

Planning Statement
Brockley Hill, Stanmore – New
Banqueting Facility

Relating to site at
Former Stanmore and Edgware Golf Centre
August 2020



hghconsulting.com



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1.0 Introduction

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

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

- 1.2 The submission of this planning application follows a number of pre-application meetings and discussions with senior planning officers at the LBH, presentation of the scheme to the LBH Design Review Panel (DRP), a pre-application meeting with the GLA and meetings with highways officers at LBH and the London Borough of Barnet (LBB).
- 1.3 The applicant owns Premier Banqueting (who host a wide range of events including weddings, celebratory festivals and charity functions for the multi-cultural communities of Harrow). The company is being compelled to relocate from its current venue at 1 Canning Road in Harrow by March 2021. This enforced re-location is due to the termination of a lease (by the Council) for car parking spaces at the Peel House car park, which directly serves the Premier Banqueting facility opposite, because it is the site of the Council’s approved new Civic Centre redevelopment proposals. Even though the existing venue is within the town centre, due to the nature of events, where guests are in their wedding/celebratory attire, the vast majority of guests travel to the site via private means of transport i.e. organised coaches, taxis and others travelling by private car. It is therefore essential that the business relocates to a site with sufficient car/coach parking for it to continue to operate.

Site Location

- 1.4 The site is located in the London Borough of Harrow and comprises a former golf centre as shown on the Site Location Plan in Figure 1 and aerial photograph in Figure 2 below.



Figure 1: Site Location Plan



Figure 2: Aerial photograph showing the former golf centre

- 1.5 This statement provides a detailed assessment of the proposals in relation to the statutory development plan and other material considerations. It provides a reasoned justification as to why planning permission should be granted and demonstrates how the proposed development complies with the Development Plan and planning policy. It explains how the replacement building will be highly sustainable making best use of previously development land in the Green Belt and how the scheme will deliver landscape, biodiversity and other benefits.
- 1.6 This statement should be read in conjunction with the accompanying plans and drawings, Design and Access Statement and other reports outlined in paragraph 1.12.

1.7 Key principles of the scheme include:

- Replacement banqueting facility: retaining one of the only facilities of this type in Harrow to support the multi-cultural community of the Borough.
- Efficient re-use of previously developed land in the Green Belt;
- Replacement building with a higher standard of design and accessibility than the former golf centre building that integrates with the landscape.
- Highly sustainable new building targeting BREEAM 'Excellent' and achieving 56% reduction in carbon emissions over Building Regulations;
- Removal of the existing fence, netting and external lighting associated with the driving range substantially improving the visual appearance of the site;
- Implementation of a landscape enhancement strategy providing betterment in landscape terms as well as 20% biodiversity net gain.
- New footpath for pedestrians to Brockley Hill to create a safer and quicker walking route;
- Retention of the majority of existing car parking spaces;
- Widening of vehicular access onto Brockley Hill to facilitate coach ingress and egress and the alteration of the junction to prevent right turns into the site from the north;
- Introduction of a Travel Plan for the site to promote and encourage sustainable travel;
- Sustainable Urban Drainage features including the creation of a pond that will also provide biodiversity benefits.
- Contribution to the local economy through the provision of employment and use of local suppliers.

Need for EIA

1.8 A formal request for a Screening Opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 was made to LBH on 20th August 2020. LBH has three weeks in which to provide an opinion as to whether EIA is required or not for the proposed development.

Referral to the Mayor of London

1.9 The Town and Country Planning (Mayor of London) Order 2008 requires planning applications that are of potential strategic importance (PSI) to be referred to the Mayor of London. An application is referable to the Mayor if it meets any of the criteria set out in the Order. The proposed development falls within Category 3D:

1 Development –

- (a) On land allocated as Green Belt or Metropolitan Open Land in the development plan.....
- (b) Which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building.

- 1.10 The application site is within the Green Belt, although there is no change in use the proposed development is for a building with a floorspace of 1,458sqm. As such the planning application is referable to the Mayor of London under the provisions of the Order.

The Applicant and Consultant Team

- 1.11 hgh Consulting are the appointed planning consultants and have been instructed to prepare this Planning Statement and submit the planning application in respect of this proposal. 5Plus Architects are the appointed architects for the scheme and have prepared the Design and Access Statement.

- 1.12 The planning application submission includes the following documents:

- Design and Access Statement (5Plus Architects)
- Drawings (5Plus Architects)
- Planning Statement (hgh Consulting)
- Sequential Site Assessment (hgh Consulting)
- Landscape and Visual Appraisal (Tyler Grange)
- Ecological Assessment (Tyler Grange)
- Landscape Strategy Plan (Tyler Grange)
- Aboricultural Report (Dave Clarke Chartered Landscape Architect)
- Archaeological Desk Based Assessment (Archaeology Collective)
- Transport Assessment, Travel Plan and Car Park Management Plan, Delivery and Servicing Plan, Outline Construction and Logistics Plan / Construction Traffic Management Plan and ATZ Healthy Street Photo Survey Assessment (EAS)
- Flood Risk Assessment and Drainage Report (EAS)
- BREEAM Pre-Assessment (Eight Associates)
- Energy Assessment (Eight Associates)
- Overheating Assessment (Eight Associates)
- Lifecycle Assessment (Eight Associates)
- Noise Impact Assessment (Noise Solutions)

Structure of Statement

1.13 This statement is structured as follows:

Section 2 provides a description of the site and surrounding area;

Section 3 describes the planning history of the site;

Section 4 provides a description of the application proposals;

Section 5 provides a summary of national and local planning policy and guidance of relevance to the proposals;

Section 6 examines the planning considerations of the proposed development; and

Section 7 draws out conclusions in respect of the proposals.

2.0 Description of the Site and Surrounding Area

Site Description

- 2.1 The application site, as shown in Figures 1 and 2 is located within the administrative boundary of the London Borough of Harrow, between the A5 Brockley Hill and Stanmore Country Park. Brockley Hill forms the boundary between LBH and the LBB and falls within the administration and jurisdiction of LBB Highways.
- 2.2 The site area is 6.9 hectares and has previously been occupied by the former Stanmore and Edgware Golf Centre (Use Class D2) comprising a large two storey clubhouse building (Figures 3 and 4) including a driving range to the north (Figure 5), golf course around the remainder of the site and other ancillary buildings.



Figure 3: Photograph showing former club house building



Figure 4: Photograph showing rear of former club house building / driving range



Figure 5: Photograph showing former driving range

- 2.3 The site has circa. 95 car parking spaces to the south of the Golf Centre building. Pedestrian and vehicular access is from Brockley Hill (A5), roughly midway between its junction with Wood Lane to the north and the A410 (London Road / Spur Road) to the south. The access road is around 5 metres in width, widening where it meets Brockley Hill (Figure 6).



Figure 6: Photograph showing the entrance to the site with clubhouse building, netting and lighting in the background

- 2.4 There are significant level differences across the site with a gradual decline in ground height from north to south. The driving range and golf course have a number of bunkers and the driving range is bounded by high metal fencing, netting and floodlighting. The driving range building also contained a bank of floodlights at first floor level and on the roof.
- 2.5 There is extensive vegetation and trees on all boundaries of the site.
- 2.6 The former Golf Centre was closed prior to COVID-19, due to it being a failing and unviable business. Unfortunately since work commenced on the proposals for the new banqueting facility, the former building has been subject to an extensive fire (June 2020) and the majority of the building has been destroyed. Prior to this there had been a significant amount of pre-application discussion / meetings with senior officers at LBH and technical assessment work carried out by the various consultants. Additional photographs of the site prior to the fire can be found in the Design and Access Statement (DAS) and Landscape and Visual Appraisal (LVA).

Surrounding Area

- 2.7 The area directly to the south of the site comprises part of the former golf course and is in separate ownership to the application site. South of this land is Cleopatra Park. Approximately 125m south of the former golf course land (and circa 285m south of the golf course building) are a number of residential properties on Cleopatra Close and Augustus Close which forms the northern part of a residential area to the south that forms the edge of the built up area of Stanmore.
- 2.8 The site is bounded to Brockley Hill on its eastern boundary. To the south east are residential properties on Pipers Green Lane and Grantham Close some 250m to the nearest property as the crow flies.
- 2.9 Land to the north and west of the site is surrounded by Stanmore Country Park. Photographs of the surrounding area can be found in the DAS and LVA.
- 2.10 The site is located around 1.3 km north-east of Stanmore district centre; around 850 metres north-east of Stanmore underground station; and around 700 metres south-west of the Royal National Orthopaedic Hospital campus.

Planning Designations

- 2.11 The application site is located within the Green Belt as shown on the adopted Proposals Map (Figure 7).
- 2.12 The site is also covered by the following designations:
- Core Strategy Sub Areas: Stanmore and Harrow Weald;
 - Harrow Weald Area of Special Character;
 - Archaeological Priority Area (a strip of land to the east of the site which runs through part of the car park and golf course); and
 - Surface water flood zone 3a/3 (part of the site in front of the club house building).

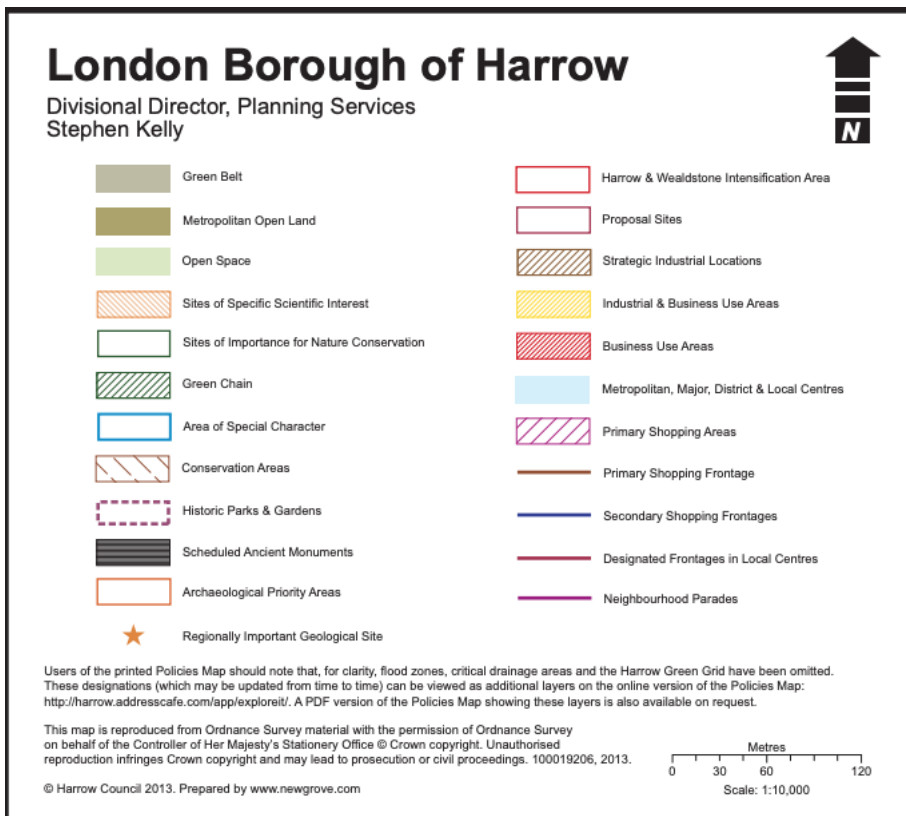


Figure 7: Extract from adopted Harrow Proposals Map

- 2.13 The western boundary of the site is adjacent to Pear Wood and Stanmore Country Park Site of Importance for Local Conservation
- 2.14 The site does not lie within a Conservation Area nor are there any listed buildings on or immediately surrounding the site.

