

Supplementary Planning Statement
Brockley Hill, Stanmore – New
Banqueting Facility

Relating to site at
Former Stanmore and Edgware Golf Centre
January 2021



hghconsulting.com



Contents

- 1.0 Introduction 3
- 2.0 Description of Scheme Amendments..... 6
- 3.0 Planning Policy Update 9
- 4.0 Update to Planning Considerations 10
- 5.0 Summary and conclusion 24

Appendices

- 1. List of planning application documents
- 2. Email from Energy Officer at Harrow Council
- 3. Email from GLA Case Officer

1.0 Introduction

- 1.1 This Supplementary Planning Statement has been prepared by hgh Consulting on behalf of Sairam (Holdings) Ltd to supplement the Planning Statement (August 2020) that was submitted to the London Borough of Harrow (LBH) in support of a planning application (ref: P/3088/20) at the former Stanmore and Edgware Golf Centre, Brockley Hill, Stanmore, HA7 4LR, for the following development:

“Demolition of existing golf club buildings (Use Class D2) and construction of a new banqueting facility (Use Class D2), widening of the existing vehicular access from Brockley Hill, car and cycle parking, waste / recycling storage, landscape enhancements and associated works”

- 1.2 The purpose of the statement is to address the minor amendments that have been made to the scheme as a result of a change to the site area and in response to comments made by statutory consultees to date. It describes the minor amendments to the scheme proposals and provides an assessment of the amended scheme against the development plan and material considerations. A response to comments from statutory consultees is also provided.

Background

- 1.3 A planning application for the proposed development was submitted on 27th August 2020 and found to be valid on 1 September 2020. The application has been subject to the statutory 21 day consultation period and comments from the following statutory consultees have been received to date: LBH (Design, Highways, Drainage); the GLA; London Borough of Barnet (including Barnet Highways); and the Secure by Design Officer.
- 1.4 The site area as submitted comprised of land containing the former club housing building, putting green, car park, entrance part of the driving range to the north of the club house. There is now a requirement to amend site area and the revised red line boundary is shown in Figure 1. The planning application site area is 1.63 hectares.
- 1.5 The revised application site area is wholly contained within the original planning 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 LBH on 25th September 2020.

- 1.8 There is no change to the key principles of the scheme as set out in paragraph 1.7 of the Planning Statement.

Need for EIA

- 1.9 The LBH issued a formal EIA Screening Opinion on 10th September 2020 where they confirmed that they considered that *“the proposed development is not likely to have significant effects on the environment and therefore does not comprise EIA development”*.

- 1.10 The amendments to the scheme result in no change to: the footprint, floorspace, volume and maximum capacity of the proposed banqueting facility; the proposed widening of the existing junction on Brockley Hill; and the proposed layout and number of car parking spaces from the scheme that was submitted in August 2020. As demonstrated in this statement, it is considered that the minor amendments to the scheme will not give rise to significant effects on the environment taking account of the characteristics of the development, its location, and the potential impacts.

Structure of Statement

- 1.11 The statement is structured as follows:

Section 2 provides a summary of the scheme amendments;

Section 3 provides a planning policy update;

Section 4 updates the planning considerations section of the Planning Statement; and

Section 5 draws out conclusions in respect of the amendments to the proposals.

2.0 Description of Scheme Amendments

2.1 This section of the statement describes the changes made to the scheme and to the design of the building as a result of the change to the site area / planning application boundary and consultation responses from statutory consultees. Further details are provided in the Supplementary DAS.

Changes to scheme

2.2 The change in site area has resulted in some minor amendments to scheme. Figure 2 below shows the submitted scheme and Figure 3 the revised scheme. The changes are as follows:

- Re-siting of the SUDS pond. No change in volume.
- Re-siting of the secret garden.
- Retention of the willow trees to the south of the secret garden area.
- Revision to the pagoda and path to increase accessibility for guests.
- Re-routing of drainage ditch to reflect re-sited SUDS pond.
- 17 short stay cycle parking in the car park.
- Main entrance vehicle gate in response to comments from the Secure by Design Officer.
- The removal of one small tree in the secret garden area and another small tree adjacent to the secret garden area, both of which are poor Category C trees.

2.3 There are no changes to: the siting or footprint of the proposed building; site entrance; car park area and layout; formal landscaped areas and the scheme concept.

