Consultation

The proposed amendments to the scheme within the reduced red line boundary results in beneficial enhancements of the scheme. For example, in the level of biodiversity net gain (hedgerow units), design quality and landscape enhancement in the vicinity of the proposed building.



The applicant fully expects and accepts that the Council will undertake a 21-day re-consultation of the revisions to the proposals and updated technical assessment to allow all interested parties a fair and reasonable time to consider the amendments to the scheme.

Amended Application Documentation

The revisions to the application scheme are set out in a series of amended drawings and supplemental statements, which should be substituted for those submitted at the time of the original application submission. The attached table summarises the submitted revised documentation.

Extension of Time

The applicant is in agreement to a further extension of time for the determination of the application, to allow for formal public re-consultation and for the GLA to further consider the amendments to the scheme, ahead of determination of the application.

An extension of time to **30th March 2021** is acceptable to the applicant. Should officers consider a further extension of time is required then the applicant will consider this and happy to discuss again to agree a mutually suitable date to reflect the forthcoming committee cycle dates and purdah period.

Thank you for your continued attention and assistance with this application.

Yours sincerely

A handwritten signature in blue ink, consisting of a stylized 'RH' followed by a long horizontal line.

Richard Henley MRTPI
hgh consulting

Encs.

Cc Orla Murphy (Head of Development Management)

Appendix 1: Planning Application Documents

Application Document submitted August 2020	To be Substituted, Supplementary Document or no Revision (January 2021)	Comment
Existing Site Plans, Floor Plans, Elevation and Section Drawings	No Revision	
Proposed Site Plans, Floor Plans, Elevation and Section Drawings	Substituted	Revised to reflect scheme amendments.
Design and Access Statement	Supplementary	Describes the amendments to the scheme and includes revised plans and drawings. To be read with original DAS.
Planning Statement	Supplementary	Addresses scheme amendments and responds to comments from statutory consultees. To be read with original PS.
Landscape and Visual Appraisal	Substituted	Revised to reflect scheme amendments. No change to conclusions.
Landscape Strategy Plan	Substituted	Revised to reflect scheme amendments Plan ref: 13201/P11d.
Arboricultural Report	Substituted	Revised in response to January 2021 Tree Survey and scheme amendments.
Tree Protection Plan	Substituted	Revised in response to January 2021 Tree Survey and scheme amendments. Ref: TPP/BHGCBHS/010 Rev B.
Ecological Assessment and Biodiversity Net Gain Metric	Substituted	Revised to reflect scheme amendments and to incorporate results of Reptile Survey. No change to conclusions.
Archaeological Desk Based Assessment	Substituted	Revised to update plans only. No change to conclusions.
Transport Assessment	Substituted	Revised in response to comments from the GLA, Harrow and Barnet Highways. No change to conclusions.
Travel Plan and Car Park Management Plan	No revision	
Delivery and Servicing Plan	No revision	
Outline Construction Logistics Plan / Construction Traffic Management Plan	No revision	
ATZ Healthy Streets Photo Assessment	No revision	
Flood Risk Assessment and Drainage Strategy	Substituted	Revised to reflect scheme amendments and following on-site meeting and consultation with the Council's Drainage Officer. No change to conclusions.
BREEAM Pre-Assessment	Substituted	Reviewed to acknowledge scheme amendments. No change to content of Assessment
Energy Assessment	Substituted	Revised in response to comments from the GLA. No change to conclusions.
-	GLA Carbon Emissions Reporting Spreadsheet	New document following request from GLA
Overheating Analysis	Substituted	Reviewed to acknowledge scheme amendments. No change to document

Life Cycle Assessment	Substituted	Reviewed to acknowledge scheme amendments. No change to document.
Noise Impact Assessment	Substituted	Revised to update plans. No change to conclusions.