Flood Risk

- 2.15 As identified on the Environment Flood Map for Planning (Figure 8) the site is within Flood Zone 1.



Figure 8: Extract from Environment Agency Flood Map for Planning

- 2.16 The LBH has its own Flood Risk Maps. The Flood Risk Map for the site identifies that parts of the site are within a Surface Water Flood Zone 3a/3 (Figure 9).



Figure 9: Extract from LBH Flood Map

2.17 Further details are provided in the Flood Risk Assessment and Drainage Report.

Transport

2.18 The application site has a PTAL of 1a as shown on the extract from the TfL Planning Information Database (Figure 10). Stanmore Underground Station is approximately 1.5km away (approximately a 19 minute walk) from the application site and provides regular services on the Jubilee line into Central London and with an interchange at Wembley Park.



Figure 10: Extract from TfL Planning Information Database

2.19 The nearest bus stop to the site is located to the south of the site on Brockley Hill approximately 300m away. These bus stops are served by the 107 bus service between New Barnet and Edgware via Elstree and Borehamwood.

2.20 The site is very well connected to both the A1 and M1, with access from A5 Brockley Hill. Further details are provided in the Transport Assessment.

3.0 Planning History

3.1 An extant planning permission allowed on appeal (23 August 2018 and ref: APP/M5450/W/18/3201017) exists for the site for the following proposed development:

“Change of use from a golf driving range with ancillary golf shop and first floor flat (Class D2) together with two storey rear extension and external alterations to nine flats (Class C3); Single storey detached building at side for use as replacement golf reception building; provision of parking, refuse and cycle facilities.”

3.2 The appeal decision (**Appendix 1**) confirms that the golf centre building, together with its adjacent storage areas and car park, constitute previously developed land as defined in the NPPF (paragraph 11 of appeal decision):

“On the evidence before me, there appears to be no disagreement between the parties that the golf centre building, together with its adjacent storage areas and car park, constitute previously developed land as defined in the Framework.”

3.3 The decision also considered that the removal of the high driving range fence, and the tall metal pylons which support it would further enhance the openness of the Green Belt (paragraph 16).

3.4 The appeal decision concluded that:

“For the reasons given above, the proposed development satisfies the relevant qualifying criteria of paragraphs 145 and 146 of the NPPF. The proposal could not constitute inappropriate development within the Green Belt or conflict with the Green Belt protection aims of Policy 7.16 of the London Plan or the NPPF. As the development is not inappropriate, there is no requirement for very special circumstances to be demonstrated in this instance” (paragraph 19).”

3.5 The proposal involved the retention and continued operation of a sports facility from the site, albeit in a reduced form with the closure of the driving range. The Inspector considered that *“the proposed removal of the on-site golf shop would not have significant implications for the provision of outdoor sports facilities”* (paragraph 21).

3.6 The Inspector went on to consider the potential impact of the closure of the driving range for the provision of outdoor sports facilities. She accepted the evidence from the appellant that the operation of the site had been affected by its narrower range of facilities and a general downturn in golf activities and spending (paragraph 22).

3.7 The Inspector also found that although alternative facilities were not within walking distance given the nature of golf and the amount of equipment required, it was unlikely that participants would walk to such a facility (paragraph 23). She also advised that she had no evidence before her to suggest that the local area is otherwise deficient in sports facilities:

“A number of the nearby facilities referred to, all of which are within around 6.5km of the site, have driving ranges. These are not within walking distance, as referred to in Policy DM 47 of the Harrow Development Management Policies Document (the DMP). However, given the particular nature of golf in terms of the amount of equipment required, I find it highly unlikely that most participants would walk to such a facility. I have no evidence before me to suggest that the area is otherwise deficit in sports facilities. Therefore I cannot conclude that a reduction in the level of provision at the appeal site as proposed would have significant implications for the availability of sports facilities in the area.

The proposal would therefore not conflict with Policy CS 1(G) of the Harrow Core Strategy or Policy DM 47 of the DMP. Amongst other things, these policies aim to support public access to sports facilities, and state that the loss of an existing facility will be permitted if there is no longer a need for that facility, or there are adequate facilities which offer equivalent provision” (paragraphs 23 and 24).

4.0 Application Proposals

Background to the application proposals

Need for the Proposed Development

- 4.1 The key driver of the proposal is that Premier Banqueting (who host a wide range of events including weddings, celebratory festivals and charity functions for the multi-cultural communities of Harrow) must relocate from its current venue at 1 Canning Road Harrow by March 2021. This enforced relocation is due to the termination of a lease (by the Council) for circa. 280 car parking spaces at the Peel House car park, which directly serves the Premier Banqueting facility located opposite, because it is the site of the Council's approved new Civic Centre redevelopment proposals. A review of events in 2019 confirms that around two thirds of events relied on the use of the car park. The operators have confirmed that they take over the whole of the car park on each occasion, that the car park is booked as it is easier from a management perspective both for the operator and the LBH.
- 4.2 Even though the existing venue is within the town centre, due to the nature of events, where guests are in their wedding/celebratory attire, the vast majority of guests travel to the site via private means of transport i.e. organised coaches, taxis and others travelling by private car. It is therefore essential that the business relocates to a site with sufficient car/coach parking for it to continue to operate.
- 4.3 Premier Banqueting has operated in LBH since 2008 and over this time has become an integral part of the multi-cultural infrastructure supporting the community of Harrow. The business relocated in 2012 to its current venue to meet the growing demand for larger events, the applicant previously ran Maurya restaurant in Stanmore. The business is well respected with an established clientele, which has focused on the Asian and Jewish communities within Harrow.
- 4.4 A replacement venue within the Borough is critical to business continuity and maintaining the client base that the applicant has built up over the years. Many of the staff that work for the business live in Harrow and many of the suppliers are also located in the Borough. If the business moved outside of Harrow, then it would impact significantly on the local community and result in local job losses.
- 4.5 The applicant has undertaken an extensive site search over a number of years (since at least 2015) to find a replacement site that is within Harrow, has sufficient capacity (500 guests) and a sufficient number of car parking spaces (at least 100) and an area for coaches to drop off/pick up guests. It was also important that the banqueting space had a sufficient floor to ceiling of height of least around 5m to provide sufficient space for events and to enable the venue to be dressed for these special occasions.
- 4.6 Paul Walker, Director and Regeneration and Planning at LBH has provided some assistance in this process. This search has involved serious consideration of some 20 sites (see Sequential Site Assessment for summary of sites investigated). Despite the fact that only a small number of potential sites were within the Borough (7), the applicant did investigate 12 sites outside of the Borough to see if there was anything exceptional that might have continued to attract clients from Harrow, but this did not yield any suitable sites. Alternative sites in Harrow were not considered to be suitable or available for a number of reasons including that the majority did not have sufficient seating capacity or car/coach parking spaces or a suitable internal layout. For further details refer to the Sequential Site Assessment.

- 4.7 The site at Brockley Hill was identified as an available and suitable site for the relocation of Premier Banqueting, which could accommodate all of the business' requirements within the broad timetable to successfully relocate the business.
- 4.8 There is an identified lack of alternative banqueting facilities in the Borough catering for large capacity numbers. There are only three other venues in Harrow that can accommodate at least 400 guests (Appendix 2). The current venue is unique providing an important facility for the multi-ethnic communities of Harrow. The loss of Premier Banqueting would reduce the number of these facilities and impact adversely on the social and economic 'multiplier' benefits it brings to the Borough.

Pre-application discussions

- 4.9 The applicant and consultant team has undertaken a substantial amount of pre-application discussion / meetings with senior officers at LBH (Case Officer, Team Leader and the Head of Development Management) and a presentation to the LBH Design Review Panel. A Level 2 pre-application meeting has been held with officers at the GLA (Case Officer, Team Leader, Design Officer and Officer from TfL). There have also been discussions with Highways Officers at both LBH and LBB. These discussions have shaped and informed the design proposals resulting in the application scheme.
- 4.10 A summary of the evolution of the design of the proposed development and various design iterations is presented in the DAS. A summary of the various pre-application meetings and discussions and how these have shaped the final scheme is set out below.

LBH Pre-application meeting 1 (3rd March 2020)

- 4.11 At the first meeting background information on Premier Banqueting, the need for the relocation of the facility and applicants brief for the proposed banqueting facility including the size of banqueting space and ancillary facilities were presented to officers'. The presentation explained why the existing building could not be reused and adapted for the banqueting facility. This included that the building would be unsuitable due to the lack of clear floorspace, insufficient floor to ceiling heights and split levels at the first floor making the floorspace unusable as a function space.
- 4.12 The design team presented the initial design concepts. The scheme proposed a front of house building adjacent to the existing car park to the south following the building line of the existing building, a large banqueting area facing the north with the back of house building facing west. The proposal sought the removal of development in the areas occupied by the two wings of the existing building.
- 4.13 The initial scheme was sited partially on the footprint of the existing building set back slightly from the car park. Access was directly from the car park similar to the existing building. The first iteration of the scheme proposed an increase in footprint of 65.4% and an increase in floorspace of 29%. The initial proposal was confined to a smaller site area with a tighter red line than the application proposals due to the fact that the applicant did not have full control to undertake any works on this land.
- 4.14 Officers advised that the footprint of the proposed building should be in the area of previously developed land and that the building line should be pushed further southwards towards the car park. They also considered that the proposed increase in footprint was too large for this site within the Green Belt.

LBH Pre-application meeting 2 (17th March 2020)

- 4.15 The design team presented a second iteration of the scheme to senior officers’.
- 4.16 The second iteration of the design maintained the original concept of the three separate building, front of house, back of house and the banqueting area. In response to comments by officers the scheme was re-sited to previously developed land and the proposed building positioned forward of the building line of the existing building without encroaching into the car park. The entrance to the building was moved to the east facing side. The scheme was reduced in size in terms of both footprint and floorspace.
- 4.17 Officers also raised whether the opportunity could be taken to make best use of the large amount of space on the site and the proposed banqueting hall to incorporate sports facilities as part of the overall scheme. It was suggested that there was a requirement for table tennis space in the Borough.