2.4 The fencing and netting associated with the driving range outside of the red line planning application boundary has now been removed.



Figure 2: Proposed Site Plan (submitted August 2020) (above).
Figure 3 (Amended Site Plan) (January 2020) (below)

Amendments to the design of the proposed building

2.5 In response to the comments from the Council's design officer there have been some minor external design changes to the south and west elevations of the proposed building. Further detail is provided in the Supplementary DAS however the main changes can be summarised as follows:

- The projective box element on the south elevation has been simplified with the introduction of a wall to close off the gable end of the Front of House building, reinforcing the barn typology.
- The wraparound balcony has been split into two separate balconies on the west and south elevations.
- The laser cut material for the balconies and external staircase has been reduced in its extent.

2.6 The proposed changes to the south and west elevations are shown in Figures 4 and 5 below.



Figure 4: Revised South Elevation showing the separate balcony



Figure 5: Revised West Elevation showing the introduction of a wall to close off the gable end to reinforce the barn typology, separate balcony and amended materials for balconies and external staircase

Summary

2.7 The above demonstrates that the proposed amendments to scheme and detailed design of the south and west elevations are minor and are refinements to the scheme proposals as submitted.

3.0 Planning Policy Update

3.1 Since the planning application was submitted the Mayor of London has published the '*Publication London Plan*' (December 2020). This is following comments from the Secretary of State on the '*Intend to Publish*' version of the plan (December 2019). The Secretary of State has six weeks to decide whether he is content for the Mayor to publish the final version of the plan.

3.2 The only amendment made by the Secretary of State to a policy relevant to these proposals (as listed in section 5.0 of the Planning Statement) is in relation to Policy G2: London's Green Belt. Part A 2 now reads:

"The Green Belt should be protected from inappropriate development:

2) subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported"

3.3 This further re-enforces the conclusions in the section that deals with Green Belt in the Planning Statement.

4.0 Update to Planning Considerations

4.1 This section assesses the amended scheme against the development plan and other material considerations. It also provides a response to comments made by statutory consultees.

1. Principle of the Proposed Development

4.2 There is no change to the description of the proposed development, footprint, floorspace, volume and proposed capacity of the building, site entrance, number of car parking spaces and landscape strategy.

Sequential Site Assessment

4.3 In accordance with LBH policy DM35, policies in the LP and draft LP and paragraph 86 of the NPPF, a Sequential Site Assessment (SSA) was undertaken and submitted with the planning application to identify whether there are any suitable and available alternative in-centre or edge of centre sites in the Borough of Harrow that could accommodate the proposed development. The SSA demonstrates that there are no suitable or available in-centre or edge-of-centre sites for the proposed banqueting facility.

4.4 Officers at the LBH advised shortly before the submission of the application that the site size criteria for assessing sites in the SSA should also include sites that could accommodate the required floorspace on a single floor (noting that the existing facility has a floorspace of 1,358sqm) and car parking or access to car parking nearby.

4.5 A Supplementary Sequential Site Assessment (September 2020) was prepared that assessed sites occupied by a building with a minimum floorspace of 1,000sqm on a single floor and that also had a car park or was within 250m of a car park with capacity for 50 - 100 car parking spaces. The SSA concludes that there are no alternative suitable or available sites for the proposed development in a town centre or edge of centre locations within the Borough of Harrow.

4.6 On 3rd December 2020, officers confirmed that the assessment of sites within Harrow is '*reasonably through*' but requested that a list of current vacant sites in Harrow was also reviewed. Officers also considered that other sites outside of the borough should be assessed including town centre sites in Brent and Barnet and that a justification for the rationale for the search area should also be submitted.

4.7 The applicant has considered this request and a second Supplementary Sequential Site Assessment (January 2020) is currently in preparation. This assessment will review sites with a PTAL of 5 or 6 and will include the following centres:

- Edgware (LB Barnet)
- Colindale (LB Barnet)
- Wembley (LB Brent)
- Northolt (LB Hillingdon)
- Ruislip/Eastcote (LB Hillingdon)
- Borehamwood (Hertsmere)

- 4.8 The assessment criteria has been the same as with the assessment that has been undertaken for sites in Harrow i.e. sites with 1,000 sqm of floorspace on a single floor with access to off-site parking facilities for between 50-100 spaces within a 250m radius (being the limit that a guest of the banqueting facility may be prepared to walk in wedding attire and/or poor weather).
- 4.9 The second Supplementary Sequential Site Assessment is submitted in support of the revisions to the planning application.
- 4.10 The list of current vacant sites in Harrow provided by officers has also been reviewed and is appended to the second Supplementary Site Assessment. This re-confirms that there are no alternative suitable and available sites within Harrow that can accommodate the proposed development.
- 4.11 The proposed scheme amendments and design changes to the building alone do not alter the conclusions in the Planning Statement that the principle of the proposed development is considered to be acceptable. Furthermore, the GLA Stage 1 Report similarly advises that the proposal may be supported in principle, subject to the matters in the report being addressed.