LBH Pre-application meeting 3 (4th June 2020)

- 4.18 The Design Team presented a further iteration of the scheme to officers’ on 4th June 2020 which continued the concept of the three buildings: front and back of house and the banqueting room.
- 4.19 New elements of the scheme included storage for table tennis equipment in association with the use of the banqueting hall for table tennis and a sports pavilion to store archery equipment in support of archery being played on the site.
- 4.20 The footprint of this iteration of the scheme was 40% larger than the existing building.
- 4.21 The design team presented the Landscape and Visual Appraisal work that had been undertaken by Tyler Grange which demonstrates the very limited view of the existing buildings and proposed development in the surrounding landscape and opportunities for landscape enhancement were explored.
- 4.22 Officers requested that the applicant present the outline of a Very Special Circumstances case to justify the proposed development in the Green Belt. They also advised that the scheme needed to be considered by the Council’s Design Review Panel (DRP) and that there needed to be a Level 2 pre-application meeting with the GLA.
- 4.23 Officers suggested that the wider site outside of the original red line boundary presented an excellent opportunity for landscape enhancement and to integrate the building with the landscape.
- 4.24 The meeting was attended by the Council’s Ecology officer who recognised the potential of the site and opportunities for the scheme to deliver biodiversity net gain. The question was raised as to why landscaping and biodiversity enhancement were limited to the area immediately adjacent to the building.
- 4.25 Post the third pre-application meeting hgh Consulting submitted an overview of the proposed very special circumstances case to justify the proposed development in the Green Belt.

Design Review Panel

4.26 The scheme presented at the third pre-application meeting was presented to the Council's DRP on 25th June 2020. The formal response from the DRP is at **Appendix 3** and comments from the DRP included the following:

- An exemplary architectural, landscape and sustainability response is required and increasing BREEAM rating to 'Excellent' will be of critical importance for a new build development.
- The proposed development is successful in reducing visual presence on the surrounding context by being less longitudinal and more compact in plan than the current building.
- The Panel questioned the arrangement of the buildings and didn't think that the proposals took advantage of views / aspect to the south and west.
- The current proposal has three distinct buildings with different material treatments. There should not be different material pallets for each section of the building, but a single pallet of material creating a more cohesive building.
- Welcomed intention to minimise the building footprint.
- Asks the applicant to consider creating a more cohesive collection of buildings by pulling the buildings apart and a courtyard that is a common typology in rural settings, allowing an opportunity to maximise the benefits of the new rural setting with gradual thresholds between outside and inside.
- The Panel suggested exploring how the architecture could support wedding photography by creating a series of special moments or scenes.
- No explanation is provided for the separation of the sports pavilion from the rest of the building.
- Suggest that the focal function of the building should be re considered.
- Consider the potential for the food-tasting and entrance foyer to rationalise and become a single celebration space, leading more directly to the banqueting area.
- The entrance to the building should be considered further and a ceremonial processional route should be clearly defined.
- New hardstanding should be permeable.
- The Panel strongly encouraged the applicant to develop a more holistic approach to the site including the area that was outside the original red line boundary in terms of biodiversity net gain and energy generation.
- The Sustainability ambitions of the building should be exemplary and the Building achieve BREEAM Excellent including an embodied energy approach.

LBH Pre-application discussion re VSC case and form of building (June 2020)

- 4.27 Following the DRP, further discussions were held with a Senior Officer at the LBH to understand the Council's response to the overview of the VSC case. Officers advised that they wished to work with and support the applicant in terms of the proposals. However, they considered that the VSC case presented was not considered to amount to VSC that would offset the harm to the Green Belt from the proposed building. Officers advised that the change in circumstances following the fire of what would be a new building as opposed to a replacement building would need to be addressed in policy terms.
- 4.28 Officers confirmed that if the footprint of the proposed building was reduced to circa 30% of the existing building then the principle of the development in theory would be appropriate and the applicant would not need to demonstrate that VSC's existed.
- 4.29 Officers advised that the provision of indoor table tennis and archery was not a recognised deficit in the Borough and was not considered to contribute towards the VSC case.
- 4.30 Officers also advised the applicant to continue to progress the design of a consolidated/compact development in terms of massing. This was opposed to the alternative approach suggested by the DRP of processional linked buildings with a central courtyard.

Response to DRP and LBH

- 4.31 In response to the comments raised at the DRP and subsequent discussions with officers the applicant and design team made the following changes to the design of the proposed development:
- The building was reduced in size so that it has a footprint circa 30% of the footprint of the existing building, resulting in a building that is not materially larger than the one it replaces and has no impact on the openness of the Green Belt and hence a VSC case is not required to justify the proposed development in the Green Belt.
 - To reduce the overall footprint of the proposed built development; and following feedback from LBH who confirmed that the Borough does not have a deficit of table tennis facilities, the proposed sports facilities have been omitted from the proposals. This also addresses comments on the arrangement of these facilities by the DRP.
 - The design team investigated whether the building could be re-designed to have the back of house, front of house and banqueting area split apart by a courtyard as was suggested by the DRP. A building with this layout was not considered to be appropriate as it would have a greater area of developed land and was against the opinion of officers at LBH who have advised that a more compact scheme is more appropriate in this location in the Green Belt.
 - The back of house part of the main building was flipped from being sited on the west side of the banqueting facility to the east. This enables a single celebration space/reception area to be created on the south west side of the building leading out onto a secret garden making the most of the views / aspects to the south and west of the site.

- To facilitate the reception space to the south west of the building, the service yard has been relocated to the west side of the building adjacent to the back of house facilities and facing the entrance from Brockley Hill. A living wall is proposed to screen these facilities and will also provide a processional route from the front of the building through to the main entrance, into the reception area and into the banqueting hall.
- The architects have been working with the consultant team and are now targeting a BREEAM score of Excellent. This includes the preparation of a Lifecycle Assessment that has been submitted to the BRE and was also a recommendation of the DRP.
- A reduced materials pallet was proposed giving the appearance of a cohesive single building as opposed to three separate buildings as recommended by the DRP.
- The applicant is now able to bring the land to the north within the red line boundary to facilitate an implementable Landscape Strategy across the land to the north of the proposed building and increasing biodiversity net gain to a target of 20%.
- The Landscape Strategy provides a number of memory points as recommended by the DRP

GLA Pre-application meeting (29th July 2020)

- 4.32 The team presented the amended scheme to the GLA (Planning and Design Officers and an Officer from TfL).
- 4.33 Officers from LBH confirmed that the Council was supportive of the principle of the proposed development.
- 4.34 Officers at the GLA advised that they would need to see a very clear analysis of the existing and proposed built footprint and massing. They were supportive of the proposals to increase biodiversity on the site and the sustainability credentials of the proposed development. Officers advised that they would like to understand how the design considers the noise impact of the site and the potential impact of noise on neighbours. A noise assessment was requested to be submitted as part of the application.
- 4.35 The Design Officer suggested that as much detail as possible should be provided with the planning application on materials and landscape. He considered that the scheme was positive from a design point of view.
- 4.36 The officer from TfL advised that the proposed development would be assessed against the London Plan policy on sustainable travel and requested that the Transport Assessment was a full 'Healthy Streets Transport Assessment'. TfL would also like to see a consideration of vulnerable users accessing the site to ensure that coaches are kept separate from pedestrians.
- 4.37 The formal pre-application response from the GLA is currently awaited.

LBH Pre-application meeting 4 (6th August 2020)

- 4.38 The design team presented the latest scheme to officers. Following the GLA meeting the design team took on board comments from the GLA and TfL including the need to separate vehicular access from Brockley Hill from more vulnerable road users. The scheme now incorporates a clear pedestrian route internally separated from the vehicular access and an additional pedestrian route onto Brockley Hill.
- 4.39 An acoustic consultant was also appointed to provide advice on the potential impact on neighbours in terms of noise.
- 4.40 Officers considered that the scheme was a relevant exception to inappropriate development in the Green Belt under paragraphs 145(g) and 146(e)
- 4.41 Officers advised that the applicant should undertake a Sequential Site Assessment to demonstrate that there are no alternative sites in the Borough in urban locations or with a higher PTAL.
- 4.42 Officers requested the existing and proposed details of the new areas of hardstanding and suggested that the proposed staff car parking and refuse area should be landscaped.
- 4.43 Officers confirmed that they agreed with the alterations to the proposed layout and the flipping of the buildings.
- 4.44 The Council's Ecology officer advised that he would like to understand how the management of the landscape will relate to the adjoining Country Park and would like to see a matrix of habitat areas, nesting birds, invertebrates.

Other pre-application meetings and discussions

- 4.45 In addition to the pre-application meetings with planning officers at LBH and the GLA, there have been a number of other technical discussions between members of the consultant team and their counterparts at LBH and LBB. Full details of these discussions are included within the accompanying application documents. Discussions have taken place with highways officers at the LBH and LBB, the infrastructure team at LBH re drainage and the ecology officer at LBH.

Consultation with Ward Councillors (24th August 2020)

- 4.46 The design team presented the scheme proposals to two of the Canons Ward Councillors. The Councillors were supportive of: the need for the banqueting facility for the community of Harrow; the proposed design and the amendment process to reduce the scheme; and the engagement undertaken to reach the latest proposal.
- 4.47 The Councillors sought clarification and reassurance on the proposed parking numbers and raised concerns regarding risk of overspill parking on local residential roads and noise impact. The Councillors were advised that a Noise Impact Assessment had been carried out and that the building will act as a buffer and with comfort cooling which would ensure noise is insulated as well as acoustic measures within the building/banqueting room around the sound system / dance floor.
- 4.48 The above demonstrates that the applicant and the consultant team has undertaken a substantial amount of proactive pre-application discussion with officers which has resulted in the application scheme. Details of the scheme are provided below.

Proposed Development

4.49 The proposal seeks full planning permission for:

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

4.50 The proposals are for the demolition of the existing golf club buildings (Use Class D2) and redevelopment of the site for a new banqueting facility (Use Class D2) to provide a banqueting use for the multi-cultural communities of Harrow to host functions such as weddings, bar mitzvahs, charity functions and other events.

Design

4.51 The footprint of the proposed building will be 1,108sqm and it will have a floorspace of 1,458sqm. The maximum height of the proposed building will be 106.055m.

4.52 From the outset of the design process, the brief from the applicant to the architect was to design a building that operationally would work as a banqueting facility as well as being sympathetic to the Green Belt. The proposed layout of the building will comprise of three elements:

- Front of house: This is the only two storey part of the building. The main entrance for guests; clockroom area; w/c's, staircase and lift to first floor and reception/food tasting area which opens up to a secret garden will be on the ground floor. The second floor will have a bridal suite, a secondary function room to with guest terrace and an ancillary office space.
- Banqueting hall: provides the main banqueting space for weddings and other functions.
- Back of house: provides all of the back of house functions such as kitchen, food store and staff facilities.

4.53 The building will target BREEAM Excellent. As part of the Energy and Sustainability Strategy the south facing roof on the back of house building will contain solar panels. Further details are shown in the DAS, application drawings, Energy and Overheating Assessments and the BREEAM Pre-Assessment.

4.54 Natural materials are proposed as illustrated on page 55 of the DAS.

Landscape

4.55 Improvements to the landscape surrounding the building and to the former driving range including filling in the former bunkers, areas of wildflower planting, a footpath up to the northern part of the site with photographic memory points along the way, a secret garden area and pond. The landscape enhancements will increase biodiversity on the site by 20%. Full details are provided on Landscape Strategy Plan, in the LVA and the DAS.

Widening of existing vehicular access from Brockley Hill

- 4.56 The proposals include the widening of the existing vehicular access from Brockley Hill into the site along with prohibiting vehicles turning right into the site from the north of Brockley Hill to enable coaches and refuse vehicles to safely ingress and access the site simultaneously and avoid congestion within the site or on Brockley Hill.

Adjustments to the internal vehicular and pedestrian layout

- 4.57 Adjustments to the existing car parking area will be made to facilitate coach and refuse collection vehicle turning. This involves the removal of car parking spaces. A layby also provides a safe passing place for coaches. A safe access for pedestrians is provided from Brockley Hill into the site either at the main entrance or further to the south of Brockley Hill. Safe pedestrian access is provided around the site.

Cycle Parking

- 4.58 Four cycle parking spaces will be provided for staff and 17 for guests within the service area to the rear of the back of house building. Showers and changing facilities will be provided.

Car Parking

- 4.59 84 car parking spaces will be retained. However, the car park will generally be restricted to 68 car parking spaces (62 for guests and 6 for staff). Further details are provided in Section 6.0 of this Statement and the Transport Assessment. The car park will also be able to facilitate coach parking if required.

Service, deliveries and refuse

- 4.60 A dedicated servicing and delivery area is proposed to the rear of the back of house element of the scheme. This area will contain the refuse and recycling bins. Delivery vehicles and refuse collection vehicles will be able to enter the site from Brockley Hill turn around the car parking area, drop off deliveries/collect refuse and exit the site in forward gear.

Sustainable Drainage

- 4.61 The scheme incorporates a number of sustainable drainage measures including a pond to the south of the secret garden that will also provide biodiversity benefits.

Operating Hours

- 4.62 The operating hours will follow those of the existing Premier Banqueting facility which vary from day to day depending on each individual event.
- 4.63 Full details of the scheme are shown on the application drawings and DAS.

5.0 Planning Policy

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of any planning application shall be in accordance with the development plan unless material considerations indicate otherwise.
- 5.2 The adopted development plan for LBH comprises:
- The London Plan - The Spatial Development Strategy for London (March 2016);
 - Harrow Local Plan Core Strategy (February 2012);
 - Harrow Development Management Policies Local Plan (July 2013);
 - Harrow Site Allocations Local Plan (July 2013); and
 - Harrow Adopted Policies Map.
- 5.3 Other material planning policy and guidance which are relevant to this application are set out below:
- National Planning Policy Framework (June 2019);
 - National Planning Practice Guidance; and
 - Intend to Publish London Plan (December 2019);

Harrow Core Strategy (2012)

- 5.4 Policies CS1: Overarching Principles and CS7: Stanmore and Harrow Weald Harrow are relevant to the proposal.

Harrow Development Management Policies DPD (2013)

- 5.5 Harrow Development Management policies that are relevant to this proposal include:
- **D2 Uses:** DM 35: New Town Centre Development; DM47: Retention of Existing Community, Sport and Education Facilities.
 - **Green Belt:** DM16: Maintaining the Openness of the Green Belt and Metropolitan Open Land.
 - **Design:** DM1: Achieving a High Standard of Development.
 - **Landscape and Visual Impact:** DM1: Achieving a High Standard of Development; DM3: Protected Views and Vistas; DM6: Areas of Special Character; DM22: Trees and Landscaping.
 - **Trees:** Policy DM22 Trees and Landscaping.
 - **Ecology:** DM20: Protection of Biodiversity and Access to Nature; DM21: Enhancement of Biodiversity and Access to Nature.
 - **Archaeology:** Policy DM7: Heritage Assets.
 - **Transport:** DM42: Parking Standards; DM43: Transport Assessments and Travel Plans; DM44: Servicing.
 - **Flood Risk and Drainage:** Policy DM9: Managing Flood Risk; DM10: On Site Water Management and Surface Water Attenuation.
 - **Energy and Sustainability:** DM12: Sustainable Design and Layout; DM13: Decentralised Energy Systems; DM14: Renewable Energy Technology.

- **Noise:** DM1: Achieving a High Standard of Development; DM12: Sustainable Design and Layout.
- **Waste Management:** DM45 Waste Management.

London Plan (2016)

5.6 LP policies that are relevant to this proposal include:

- **D2 uses:** 3.19: Sports Facilities; 4.7: Retail and town centre development.
- **Green Belt:** 7.16: Green Belt.
- **Design:** 5.3: Sustainable Design and Construction; 7.2: An inclusive environment; 7.4: Local character; 7.6: Architecture.
- **Landscape and Visual Impact:** 5.10: Urban Greening; 5.11: Green roofs and development site environs; 7.4: Local Character.
- **Trees:** 7.21: Trees and woodlands.
- **Ecology:** 7.19: Biodiversity and access to nature.
- **Archaeology:** 7.8: Heritage assets and archaeology.
- **Transport:** 6.3: Assessing effects of development on transport capacity; 6.9: Cycling; 6.10: Walking; 6.13: Parking.
- **Flood Risk and Drainage:** 5.12: Flood risk management; 5.13: Sustainable Drainage.
- **Energy and Sustainability:** 5.2: Minimising carbon dioxide emissions; 5.3: Sustainable design and construction; 5.6: Decentralised energy in development proposals; 5.7: Renewable energy; and 5.9: Overheating and cooling.
- **Noise:** 7.15: Reducing and managing noise.

London Plan Intend to Publish (December 2019)

5.7 The draft New London Plan was published in November 2017 and was subject to an EIP between January and May 2019. The Inspectors report and recommendations to the Mayor were published on 8th October 2019. The Mayor considered these recommendations and published the London Plan Intend to Publish (LPITP) in December 2019. This was sent to the Secretary of State and on 13th March the Secretary of State responded to the Mayor setting out his consideration of the plan.

5.8 It is understood that LBH is giving considerable weight to those policies in the LPITP that are considered to be acceptable by the Secretary of State.

5.9 Policies that are relevant to this proposal include:

- **D2 use:** SD7: Town centres, development principles and Development Plan Documents; S5: Sports and recreation facilities.
- **Green Belt:** G2: London's Green Belt.
- **Design:** D3: Optimising site capacity through the design-led approach; D4: Delivering good design; D5: Inclusive design.

- **Landscape and Visual Impact:** HC3: Strategic and Local Views; G1: Green infrastructure; G5: Urban greening.
- **Trees:** G7: Trees and woodlands.
- **Ecology:** G6: Biodiversity and access to nature.
- **Archaeology:** HC1: Heritage conservation.
- **Transport:** T1: Strategic approach to transport; T2: Healthy Streets; T4: Assessing and mitigating transport impacts; T5: Cycling; T6: Car Parking, T6.4: Hotel and leisure use parking and T6.5: Non-residential disabled persons parking; T7: Deliveries, servicing and construction.
- **Flood Risk and Drainage:** SI 12: Flood risk management; SI 13: Sustainable drainage
- **Energy and Sustainability:** SI 2: Minimising greenhouse gases; SI 3: Energy Infrastructure; SI 4: Managing heat risk; SI 7: Reducing waste and supporting the circular economy
- **Noise:** D3: Optimising Site Capacity through the design-led approach; D13: Agent of Change; D14: Noise

National Planning Policy Framework (NPPF) (2019)

5.10 Policies that are relevant to these proposals include policies within the following chapters of the NPPF:

- 2: Achieving sustainable development;
- 6: Building a strong, competitive economy;
- 7: Ensuring the vitality of town centres;
- 8: Promoting healthy and sustainable communities;
- 9: Promoting sustainable transport
- 11: Making effective use of land
- 12: Achieving well-designed places
- 13: Protecting Green Belt land
- 14: Meeting the challenge of climate change, flooding and coastal change
- 15: Conserving and enhancing the natural environment

6.0 Planning Considerations

6.1 This section assesses the proposals against the development plan and other material considerations and provides the planning justification for the proposed development. The planning considerations are as follows:

1. Principle of the Proposed Development;
2. Green Belt;
3. Design;
4. Landscape and Visual Impact;
5. Trees;
6. Ecology;
7. Archaeology;
8. Transport;
9. Drainage;
10. Energy and Sustainability including Overheating and BREEAM;
11. Amenity (noise and lighting);
12. Waste Management; and
13. Community Infrastructure Levy

6.2 Each of the above planning considerations is addressed below.

1. Principle of the Proposed Development

The proposals include the demolition of the former golf centre buildings and construction of a new building to provide a banqueting facility to replace the existing Premier Banqueting facility in Harrow town centre to serve the multi-cultural communities of the Borough. Both fall within Use Class D2 (Assembly and Leisure).

Proposed banqueting facility: Policy

6.3 LBH policy DM35 Part C only permits proposals for new leisure and cultural development in out of centre locations where there is no harm to neighbouring residential amenity and where:

- (a) it has been demonstrated that all reasonable alternatives for the proposal have been explored in terms of scale, format, car parking provision and scope for disaggregation in the format of the proposed development;
- (b) it has been demonstrated through site search and selection that there are no appropriate in-centre sites;
- (c) it has been demonstrated through site search and selection that there are no appropriate edge-of-centre sites;

- (d) proposals over 2,500 square metres would demonstrably not harm centres within their catchment area; and
- (e) the proposal is supported by a Green Travel Plan to enhance sustainable access between the site and the town centre network.

- 6.4 LP policy 4.7 is similar to that of policy DM35 in that cultural and leisure developments should be located on sites within town centres, or, if no in-centre sites are available then sites on edge of centres that are, or can be well integrated with the existing centre and public transport. Proposals for new out of centre development will be subject to an assessment of impact.
- 6.5 LPITP policy SD7 also takes a town centre first approach, requires a sequential test to be passed for main town centre uses proposed for out of centre sites and requires an impact assessment to be undertaken for proposals for new out of centre development for leisure use not in accordance with the development plan.
- 6.6 Paragraph 86 of the NPPF requires local planning authorities to apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
- 6.7 Paragraph 89 of the NPPF requires an impact assessment to be undertaken for applications for leisure development outside town centres if the development is over a locally set floorspace threshold (or 2,500sqm of gross floorspace if there is no locally set floorspace threshold).