2. Green Belt

Scheme amendments

- 4.12 The proposed amendments to the south and west elevations of the building comprise only minor changes to the gable end on the west elevation, the separation of the wraparound balcony into single balconies on each elevation and the simplification of materials.
- 4.13 The amendments to the design of the proposed building do not result in any changes to the siting, footprint, floorspace, volume or height of the building. Table 1 on page 38 of the Planning Statement that contains a comparison of the footprint, floorspace, volume and height of the former golf clubhouse and the proposed banqueting facility does not change.
- 4.14 Likewise there is no change to the areas of proposed hardstanding. Tables 2 and 3 in the Planning Statement that compare existing and proposed hardstanding do not change and are still applicable.
- 4.15 The fencing and netting associated with the driving range outside of the amended site boundary has been removed by the applicant thereby improving the openness of the wider site in the Green Belt.

Comments from the Council's Urban Design Officer

- 4.16 The Urban Design Officer concurs with the view of the applicant that the proposals result in no additional detrimental impact to the green belt character of the area:

“Massing has been revised as per Design Review Panel comments and the scale of the building is appropriate and comfortable. While there is a minimal increase in footprint over the current building, there is no additional detrimental impact to the green belt character of the area due to successful view appraisals and massing strategy. It is noted that the height of the proposed building is less than that of the existing.”

GLA Stage 1 Report

- 4.17 The GLA Stage 1 Report assessed the impact of the proposed form of the building on the openness of the Green Belt.

- 4.18 The GLA agree with the findings in the LVA that the site is entirely screened by mature vegetation when viewed from Stanmore Country Park, west of the site and from Augustus Close and the residential development south of the site (paragraph 24). The proposal would maintain the mature planting which screens the site from view and as the proposed building is 0.4m shorter than the existing building it would not breach the treeline. For these reasons the report concludes that “*existing level of openness from these vantage points would be preserved*” (paragraph 25).
- 4.19 The report agrees that the existing building is prominent when viewed from within the site, particularly when viewed from the south and the existing netting appears prominently when viewed from the northern side of the site (paragraph 28). It considers that:
- “as the proposed building is shorter and more laterally compact than the existing building and the proposal includes removal of the existing netting it is anticipated that the development would allow for better North-South views from within the site thereby enhancing the perceived openness from these vantage points”* (paragraph 29).
- 4.20 The GLA state in paragraph 30 that: “*where ‘Agent of Change’ and ‘Transport’ issues are robustly addressed, the proposed changed nature of activities at the site would not result in a net additional impact on the openness of the Green Belt*”.
- 4.21 The report notes the changes to the site entrance on Brockley Hill and suggests that based on the information submitted it is not yet clear how these changes would impact the openness of the Green Belt from the vantage points along Brockley Hill, particularly the balance of greenery to built form (paragraph 26). The report requests the applicant to provide visualisations to demonstrate the proposals impact on openness from the site entrance (paragraph 27).
- 4.22 The GLA report concludes that:
- “the proposal could reasonably be considered under exceptions test (g); however, more information is necessary to demonstrate that the openness of the Green Belt would not be harmed.”*
- 4.23 A verified visualisation assessment of the site entrance from Brockley Hill has been prepared in response to the GLA comments (Photo Viewpoint 1 in the LVA - pre the fire at the golf centre building, on completion of the development (Day 1) and 15 years post completion) to reinforce the preservation of the openness of the Green Belt.

Summary

- 4.24 The proposed scheme amendments and the visualisations result in no change to the conclusions in the Planning Statement in respect of the impact of the proposed development on the openness of the green belt. The proposal is in accordance with paragraphs 134 and 145 of the NPPF, LBH policies CS (F) and DM 16 and LP policy 7.16.