Assessment

- 6.8 The proposals will provide a replacement facility for Premier Banqueting (Use Class D2). As explained above, Premier Banqueting is a long established business in Harrow and has been operating from a building in Harrow town centre since 2012. The business is reliant on leasing circa 280 car parking spaces from the Council at its Peel House car park opposite the venue. The car park is to be demolished in 2021 to facilitate the Council's civic centre redevelopment and therefore the banqueting business is compelled to close at its current location and relocate to an alternative site that meets its requirements including sufficient car parking and coach drop off/parking.
- 6.9 Premier Banqueting host a wide range of events including weddings, celebratory festivals and charity functions for the multi-cultural communities of Harrow. These types of events require a venue with a specific capacity and higher than normal floor to ceiling height to enable the venue to be dressed along with a sufficient number of car parking spaces due to the fact that guests do not travel on public transport in all of their finery. The existing venue provides an important part of Harrow's social infrastructure that meets the needs of particular groups and communities in the Borough.
- 6.10 The proposed banqueting facility will be in an out of centre location and therefore needs to be assessed against the criteria in LBH policy DM35. As demonstrated later on in this statement, the proposed development will not result in any harm to neighbouring residential amenity in accordance with policy DM1.

- 6.11 The applicant has spent a considerable amount of time and effort in searching for a new suitable and available site (since 2015) for a replacement venue including viewing existing buildings. The applicant had a number of criteria that a new site/building was required to meet as follows:
1. **Site Location:** The site must be located in the borough of Harrow. The current venue provides a banqueting facility for the multi-cultural communities within Harrow. The applicant has spent a number of years building an established client base within Harrow. If the business was to move out of Harrow they would lose their market and established client base. The applicant also employs a number of staff that reside within the Borough, if they move out of the Borough these jobs could be lost. Local suppliers within the Borough are used including: All Seasons Fruit and Veg (HA3 6TY); Madina supermarket & Halal meat (HA1 2TY), Jenpack Limited (HA7 1NL); Makebros Ltd (HA7 1BU); Ramesh Popat (HA2 0RP); Phoenix Developments (HA1 2SP).
 2. **Site Size:** 0.6ha / 1.5+ acres (building and parking only).
 3. **Car Parking:** Minimum of 100 car parking spaces. Travel survey data from the existing venue confirms that despite the existing site being located within the town centre, guests travel by private transport (cars and coaches) and do not travel by public transport). Note that the applicant currently leases circa 280 spaces and has been flexible with this criterion.
 4. **Building / Floor area:** 1,500 sqm+ (existing buildings to have floor to ceiling height of 5m minimum for function hall).
 5. **Accessibility:** PTAL 3-6.
 6. **Location:** urban and previously developed land.
 7. **Flooding:** Not in Flood Zones 2 of 3 on the Environment Agency Flood Risk for Planning Map.
 8. **Availability:** must be available for occupation with the next 12 to 24 months. This is due to the closure of the existing facility in 2021.
 9. **Use Class:** D2 or B1 (subject to change of use to D2).
 10. **Sensitive Receptors / Designations**
- 6.12 The applicant undertook the search with an open mind and explored reasonable alternatives, some of which did not meet the above criteria. This includes sites that were outside of the Borough, sites that had less floorspace and existing buildings with the potential for conversion. Given that all of the separate parts of the facility (back of house, front of house, banqueting hall and car parking) are inter-related there is no scope for disaggregation in the format of the proposed development.
- 6.13 In accordance with LBH policy DM35, policies in the LP and LPITP and paragraph 86 of the NPPF, a Sequential Site Assessment (SSA) has been undertaken to identify whether there are any suitable and available alternative in-centre or edge of centre sites that could accommodate the proposed development.

- 6.14 The SSA has used the above criteria to assess: sites identified from the Council's Site Allocations DPD; sites already considered by the applicant; sites identified through property websites and discussions with local commercial estate agents. The SSA demonstrates that there are no suitable or available in-centre or edge-of-centre sites for the proposed banqueting facility.
- 6.15 The proposals are for less than 2,500 sqm of floorspace and therefore in accordance with LBH policy DM35 and paragraph 89 of the NPPF an assessment of impact on local centres is not required.
- 6.16 However, it must be noted that there is a lack of similar banqueting facilities in Harrow, with only three other banqueting facilities in Harrow that can accommodate at least 400 guests seated (**Appendix 2**). The proposed banqueting facility is a replacement facility and is therefore not considered to have an impact on any local or town centres. Furthermore, the nature of the banqueting facility is that guests make a single trip to that venue; they will not make linked trips to shops, services or other town centre uses. On the basis of the above, the proposed development is not considered to result in an adverse impacts on Harrow town centre or other local / district centres.
- 6.17 The existing banqueting facility does not have a Green Travel Plan. The proposal is supported by a Green Travel Plan that can be secured by a s.106 agreement to enhance sustainable travel to the site and the town centre.
- 6.18 The above demonstrates that the proposal is compliant with LBH policy DM35, LP policy 4.7, LPITP policy SD and paragraphs 86 and 89 of the NPPF. The proposed banqueting facility will provide a number of environmental, social and economic benefits which are set out in this statement. As such the use of the site for a banqueting facility is considered to be acceptable.

Former golf centre: Policy

- 6.19 LBH CS 1(G) supports public access to sport and recreation facilities. LBH policy DM47 permits the loss of an existing community or sports facility if: there is no longer a need for that facility or there are adequate similar facilities within walking distance offering equivalent provision or the redevelopment of the site would secure an over-riding public benefit (our emphasis).
- 6.20 LP policy 3.19 resists the loss of sports and recreation facilities. LPTIP policy S5 seeks to retain sports and recreational land unless an assessment clearly shows the sports and recreational land or facilities to be surplus to requirements or the loss would be replaced by better provision or the development is for alternative sports and recreational provision, the benefits of which outweigh the loss of the use.
- 6.21 Paragraph 83 of the NPPF advises that planning decisions should seek to retain sports venues. Paragraph 97 advises that existing sports and recreational buildings and land, should not be built on unless: the building or land is surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

Assessment

- 6.22 The lawful use of the site is as a golf centre (Use Class D2) with a club house/shop, 9 hole 3 par golf course and driving range. The driving range closed in 2019 and the remainder of the golf operation in early 2020 as neither were viable.
- 6.23 Evidence from the planning application documentation for previous proposals on the application site for the conversion of the driving range/golf shop to nine self-contained dwellings and replacement golf reception building (LBH refs: P/1525/17 and 19/2630/19) indicates that the two previous tenants of the golf shop collected the fees and managed the operation of the driving range. Both previous tenants were major operators but were unable to make the golf shop at the site profitable. Despite a rent reduction the golf shop business was no longer commercially viable. The previous operators were also competing against nearby operators which offered a wider range of facilities.
- 6.24 The Inspector when assessing the original proposals at appeal considered the potential impact of the closure of the driving range for the provision of outdoor sports facilities (**Appendix 1**). She accepted the evidence from the appellant that the operation of the site had been affected by its narrower range of facilities and a general downturn in golf activities and spending (paragraph 22). The Inspector considered in paragraph 23:
- “I have no evidence before me to suggest that the local area is otherwise deficit in sports facilities. Therefore I cannot conclude that a reduction in the level of provision at the appeal site as proposed would have significant implications for the availability of sports facilities in the area.”*
- 6.25 Although dated the Harrow Outdoor Sports Strategy (July 2012) provides an analysis of the supply and demand for outdoor sports facilities in the Borough and indicates where shortfalls exist. It looked at facilities that were available for community use. The Strategy does not cover golf and does not identify any golf clubs / centres suggesting that golf clubs / centres in and around the Borough were all private clubs that charge a fee and were therefore not accessible to large sections of the community. The study included results from the Active People Study 2009 which indicated that only 2.97% of the population of Harrow participated in playing golf. The fact that the study does not include golf provision indicates that there is not considered to be a need for golf facilities in the Borough, as indicated by the Inspector in the appeal decision. The re-use of the site of the golf centre building and golf course as part of the proposed redevelopment of the site for a banqueting facility would therefore not result in the loss of an important sports facility in the Borough in accordance with policy DM47.
- 6.26 Even though there is clearly not an identified need for the Golf Centre in the Borough, an assessment of similar facilities has been undertaken (driving ranges and golf courses). The assessment at **Appendix 4** demonstrates that there are 16 golf courses within a five mile radius of the site. Of these five have driving ranges. There are 7 driving ranges within a five mile radius of the site and one under development.

6.27 These centres and courses all have better provision than the former golf centre at the application site. Whilst policy DM47 expects similar facilities to be in walking distance, given the particular nature of golf in terms of the amount of equipment required it unlikely that participants would walk to such a facility. This was the conclusion in paragraph 23 of the Inspector's decision when assessing the proposals for conversion of the building to nine flats.

“A number of the nearby facilities referred to, all of which are within around 6.5km of the site, have driving ranges. These are not within walking distance, as referred to in Policy DM 47 of the Harrow Development Management Policies Document (the DMP). However, given the particular nature of golf in terms of the amount of equipment required, I find it highly unlikely that most participants would walk to such a facility.”

6.28 The Inspector concluded that the proposal would not conflict with policy CS 1(G) of the Core Strategy or policy DM47 due to the fact that there was no longer a need for the facility or there are adequate similar facilities which offer equivalent provision.

6.29 The above demonstrates that golf is not considered to be a sport in the Borough where there is a deficit in facilities and there are a number of better equipped alternative centres within five miles of the application site.

6.30 The banqueting facility will continue a Use Class D2 recreational use on the site, offering an alternative recreational provision and furthermore, as demonstrated below will secure substantial environmental, social and economic benefits for the site than the existing situation.

6.31 The principle of the proposed banqueting facility is therefore considered to be acceptable and the scheme is compliant with LBH policies CF 1(G), DM46, DM47, LP policies 3.1, 3.16, 3.19, LPITP policies GG1, S1 and S5 and paragraphs 87 and 93 of the NPPF, in that the proposals will not result in the loss of a facility for which there is a deficit, there are a number of alternative facilities within a short distance of the application site and the proposed development will deliver a number of benefits.

2. Green Belt

6.32 The application site is located within the Green Belt as shown on the Adopted Proposals Map. An assessment of the proposed development against Green Belt policy is set out below.