3. Design

- 4.25 There is no change to the siting, layout, footprint, floorspace massing, bulk, scale or height of the proposed building from the submitted scheme.

- 4.26 The change to the site area has resulted in very minor changes to the overall scheme with the re-siting of the SUDs pond and secret garden; revision to the pagoda and path; and re-routing part of the drainage ditch. This space will still make best use of this aspect, integrate the building into the landscape and maintain the processional route from the car park through the building and out into the wider landscape.

Comments from the Council's Urban Design Officer

- 4.27 The comments from the Urban Design Officer in respect of the proposals are generally very positive especially in terms of the massing, scale, built form, internal layout, aspect and orientation and sustainability and environmental considerations of the proposed building.
- 4.28 The Design Officer made comments in relation to the architectural form, composition and materiality of the building. These were mostly in relation to the south west corner of the building as follows:
- The corner eave glazing to the southern elevation and wraparound balcony that dilutes the barn typology. Revision of the balcony is encouraged.
 - The southern elevation that appears cluttered. Rationalisation is strongly encouraged.
 - The proposed laser cut metal panels
 - The Banqueting Hall elevations which do not fully integrate with the other venue buildings. Lighter facades, with a more pleasing rhythm should be considered.
- 4.29 The architects have responded to these comments and made some minor amendments to the external appearance of the south and west elevations of the building, full details of which are contained in the Supplementary DAS.
- 4.30 Amendments have been made to the western elevation of the front of house building to close off the gable end to reinforce the barn typology (Figure 6). The wrap around balcony has been split into two separate balconies on the south and west elevations. This helps to define separate uses, with the balcony on the south elevation being about views and celebration and the balcony on the west elevation about movement and means of escape.



Figure 6: Revised west elevation

- 4.31 The extent of the proposed laser cut material has been reduced and simplified in response to the comment from the officer that the proposed detail appeared to be incongruous with the remaining external material pallet and may date quickly.

- 4.32 The southern elevation has been simplified and the projecting balcony has been rationalised (Figure 7). The architects have explored the use of other perforated materials for the spiral staircase on the western elevation and the balustrade.



Figure 7: Revised south elevation

- 4.33 In response to the banqueting hall elevations, they are themselves symmetrical. The glazing wraps around the corner and the fins provide some shading to the hall itself. The architects have graphically emphasised the north facing banqueting hall elevation to ensure that it reads that the Front of House building is set back and therefore in a different plane (Figure 8).



Figure 8: North elevation (no change to scheme design, graphic amendment to the elevation)

- 4.34 There are no changes to the proposed east elevation.
- 4.35 The amendments to the south west corner of the building are minor refinements to the overall concept design.

Comments from the Secure by Design Officer

- 4.36 The Secure By Design Officer has recommended that security measures are integrated into the design of the proposals given the historic and recent use of the site where anti-social behaviour has taken place in the car park and fly tipping on the wider site.

- 4.37 5Plus have discussed the proposals and potential security measures with the Design Out Crime Officer of the Metropolitan Police Service on 19th October 2020 including a secure replacement gate to the site entrance and secure ground floor openings as shown on page 16 of the Supplementary DAS. The applicants own security requirements will be discussed and included at the more detailed design stage and can be secured by a planning condition.

GLA Stage 1 Report

- 4.38 Comments from the GLA's Urban Design Officer (paragraphs 36 and 37) are positive with the officer commenting that the layout makes efficient use of the previously developed land and the proposed buildings benefitting from a coherent overall look and feel.
- 4.39 A Fire Statement prepared by a suitably qualified assessor demonstrating how the proposed development would achieve the highest standards of fire safety including details of construction methods and materials, means of escape, fire safety features, and means of access for fire service personnel has been requested. A Fire Strategy is currently being prepared and will be submitted under separate cover.
- 4.40 The GLA requested additional information regarding the accessibility of the grounds for all users. Details are provided on page 17 of the Supplementary DAS.
- 4.41 Level access will be provided between the reception area at ground floor level and the Secret Garden area. The landscaped gardens will be laid level as much as the existing site topography and change in level from north to south allow. An accessible lift is proposed to provide less ambulant visitors access to the first floor. The landscape has been designed to include access on paths and along the processional route from the site entry point to the pagoda. The path will be suitable for wheelchair uses, albeit will follow the existing undulation of the landscape.

Summary

- 4.42 The minor amendments to the design of the south west corner of the building in response to the comments from the Council's Design Officer do not change the overall concept of the building design, but enhance the architecture by refining the design of the south and west corner of the building to better recreate the barn typology.
- 4.43 The amendments do not change the assessment of the scheme design in the Planning Statement and the conclusions are still valid. The proposed development provides a high quality design which has responded to the semi-rural Green Belt setting and landscape character and integrates well with the landscape and retains natural features. The massing, bulk, scale and height of the building has been kept to a minimum within the Green Belt setting. The overall design will achieve inviting indoor and outdoor environments.
- 4.44 The proposals are therefore compliant with design policies at all levels including LBH policies CS1(B) and DM1, LP policies 5.3, 7.2, 7.4 and 7.6 and LPITP policies D3, D4 and D5.

4. Landscape and Visual Impact

- 4.45 The Landscape Strategy Plan (extract at Figure 9) has been updated to reflect the scheme amendments. There is no change to the overall landscape strategy which has been an integral part of the design process to incorporate green infrastructure into the overall design from the start of the process.
- 4.46 The scheme includes hard and soft landscaping that is appropriate to the character of the area. This includes: the retention of boundary planting along Brockley Hill, additional tree planting across part of the southern boundary of the site characteristic of the LCA, proposed mounding, landscape, wildflower meadow and tree planting to the north of the building to integrate the building into the landscape; retention of the trees and hedgerows within the car park; new hedgerows at the site entrance; proposed SUDS pond utilising the existing ditch and providing biodiversity enhancement. The additional tree planting and soft landscaping continues to achieve a suitable visual setting for the building and supports biodiversity.



Figure 9: Extract from Landscape Strategy Plan

- 4.47 As a result of the comments from the GLA regarding accessibility around the site and the scheme amendments, there has been a revision to the pagoda and path. This will increase accessibility for guests, providing a more sensible area for photographs and celebration that does not involve the bridal party and guests to walk up the hill in their finery and will not prohibit those guests who are less mobile from joining in the celebrations.
- 4.48 The Landscape Strategy continues to integrate the proposed building into the landscape and to create a series of memory points or scenes within the landscape for wedding / celebratory photography as is shown in Figure 10.



Figure 10: Extract from Memory Points in the Landscape Plan

- 4.49 The LVA has been updated to take account of the scheme amendments. As set out above, a visualisation has been prepared of the view of the site entrance from Brockley Hill (Photoviewpoint one in the LVA). There is no change to the conclusions of the LVA with the visual and landscape enhancement of this identified entrance view in the context of preserving the openness of the Green Belt.
- 4.50 The LVA concludes that the scheme has responded in a sensitive way to the surrounding context and landscape character and visual amenity and can be integrated successfully into the landscape without undue harm to the openness of the Green Belt. The proposals are therefore in accordance with LBH policies CS7, DM1, DM3, DM6 and DM22, LP policies 7.4 and 5.10 and LPITP policy G5.

5. Trees

4.51 The applicants arboriculturalist re-surveyed the site in January 2021 following the incidents of unauthorised entry to the site in 2020. An updated Arboricultural Report (AR) including a Tree Survey, Arboricultural Impact Assessment (AIA) and an Arboricultural Method Statement (AMS) along with an updated Tree Protection Plan has been prepared based on the latest tree survey and to take account of the change to the site area and re-siting of the SUDs pond and Secret Garden.

4.52 Trees to the south of the previously located SUDs pond that were to be removed to facilitate the SUDs pond are now to be retained. The development itself will now result in the removal of fewer trees than originally proposed with the loss of only two low quality trees due to the repositioning of the secret garden. Paragraph 6.9 of the Arboricultural Report describes these trees and advises that:

“These are low quality or unremarkable ‘C’ Category trees as set out in BS 5837:2012. They are not readily visible to the general public due to their internal position within the application site, relatively small size and intervening trees and other vegetation. However to mitigate for their removal it is proposed to undertake replacement tree planting within the site as part of the landscape proposals for the development. It is therefore assessed that the removal and replacement of these trees as part of the proposals will mean that the site development will not have a long term or significant impact on the visual amenity of the local area or its enjoyment by the general public. It is not so significant that it would lead to the refusal of Planning Permission.”

4.53 The report recommends that two trees are removed for arboricultural reasons: 1 willow (part of G5) which is severely damaged and 1 Birch (part of G6) that is dead.