Green Belt policy

6.33 Chapter 13 of the NPPF sets out Government policy in relation to Green Belt. Paragraph 133 confirms the great importance of Green Belts to the Government. *“The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”*

6.34 Paragraph 134 of the NPPF sets out the five purposes of the Green Belt:

- (a) to check the unrestricted sprawl of large built-up areas;
- (b) to prevent neighbouring towns merging into one another;
- (c) to assist in safeguarding the countryside from encroachment;
- (d) to preserve the setting and special character of historic towns; and

- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 6.35 Paragraph 143 advises that: *“Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.”*
- 6.36 Paragraph 145 regards the construction of new buildings as inappropriate in the Green Belt, with exceptions that include:
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces (d); and
 - the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development (g).
- 6.37 The NPPF defines previously developed land as:
- “Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.”*
- 6.38 LBH policy CS 1(F) advises that the quantity and quality of the Green Belt shall not be eroded by inappropriate uses or insensitive development.
- 6.39 LBH Policy DM 16 pre-dates the NPPF. Part A supports the redevelopment or infilling of previously developed sites in the Green Belt where the proposal would not have a greater impact on the openness of the Green Belt, and the purposes of including land within it, than the existing development having regard to the following criteria:
- (a) the height of the existing buildings on the site;
 - (b) the proportion of the site that is already developed,
 - (c) the footprint and the distribution and character of existing buildings.
- 6.40 Part B of the policy advises that proposals for redevelopment or infilling of previously developed sites in the Green Belt will also be required to have regard to visual amenity and character of the Green Belt.
- 6.41 Part C of the policy requires proposals for partial infilling or redevelopment of previously developed sites within the Green Belt to be put forward in the context of a comprehensive, long term plan(s) for the site as a whole.
- 6.42 Part D repeats policy in the NPPF that proposals that would harm the Green Belt or cause other harm will be refused in the absence of clearly demonstrated very special circumstances.

- 6.43 LP policy 7.16 repeats policy in the NPPF and advises that development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance. LPITP also repeats national guidance advising that the Green Belt should be protected from inappropriate development.

Assessment

- 6.44 For the purposes of assessing the proposed development, it is considered that paragraph 145 of the NPPF criteria (d) and (g) are relevant, that the proposed development is not inappropriate development in the Green Belt, is not harmful to the Green Belt and is therefore acceptable.
- 6.45 The former golf centre/driving range and golf course that is now closed was in Use Class D2. There was officer understanding at the first pre-application meeting that both the former Golf Centre and the proposed banqueting facility were Class D2 uses and that the proposal was simply / strictly for the relocation of the existing banqueting facility and no other uses such as conferencing.
- 6.46 Unfortunately the former golf centre was subject to a fire as a result on anti-social behaviour on the site during the COVID-19 lockdown period and the majority of the building has been destroyed. Prior to this there had been a significant amount of pre-application discussion with senior officers at Harrow Council and technical assessment work carried out as demonstrated in this statement and other technical reports that support this application. Discussions with the Head of Development Management post the fire, confirmed that officers would continue to consider the scheme on the basis of the existence of the former building despite the recent fire.

Existing site

- 6.47 Prior to the fire the application site contained the former main golf club building, ancillary buildings a hard surfaced car park (c. 95 cars) and other areas of hardstanding as shown in the arial photograph in Figure 1 and page 1 of the DAS along with the photographs in Section 2.0 of the DAS.
- 6.48 Until recently the site had been used as a driving range/golf centre and the land was occupied by the golf centre and other ancillary buildings that were permanent structures along with areas of hardstanding such as the car park. The built development and surrounding hardstanding therefore constitutes previously developed land as defined in the NPPF and as confirmed by the Inspector in the recent appeal decision (paragraph 11). The footprint and floorspace areas along with heights of the former building and the total existing amount of hardstanding is presented on pages 41 and 42 of the DAS and repeated in Tables 1 to 3 below for ease of reference.

Proposals

- 6.49 The proposal involves the construction of a new banqueting facility on broadly the same footprint as the former golf club building and all within the area of previously developed land as agreed with officers at LBH. The areas of existing hardstanding to the west of the driving range wing and the putting green are to be removed. New areas of hardstanding include part of the staff car parking area; the passing area for coaches and the widening of the vehicular access (although much of that is on highway land). Details of the proposed footprint, floorspace, heights of the new building and areas of hardstanding along with a comparison with the existing situation are presented on pages 41 and 42 of the DAS and repeated in Tables 1 and 3 below for ease of reference.

Existing Golf Clubhouse		Proposed Wedding Venue	Increase (%)
Footprint	850 sqm	1,108 sqm	30%
Floorspace	1,308 sqm	1,458 sqm	11%
Volume	4,859 cubm	6,300 cubm	30%
1. Roof Datum level	106.450	106.055	0.4m Reduction
2. Existing Eaves / Banqueting	103.520	103.100	0.42m Reduction
3. Existing Lower Ridge / Eaves	102.390	102.675	0.28m Increase
4. Existing Lower Eaves / Eaves	100.670	100.600	0.07m Reduction

Table 1: Existing and Proposed Footprint, Floorspace, Volume and Heights (Source: Page 41 of the DAS)

Existing total area of hardstanding	Existing area of hardstanding returned to non-hardstanding	Existing area of total hardstanding remaining as hardstanding
3,866sqm	732sqm	3,134sqm

Table 2: Existing area of hardstanding and area of hardstanding to be removed (Source: Page 42 of the DAS)

Proposed New hardstanding	Existing hardstanding remaining	Total hardstanding	Percentage difference
575sqm	3,134sqm	3,709sqm	4% Reduction in hardstanding

Table 3: Comparison of Existing and Proposed total areas of hardstanding (Source: Page 42 of the DAS)

Paragraph 145 (d) of the NPPF: The replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces

- 6.50 The former building was a golf centre (Use Class D2) and the proposed development involves the replacement of the former building with a banqueting facility that falls within the same use (Use Class D2) and is therefore compliant with the first part of the test.

- 6.51 As demonstrated in Table 1 above the proposed new building is not materially larger than the one that it replaces. The proposed footprint and volume of the new building is 30% larger than the previous building. Officers at LBH agreed during pre-application consultation that such an increase would not result in a building materially larger than the former building. The main reason for this increase in footprint is due to the nature of the operations of the banqueting facility which requires guests to be seated in one room and the ancillary areas serving that room such as kitchen, toilets etc to also be located on the same floor. The building has been designed with some additional reception space on the first floor to reduce the overall footprint of the building but has consequently increased the overall volume but within the accepted parameters.
- 6.52 The proposed total floorspace is only 11% greater than the floorspace of the previous building. In terms of height there is an overall reduction of 0.4m at the highest point of the building from the former building which accords with LBH policy DM16 (a) Green Belt policy criteria.
- 6.53 The proposed building will therefore not be materially larger than the one it replaces and complies with the second part of the test. It meets the criteria in paragraph 145(d) of the NPPF, does not constitute inappropriate development in the Green Belt and therefore causes no material harm to the Green Belt.
- Paragraph 145 (g) of the NPPF: The partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development*
- 6.54 The proposed development involves the redevelopment of previously developed land as confirmed by officers and the Inspector in the previous appeal decision. The proposal involves the demolition of the remaining parts of the golf club buildings and construction of a new building. The car parking area and access will remain as existing.
- 6.55 Compliance with the test in the first indent of Paragraph 145(g) is required to be demonstrated. The test requires that the partial or complete redevelopment should not have a greater impact on the openness of the Green Belt than the existing development.
- 6.56 The Courts have acknowledged that the assessment of impact on the Green Belt is a matter for the decision maker. It has a spatial and visual dimension. The former in accordance with LBH policy DM16 involves having regard to the height of existing buildings on site, the proportion of the site that is already developed and the footprint and distribution of existing buildings and making a comparison with the proposed buildings.
- 6.57 As shown in Table 1 above and as illustrated on page 41 of the DAS the maximum height of the proposed building (the proposed front of house element of the building) decreases by 0.4m over the maximum height of the former golf centre / driving range building. The maximum height of the banqueting hall and the ridge height of the back of house building is lower in height than the eaves of the former golf centre / driving range building and the eaves height of the back of house building is lower than the eaves of the single storey element of the former wings of the driving range building in accordance with LBH policy DM16 (a) Green Belt policy criteria.

- 6.58 The proportion of the site that is already developed, based on the total area of previously developed land (car park, existing building footprint and raised terrace, driving range and wings, substation, ancillary building, bunker behind the building, gravel strip adjacent to main building) is 8.47% (5,894sqm of previously developed land and a site area of 69,625sqm). The proposed development involves a total of 4,817sqm of developed land (building footprint and hardstanding) and the proportion of the site that will be developed is 6.92%, a reduction of 1.82% over the existing situation. The proposed development will therefore reduce the overall proportion of the site that is developed in accordance with LBH policy DM16 (b) Green Belt policy criteria.
- 6.59 As demonstrated on page 42 of the DAS there will also be a reduction in hardstanding on the site of 4% over the existing situation.
- 6.60 The footprint and volume of the proposed building would be 30% greater than that of the existing building, however the new building will be sited on the footprint of the former building and previously developed land. The form of the proposed building is more compact than the former building with the omission of the two long east / west wings of the existing building and the siting of the building closer to the car park and away from the undeveloped land to the north. Outbuildings and containers will also be removed along with the fencing, netting and pylons with the floodlights. The distribution of the proposed banqueting facility compared with the existing building and other ancillary buildings / structures would result in an improved distribution of built footprint in accordance with LBH policy DM16 (c) of the Green Belt policy criteria.
- 6.61 In spatial terms, the proposed development would decrease in site coverage and the amount of hardstanding compared with the former development; would increase in terms of footprint but condensed into a more compact form with a more sensitively designed building integrated into the surrounding landscape along with the removal of other ancillary buildings and structures. This is demonstrated visually on pages 34 and 40 of the DAS. The comparative analysis of the spatial dimension proposed is therefore considered to be acceptable.
- 6.62 In visual terms, this involves having regard to the distribution and character of existing buildings in accordance with LBH policy DM16. A detailed assessment of the proposal in visual terms is set out in the Landscape and Visual Appraisal (LVA).
- 6.63 The visual effects of the proposed development need to be considered in the existing context of the site which includes the presence of existing areas of built form and hard standing, as well as the presence of fencing, netting and lighting associated with the former driving range.
- 6.64 The former building had two wings that extended to the east and west from the main hub of golf centre building. As set out in the LVA the open nature of the site and the exposed edge of the existing building when viewed from the upper slopes within the site itself impacts on the openness of the Green Belt along with the fencing, netting and lighting on the wider site. When viewed internally from the north of the site the building is a pronounced feature with no transitional landscaping or planting.
- 6.65 As illustrated in the LVA the areas of hardstanding on the southern part of the site can be seen from the entrance and reduce the sense of openness. Walling and timber fencing found around the former building added to the developed nature of the southern part of the site and reduced its openness.