4.54 There are no other changes to the content of the Arboricultural Report from the August 2020 report and the conclusion remains the same that the development is acceptable in arboricultural terms and should receive planning permission. The proposals are therefore in accordance with LBH policy DM22, LP policy 7.21 and NPPF paragraph 170.

6. Ecology

4.55 The Ecological Assessment has been updated in response to the scheme amendments, the revised Landscape Strategy Plan and Tree Survey and to report the findings of a reptile survey undertaken in September 2020.

4.56 In terms of Biodiversity net gain, the Ecological Assessment concludes that:

*“The proposals as presented in the indicative Landscape Strategy Plan (13201/P11b) and the site Master Plan (05851_MP_00_2200-14) would result in a net gain of **+20.02% habitat units** and a net gain of **+49.55% hedgerow units**.”*

4.57 With the scheme amendments, the proposals will still achieve over 20% biodiversity net gain in terms of both habitat and hedgerow units providing an ecological benefit to the site.

4.58 A Reptile Survey was undertaken in October 2020. Over seven site visits no reptiles were found to be present on site. Whilst many of the majority of mats were placed around the wider golf course site outside of the current planning application boundary, the Ecological Assessment advises that the habitats are well connected and those habitats found offsite are more suitable than those found on site, the methodology is considered appropriate and the results reliable.

4.59 The updated Ecological Assessment maintains the same conclusion as the original Assessment that:

“it is considered that the future development of the site would accord with relevant planning policy that seeks to protect and enhance ecological features and that the mitigation and enhancement strategy can be secured by planning conditions.”

4.60 The proposals are therefore in accordance with LBH policies CS 1(E), DM20 and DM21, LP policy 7.19, LPITP policy G6 and NPPF paragraphs 8, 170 and 175.

7. Archaeology

4.61 The changes to the scheme result in no change to the content or conclusions of the submitted Archaeological Desk Based Assessment. The historical maps and plans in the Appendix have been updated with the amended site area and planning application boundary.

4.62 The conclusions of the Planning Statement in paragraphs 6.159 and 6.160 remain valid and the proposals are therefore in accordance with LBH policy DM7, LP policy 7.8, LPITP policy HC1 and paragraphs 189, 192 and 197 of the NPPF.

8. Transport and Highways

4.63 There are no changes to the proposed site entrance and area and number of car parking spaces. The GLA, Harrow and Barnet Highways are in general acceptable of the principle of the development, the proposed new access arrangements, cycle parking and the proposed travel plan measures.

4.64 Concerns have been raised by Harrow and Barnet Highways regarding the potential for larger events not conforming to travel plan modelling that would result in guests having to park on the public highway.

4.65 In response to the 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.

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

4.67 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 applies the same principle.

- 4.68 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 the overflow car parking, one of which could include the Manor Hotel, Barnet Lane in Elstree, which is also owned and operated by the applicant.
- 4.69 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.
- 4.70 The Transport Assessment has been revised to address comments from the GLA, Harrow and Barnet Highways. There are no changes to the conclusions in the Transport Assessment. The proposals include a policy-compliant level of car and cycle parking, provision for deliveries and servicing and with an effective sustainable travel plan are reasoned to result in a benefit to the overall transport system across Harrow and beyond. The proposals are compliant with LBH policies DM42, DM43 and DM 44, LP policies 6.9, 6.10 and 6.13 and LPITP policies T1, T2, T4, T5 and T6.

9. Flood Risk and Drainage

Re-siting of the SUDs pond

- 4.71 The scheme amendments include the repositioning of the SUDS pond to the west of its original proposed location. The Flood Risk Assessment and Drainage Strategy has been updated to reflect this change. The conclusions of the report in respect of the SUDs pond remain the same as the originally submitted report.

Amendments to the Flood Risk Assessment and Drainage Report following consultation

Consultation with the Council’s Drainage Officer

- 4.72 EAS met the Harrow Drainage Officer for a site walkover and discussion on flood risk and drainage on 11th September 2020. The Officer requested a CCTV survey of the downstream end of the ditch within the site, where there is a trash screen/headwall, to confirm the connection to the culverted watercourse in Brockley Hill. The Drainage Officer also highlighted the requirement for floodplain compensation for part of the development and sizing the proposed French drains which will direct existing surface water overland flows away from the new building. All of these requirements have been addressed in revised report.
- 4.73 A Land Drainage Consent application will be made to Harrow Council once consultation commences on the amended scheme.

GLA Stage 1 Report

- 4.74 Paragraph 65 of the GLA Stage 1 comments on the submitted FRA and states that a full review of flood risks should be provided. The scope of the FRA has been agreed with the Council's Drainage Officer and addresses all potential sources of flood risk to the site.
- 4.75 The report in paragraph 66 advises that the applicant should look to include water reuse measures and green or blue roofs as part of the development and provide the London Borough of Harrow's version of the London Sustainable Drainage Proforma.
- 4.76 The purpose of green or blue roofs is to store rainwater as part of a sustainable urban drainage system and these are mostly used where there is no other practical alternative. The site has sufficient room to incorporate a SUDs balancing pond which also provides amenity, biodiversity and water quality benefits. The pond could potentially also be used for irrigation purposes. The proposed SUDs pond is therefore a more beneficial SUDs measure than a green or blue roof.
- 4.77 A copy of the London Borough of Harrow's version of the London Sustainable Drainage Proforma is included within the FRA.

Summary

- 4.78 The Flood Risk Assessment and Drainage Report has been updated to reflect the re-siting of the SUDs pond and with additional information such as the CCTV drain survey in response to comments from the Council's Drainage Officer and GLA Stage 1 Report. The conclusions of the report have not changed and the application is considered to be acceptable on flood risk and drainage grounds provided the recommended mitigation measures are included to protect the development against surface water flooding. These mitigation measures can be secured via a planning condition.
- 4.79 The proposed development is therefore compliant with the requirements of LBH policies DM9 and DM10, LP policies 5.12 and 5.13, LPITP policies SI 12 and SI 13 and paragraphs 163 and 165 of the NPPF.

10. Energy and Sustainability

Scheme Amendments

- 4.80 Eight Associates have undertaken a review of the proposed scheme amendments including the proposed design changes to the south and west elevations of the proposed building and have advised that these do not alter the contents or conclusions of the Energy Assessment, Overheating Assessment, Lifecycle Assessment or BREEAM Preliminary Assessment. The proposed development still has a target of BREEAM 'Excellent'.

GLA Stage 1 Report

- 4.81 The Stage 1 report (paragraph 50) considers that the proposed energy strategy generally complies with the London Plan and Intend to Publish London Plan. Additional information is requested.
- 4.82 The report asks for the submission of the GLA's Carbon Emission Reporting spreadsheet (paragraph 51). This spreadsheet is enclosed as part of the revised submission.

- 4.83 In respect of existing or planned district heat networks within the vicinity of the site a request was made to contact the Borough Energy Officer to enquire whether there are any local heat network connection opportunities (paragraph 55). hgh Consulting contacted David Hughes the Policy & Energy Officer at LBH who confirmed in an email on 23rd December 2020 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”* (see email exchange in Appendix 2).
- 4.84 The Stage 1 Report also requested the applicant provide: drawings demonstrating how the site is to be future proofed for a connection to a district heating network (paragraph 56); a drawing showing the route of the communal heat network linking all uses on the site; a drawing indicating the floor area, internal layout, and location of the energy centre (paragraph 57); and details of heat pumps (paragraph 59).
- 4.85 The project is currently at RIBA Stage 2 Planning Stage and not at a detailed enough stage to be able to provide the requested information pre-determination. This level of detail especially for a project of this type and scale is not normally determined until the next detailed design stage and the appointment of an M&E consultant and contractor which is normal practice for projects of this scale. hgh Consulting contacted the GLA officer to request that the above matters be dealt by a planning condition (see email exchange in Appendix 3). An email from the case officer at the GLA on 10th December 2020 confirmed that in this instance a planning condition to deal with these matters would be acceptable.
- 4.86 Paragraph 58 of the GLA report seeks clarification from the applicant as to why the flat roof areas are not suitable for further PV installations. As noted in Page 25 of the updated Energy Assessment and as advised by Eight Associates and 5Plus, the flat roof will not be suitable for further PV panel installations due to the loading and the partially shade from the south building.
- 4.87 There is no change to the content or conclusions of the Energy Statement, Overheating Assessment, Lifecycle Assessment and BREEAM Preliminary Assessment as a result of the proposed changes to the application and comments from the GLA.
- 4.88 The proposals therefore comply with the requirements of LBH policies DM12, DM13 and DM14, LP policies 5.2, 5.3 and 5.6, LPITP policy SI2 and paragraph 50 of the NPPF.