- 6.66 The proposals limit development to previously developed land on the southern part of the site, allowing for the retention of the existing undeveloped wider golf course and boundary planting that will remain undeveloped. The existing access point off Brockley Hill has been retained and incorporated into the proposals.
- 6.67 The removal of the 'wings' of the building and replacement with a more compact building, with natural materials and a ballasted roof will reduce the impact of the building on openness from the previous building and result in an enhancement to the openness of the Green Belt. The proposed building is lower in height than the existing building, sits below the existing skyline and underneath the tree line which will also reduce the potential impact on openness. The tallest part of the building has been sited further towards the car parking area than the existing building further away from the undeveloped land to the north. A reduction in the sprawling form and massing across the site will enable the built form to be contained on a more compact footprint and will reduce the impact on openness from the former building on the site.
- 6.68 The proposal will result in improvements in openness from views to the north. There are also opportunities to incorporate additional native tree planting to integrate the building into the landscape as well as providing biodiversity benefits. The retention of undeveloped areas within the site provide opportunities for additional characteristic planting, new areas of tree planting and additional ecological habitats.
- 6.69 Existing detracting features found within the site in the form of netting, lighting and fencing associated with the driving range will be removed as part of the proposals and this will be beneficial. This was confirmed by the Inspector for the previous appeal (**Appendix 1**) who confirmed that the removal of the fencing and lights will significantly benefit the openness of this part of the Green Belt in paragraph 16 of her decision:
- “The removal of the high driving range fence, and the tall metal pylons which support it, would further enhance the openness of the Green Belt.”*
- 6.70 The LVA advises that views of the site are localised and limited. No middle or long distance views of the site are possible due to the heavily wooded surrounding landscape and rising topography to the north of the site. The only views of the site are along Brockley Hill. These views are limited to glimpsed views that can be seen through gaps in the boundary planting at the eastern boundary along Brockley Hill close to the entrance into the site.
- 6.71 Development of the site will be visible to transient users of Brockley Hill, who already experience glimpsed views of the existing building found within the site through gaps in existing tree planting found along Brockley Hill. The development will have a beneficial effect on the visual amenity of these receptors.
- 6.72 In accordance with LBH policy DM16, the development provides a comprehensive long term plan for the site that includes enhancements to the landscape and biodiversity of the site that will be managed through a Landscape Management Plan.

6.73 The proposed redevelopment of the site will not result in a greater impact on the openness of the Green Belt than the former buildings and structures on the site and it is considered that the proposed development will enhance the openness of this part of the Green Belt in comparison with the Golf Centre building. It is considered that the proposed development would therefore not materially harm the character and openness of this part of the Green Belt.

6.74 The proposal is considered acceptable in terms of the spatial and visual impacts on the openness of the Green Belt and is compliant with paragraph 145 (g) of the NPPF and therefore does not constitute inappropriate development in the Green Belt.

Purposes of including land within the Green Belt

6.75 Although the proposed building will have a marginal increase in floorspace, the additional floorspace would not introduce development onto this site of a scale considered to conflict with the aims of preserving the openness of the Green Belt.

6.76 The proposed development does not conflict with the purposes of including land within the Green Belt as set out in para.134 of the NPPF. The proposal is considered in the context of each of these criterion.

- (a) **To check the unrestricted sprawl of large built-up areas:** The site is surrounded by a golf course and the boundaries of the wider site are occupied by mature trees and vegetation. The proposed building will sit on the footprint of previously developed land sited away from the site boundaries. There is therefore no physical connection between the area of land proposed for development and any large built-up areas.
- (b) **to prevent neighbouring towns merging into one another.** The lack of connection between the area of land proposed for development and any large built-up areas would prevent this happening.
- (c) **to assist in safeguarding the countryside from encroachment:** Some encroachment is long established through the operational golf club house building, golf course and driving range including the large fencing. The replacement building will not encroach into the surrounding countryside.
- (d) **to preserve the setting and special character of historic towns:** Not relevant.
- (e) **to assist in urban regeneration, by encouraging the recycling of derelict and other urban land:** The site is already in D2 use which is not changing. As demonstrated by the SSA there are no suitable and available alternative sites in Harrow on urban land. The proposed scheme would not prejudice the recycling of derelict and other urban land.

6.77 It is therefore considered that the proposed development is not inappropriate development in the Green Belt as:

- in accordance with criteria (d) of paragraph 145 of the NPPF, the proposed banqueting facility continues the D2 use and is not a materially larger building than the one it replaces;

- in accordance with criteria (g) of paragraph 145 of the NPPF, the proposal involves the complete redevelopment of previously developed land which as set out above would not have a greater impact on the openness of the Green Belt than the existing development.

6.78 The current proposal would therefore not conflict with the purposes of including the land within the Green Belt.

6.79 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

Design policy

6.80 LBH Policy CS1 B requires development to respond positively to the local context in terms of design, siting and spacing and reinforce the positive attributes of local distinctiveness whilst promoting innovative design and/or enhancing areas of poor design.

6.81 LBH policy DM1 requires all development to achieve a high standard of design and layout. Proposals which fail to achieve a high standard of design and layout, or which are detrimental to local character and appearance, will be resisted.

6.82 The assessment of the design and layout of proposals will have regard to the following criteria:

- a) the massing, bulk, scale and height of proposed buildings in relation to the location, the surroundings and any impact on neighbouring occupiers;
- b) the appearance of proposed buildings, including but not limited to architectural inspiration, detailing, roof form, materials and colour, entrances, windows and the discreet accommodation of external services;
- c) the context provided by neighbouring buildings and the local character and pattern of development;
- d) the provision of appropriate space around buildings for setting and landscaping, as a resource for occupiers and to secure privacy and amenity;
- e) the need to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit;
- f) the functionality of the development including but not limited to the convenience and safety of internal circulation, parking and servicing (without dominating the appearance of the development) and the appearance, capacity, convenience, logistics and potential nuisance of arrangements for waste, recycling and composting; and
- g) the arrangements for safe, sustainable and inclusive access and movement to and within the site.

6.83 LP policy 7.2 requires all new development in London to achieve the highest standards of accessible and inclusive design. Design and Access Statements should demonstrate how the principles of inclusive design have been integrated into the proposed development. LPITP policy D5 repeats much of LP policy 7.2.

- 6.84 LP policy 7.4 replicates much of LBH policy DM1 in that development should have regard to the character of the area and provide a high quality design response that contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area.
- 6.85 LP policy 7.6 requires architecture to make a positive contribution to a coherent public realm and incorporate the highest quality materials and design appropriate to its context.
- 6.86 LP policy 5.3 requires major development proposals to meet the minimum standards outlined in the Mayor's Supplementary Planning Guidance and this should be clearly demonstrated within a Design and Access Statement. This includes the following sustainable design principles: efficient use of natural resources (including water), including making the most of natural systems both within and around buildings; minimising the generation of waste and maximising reuse or recycling; ensuring developments are comfortable and secure for users, including avoiding the creation of adverse local climatic conditions.
- 6.87 LPITP policy D3 requires development to make the best use of land by following a design led approach that optimises the capacity of sites. This approach requires a consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth. Development proposals should meet a number of criteria including: enhancing local context; facilitate sufficient servicing and maintenance; achieve indoor and outdoor environments that are comfortable and inviting for people to use; be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well; and aim for high sustainability standards.
- 6.88 LPITP policy D4 requires the design of development proposals to be thoroughly scrutinised by borough planning, urban design, and conservation officers. Boroughs and applicants should make use of the design review process to assess and inform design options early in the planning process.

Assessment

- 6.89 As set out in detail in section 4.0 of this Statement the design of the proposed building has been through a number of iterations in response to comments from LBH officers and the LBH Design Review Panel.

Siting

- 6.90 The design led approach has sought to optimise the capacity of the site through directing built development to the footprint of the previously developed land on site. The building line of the southern elevation was pushed further south towards the car park better utilising the previously developed land.
- 6.91 The removal of the wings of the former building and the compact nature of the design has enhanced the openness of the Green Belt over the previous Golf Centre building.

Layout

- 6.92 From the outset of the design process, the brief from the applicant to the architect was to design a building that operationally would work as a banqueting facility as well as being sympathetic to the Green Belt. The applicant is highly experienced in the operation of a banqueting facility and understands how these types of facilities function internally within a building in terms of the relationship between front and back of house facilities.
- 6.93 The original design concept which has been maintained through to the final design involves three functional areas within the building: front of house; back of house and the banqueting hall as explained in more detail in Section 4.0 of the DAS.
- 6.94 At the ground floor the front of house area contains the main entrance, cloakroom, w/c's, internal staircase and lift to the first floor. From the front entrance guests will be able to walk through to a reception room at the south / west corner of the building via a processional route (as recommended by the DRP and illustrated further at section 5.11 of the DAS). This will open out onto an outdoor reception space with a secret garden, making best use of this aspect and integrating the building into the landscape (see Figure 11 below).



Figure 11: Image of the reception room to the south west of the proposed building and secret garden taken from the DAS

- 6.95 To the north of the front of house building is the banqueting hall with views out to the north and west and doors to the outside area further integrating the building within the landscape. The back of house area is to the east facing Brockley Hill and contains the kitchen, stores and staff facilities with a service area to the rear. There are corridors on the south and east side of the banqueting hall to enable servers to enter the hall at the same time with easy access to and from the kitchen.
- 6.96 At first floor level is a secondary function room with a staircase from the reception area outside and a balcony overlooking the surrounding landscape and Stanmore Country Park. The first floor also contains ancillary space for meeting rooms/administration functions and a bridal suite.
- 6.97 Externally, the car parking area will remain as existing with the removal of several spaces to facilitate coach/refuse vehicle turning. A dedicated area will be provided for coach and bridal party drop offs. The service area will be screened and a processional route has been created from the drop off point into the building and reception area.
- 6.98 The space around the building will be subject to a new landscape strategy and design (further details below) which seek to create a more positive relationship between the building and the landscape than the previous building.
- 6.99 The layout therefore provides a ceremonial professional route and enjoyable spaces for guests along with functionality as it provides clear circulation routes for staff serving the banqueting hall. Further details of the proposed layout of the site and building are contained within the DAS.

Massing, bulk, scale and height

- 6.100 As demonstrated above and illustrated in the DAS, the building has been designed to have a more compact form than the previous building.
- 6.101 The maximum height of the proposed building is less than the maximum height of the previous building and as shown in Table 1 above and other parts of the building have a lower comparable height than the previous building.
- 6.102 The banqueting hall has a floor to ceiling height of circa 5m. This is necessary to accommodate the number of people within the hall and enables wedding parties to decorate the venue which is a central part of the celebrations at some events.
- 6.103 As is demonstrated in the LVA the site is only visible to transient users of Brockley Hill, who already experience glimpsed views of the existing building found within the site through gaps in existing tree planting found along Brockley Hill.

Appearance

- 6.104 The appearance of the building is a simple modern take on a barn building. Following feedback from the DRP, the proposed pallet of materials was refined so that the building appears as a cohesive building with three forms but a single pallet of materials. Natural materials have been selected to blend in with the semi-rural setting and details of these are provided in the DAS. An image of the proposed building taken from the DAS is provided in Figure 12 below.
- 6.105 To enable the banqueting hall to be devoid of columns, the roof of the banqueting hall will comprise of a light material.

- 6.106 External services will predominantly be limited to the back of house area. Solar panels will be included on the roof of this part of the building. It is intended that all plant equipment will be located in the roof of the back of house area.