11. Amenity

- 4.89 The scheme amendments do not result in any changes to the content or conclusions of the Noise Impact Assessment (NIA). The Appendices of the NIA have been updated with the revised plans and drawings.
- 4.90 The GLA in the Stage 1 Report (paragraph 34) have accepted the findings and conclusions of the NIA and recommended that LBH should secure details of noise mitigation measures to ensure compliance with the Agent of Change principle. The applicant is willing to discuss and agree a suitably worded noise condition aligned to the survey findings and recommendations of the NSL Noise Report.
- 4.91 No changes to the proposed details of lighting as set out in the DAS are proposed.

4.92 The proposals are therefore compliant with LBH policies DM1 and DM12, LP policy 7.15, LPITP policy D3, D13 and D14 and paragraphs 170 and 180 of the NPPF.

12. Waste Management

4.93 No change is proposed to the waste management facilities. The proposal is therefore in accordance with LBH policy DM45.

13. Community Infrastructure Levy

4.94 There has been no change to the proposed floorspace of the development and therefore no change to the CIL calculation in the Planning Statement.

5.0 Summary and conclusion

5.1 This Supplementary Planning Statement has been prepared by hgh Consulting on behalf of Sairam (Holdings) Ltd to supplement the Planning Statement (August 2020) that was submitted to the London Borough of Harrow (LBH) in support of a planning application (ref: P/3088/20) at the former Stanmore and Edgware Golf Centre, Brockley Hill, Stanmore, HA7 4LR, for the following development:

“Demolition of existing golf club buildings (Use Class D2) and construction of a new banqueting facility (Use Class D2), widening of the existing vehicular access from Brockley Hill, car and cycle parking, waste / recycling storage, landscape enhancements and associated works”

5.2 The statement sets out the minor amendments that have been made to the scheme as a result of a change to the site area and in response to comments made by statutory consultees to date.

5.3 No changes are proposed to the principal elements of the proposed scheme as set out in the original planning application submission relating to the siting, footprint, floorspace, scale and height of the building; proposed access from Brockley Hill; layout and number of car parking spaces; and amount of hardstanding.

5.4 Within the reduced redline application area/boundary the amendments to the scheme are minor and include: re-siting of the SUDS pond and drainage routes, re-siting of the secret garden, revision to the pagoda, path and processional route, secure replacement entrance gates, additional hedgerow planting around the entrance and retention of trees to the south.

5.5 Responding to comments from the Council’s Design Officer minor changes to the building include amendments to the southern and western elevations to introduce a gable end to the Front of House building and split the wrap around balcony into two balconies. Further details of these amendments are set out in the Supplementary DAS.

5.6 An assessment of these minor amendments in this Statement concludes that none of these would give rise to any additional material harm compared with the original scheme and in some regards an enhancement, including design and net gain in hedgerow units.

5.7 A number of the technical reports (Landscape Visual Assessment, Arboricultural Report, Ecology Report, Archaeological Desk Based Assessment, Transport Assessment, Flood Risk and Drainage Assessment, Energy Statement, Overheating Analysis, BREEM Preliminary Assessment, Lifecycle Assessment and Noise Impact Assessment) have been updated in response to the amendments. There is no change to the conclusions of these reports.

5.8 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. The applicant is prepared to enter into a s106 obligation to submit details for an “*Overflow Parking Scheme*” to be agreed with Harrow Council prior to the first occupation of the development. The development would then have to be operated in accordance with this scheme. This proposal would overcome any concerns by the highways authorities in respect of overspill parking on the public highway.

- 5.9 The amended scheme is in accordance with policy at all levels in respect of design, landscape and visual impact, trees, ecology, archaeology, transport, flood risk and drainage, energy and sustainability including overheating and BREEAM and amenity. It will result in the significant environmental, social and economic benefits set out in the Planning Statement.
- 5.10 Based upon the detailed planning assessment presented in support of this scheme in the Planning Statement and this Supplementary Planning Statement, the applicant contends that the case in support of the redevelopment of this existing site for the proposed banqueting facility is compelling and that the scheme should be supported by the Council and planning permission granted.



hghconsulting.com