Figure 12: Image of the front of the proposed building with processional route into the building (as recommended by the DRP)

Inclusive design

- 6.107 The building has been designed to provide access for all members of the multi-cultural communities of Harrow include the elderly and less able. Details are provided in the DAS. As the design is developed, all aspects of accessibility will be considered and developed in accordance with both Part M of the Building Regulations and in accordance with BS8300.

DRP

- 6.108 An earlier iteration of the scheme was presented to Harrow's DRP in July 2020. Following comments from the DRP, the design team reviewed the overall design and make a number of changes in response to these comments, further details of which are provided in Section 4.0 of this Statement.

Summary

- 6.109 The proposed development has a high quality design response that has been through a number of iterations and responded to comments from officers and the DRP. The design has been developed with inputs from the consultant team including Tyler Grange who have advised on the proposed landscaping, EAS on car parking and servicing and Eight Associates whom have provided advice on Energy and Sustainability requirements.
- 6.110 The design 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.
- 6.111 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

- 6.112 LBH policy CS7 advises that development will be managed to maintain the special character and identified views of Harrow Weald Ridge.
- 6.113 LBH policy DM1 requires the assessment of the design and layout of proposals to have regard to the need to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.
- 6.114 LBH policy DM3 seeks to protect views identified in Schedule 3. These views will be safeguarded in accordance with the Harrow Views Assessment (2012) and the London Views Management Framework.
- 6.115 LBH policy DM6 advises that proposals affecting an area of special character will be considered having regard to: a. the impact of the proposal upon the strategic value of the area of special character; b. the desirability of preserving or enhancing the environmental, architectural, historic and landscape features that contribute to the area of special character; c. the protected views to and from areas of special character.
- 6.116 LBH policy DM22 requires development proposal to include hard and soft landscaping that: is appropriate to the character of the area; is well laid out in terms of access, car parking; achieves a suitable visual setting for the building(s); provides for sufficient space for new or existing trees and planting to grow; and supports biodiversity.
- 6.117 LP policy 7.4 requires development to have regard to the form and structure of an area and improve an area's visual development. Buildings should provide a high quality design response that contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area.
- 6.118 LP policy 5.10 requires development proposals to integrate green infrastructure from the beginning of the design process to contribute to urban greening. LPITP policy G5 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high quality landscaping (including trees), green walls and nature-based sustainable drainage.

Assessment

- 6.119 A Landscape and Visual Appraisal (LVA) has been undertaken by Tyler Grange to appraise the potential landscape and visual effects associated with the proposed development.
- 6.120 The assessment confirms that the presence of the club house building, areas of hardstanding, car parking, netting, fencing and lighting associated with the golf course are detracting features in the landscape and give the site peri-urban characteristics. The site shares some characteristics with the published landscape character assessment, with mature tree planting a common feature along the site boundaries and along the skyline, and long ranging views across the south from the upper slopes within the site.
- 6.121 The site is located within the Harrow Weald Ridge Area of Special Character. This is an area of higher ground that contributes to creating an elevated horizon of tree cover and open countryside important as a visual reminder that Harrow is an outer London Borough, a transition between highly urbanised characteristics of inner London and the rural character beyond.
- 6.122 The LVA advises that the site is not identified as containing a protected view or forming part of a protected view. The development of the site will not impact on the viewpoint at Wood Farm identified in the Harrow Views Assessment. The LVA concludes that the development of the site will not impact on the identified views within the Harrow Views Assessment, or impact on its special characteristics, with retention of all tree planting and the proposed development sitting below the skyline against the existing wooded backdrop.
- 6.123 Effects on the landscape character as a result of the proposed development are negligible, with all existing landscape features retained and the proposed building retained on the existing footprint with proposals to include additional tree planting, ecological enhancements, SUDS, wildflower meadow planting and proposed landscaping to integrate the building and provide benefits to biodiversity and amenity.
- 6.124 The proposed Landscape Strategy (Figure 13) has been an integral part of the design process with proposals to incorporate green infrastructure into the overall design from the start of the process. The proposed development 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 the southern part of the site characteristic of the LCA, proposed mounding and landscape to the north of the building to integrate the building into the landscape; retention of the trees within the car park; proposed SUDS pond utilising the existing ditch and providing biodiversity enhancement; and proposed ecological enhancements alongside Stanmore Country Park, Pear Tree Wood and Brockley Hill boundaries to provide buffer and enhanced landscape and ecological features. The additional tree planting and soft landscaping achieve a suitable visual setting for the building and supports biodiversity.



Figure 13: Extract from Proposed Landscape Strategy Plan (Tyler Grange)

6.125 The Landscape Strategy also picks up on recommendations from the DRP to integrate the proposed building into the landscape and to create a series of memory points or scenes within the landscape for wedding photography as is shown on the Plan prepared by Tyler Grange included at 4.14 in the DAS with an extract shown at Figure 14 below.



Figure 14: Extract from 'Memory Points within the Landscape' Plan, prepared by Tyler Grange

- 6.126 The LVA concludes that the extent of views into the site are limited and localised with the only available views from Brockley Hill to the east of the site. The presence of build form located in the wider landscape limits visibility and the presence of mature tree planting found to the site boundaries reduces the visibility and provide the site with a well contained and enclosed character, separating it from the wider landscape. Development of the site will only be visible to transient users of Brockley Hill who already experience glimpsed views of the existing building through gaps in tree planting along Brockley Hill. The development with the replacement building with a higher quality of design, the removal of netting, fencing and lighting around the driving range and additional planting will have a beneficial effect on the visual amenity of these receptors.
- 6.127 The LVA concludes that overall the development of the land at Brockley Hill will not cause undue harm to the landscape character and visual amenity of the site. 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

Policy

- 6.128 Policy DM22 advises that the removal of trees subject to TPOs or assessed as being of significant amenity value will only be considered acceptable where it can be demonstrated that the loss of the tree(s) is outweighed by the wider public benefits of the proposal. The Council will require trees identified for retention to be protected during construction and to be retained or replaced where necessary following the completion of the development.
- 6.129 LP policy 7.21 advises that existing trees of value should be retained and any loss as the result of development should be replaced. Where appropriate, the planting of additional trees should be included in new developments. LPITP policy G7 is similar to the adopted policy but advises that the planting of additional trees should generally be included in new developments.
- 6.130 NPPF paragraph 170 requires planning decisions to contribute to and enhance the natural and local environment by recognising the benefits of trees.

Assessment

- 6.131 An Arboricultural Report (AR) has been prepared by Dave Clarke, Chartered Landscape Architect. This includes a Tree Survey, Arboricultural Impact Assessment (AIA) and an Arboricultural Method Statement (AMS).
- 6.132 Two trees are recommended for removal irrespective of the proposed development: a dead birch tree within G7; and a willow (part of G6) which has started to split apart and presents a potential risk to users of the adjacent car park. It is recommended that the tree is further assessed at the earliest opportunity to assess its stability and structural integrity to guide the future management of this tree: either a significant canopy reduction to remove weight loading on the weakened area or the removal / 'coppicing' of the tree and the planting of a suitable replacement. Several trees within G8 have damage to trunks and limbs that may affect their long term viability and the condition of these trees should be monitored.
- 6.133 Trees within a group (G5) will need to be removed, or are proposed to be removed to implement the development. This relates to the implementation of the SuDs pond within the site. The AR advises that these trees 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.
- 6.134 Incursions within the RPAs have been assessed to either have a minimal and insignificant impact on retained trees or can be reduced to an insignificant level through the use of relevant construction techniques. These are set out within the AMS. These will ensure that the development will be completed without having any undue impact on retained trees.

- 6.135 Retained trees will be protected during the site development. The AR sets out how protection and retention of trees will be achieved. The effect on trees from the proposals will be minimal given the proposed site layout and conditions and providing that the AMS is implemented.
- 6.136 The AR concludes that the development is therefore 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

Policy

- 6.137 LBH policy CS1 (E) advises that where appropriate, development should seek to promote and enhance biodiversity in accordance with the aims of the Harrow Biodiversity Action Plan and best practice.
- 6.138 LBH policy DM20 requires the design and layout of new development to retain and enhance any significant existing features of biodiversity value within the site. Potential impacts on biodiversity should be avoided or appropriate mitigation sought.
- 6.139 LBH policy DM21 seeks opportunities to enhance locally important habitats and to support locally important species. Where possible, proposals should secure the restoration and re-creation of significant components of the natural environment as part of the design and layout of development. This includes planting for wildlife, green roofs and green walls, landscaping including trees and ponds and habitat creation such as nesting and roosting boxes.
- 6.140 LP policy 7.19 requires development proposals wherever possible to make a positive contribution to the protection, enhancement, creation and management of biodiversity. On Sites of Importance for Nature Conservation development proposals should give sites of borough and local importance for nature conservation the level of protection commensurate with their importance.
- 6.141 LPITP policy G6 adds that proposals should aim to secure biodiversity net gain and that this should be informed by the best available ecological information and addressed from the start of the development process.
- 6.142 One of the environmental objectives in the NPPF is to improve biodiversity (paragraph 8). Planning decisions should contribute to and enhance the environment by minimising impacts on and providing net gains for biodiversity (paragraph 170). When determining planning applications opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity (paragraph 175).

Assessment

- 6.143 An Ecological Assessment has been undertaken by Tyler Grange. This sets out the findings of a Phase 1 habitat survey and desk study, Habitat Suitability Index Assessment (HSI), Preliminary Bat Roost Assessment (PBRA), bat emergence survey and biodiversity net gain.

- 6.144 The majority of the habitats on site are proposed to be retained and enhanced as part of the proposals. Those habitats that are being lost to the development are mostly of negligible ecological importance and require no specific mitigation (building and hardstanding, sand bunkers, gravel and introduced shrub). Those habitats of ecological importance within the site only that are proposed to be subject to some habitat loss (poor semi-improved grassland and beech hedgerow) will be more than mitigated through the proposed habitat creation and enhancements to the wider former golf course. These enhancements will achieve a net gain of +20.98% habitat units and 10.58% hedgerow units and will improve the habitat diversity onsite and will establish a mosaic of habitats that will provide a range of nesting, foraging and commuting opportunities for species such as bats, birds, badger, reptiles, amphibians and hedgehogs.
- 6.145 Species specific enhancements such as the incorporation of a new pond, bat and bird boxes and hibernacula will increase sheltering, roosting, nesting, and hibernation opportunities. Harrow BAP species such as bats, hedgehogs, amphibians and reptiles will benefit from the habitat creation described above and through these enhancements.
- 6.146 The Ecological Assessment concludes 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.
- 6.147 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

Policy

- 6.148 LBH policy DM7 advises that proposals that secure the preservation and conservation of a heritage asset and its setting will be approved. When considering proposals affecting an archaeological priority area, the Council will have regard to: the known or anticipated significance of the archaeology; the likely implications of the proposal upon the archaeology; and the need to preserve the archaeology in situ; or the adequacy of arrangements for the investigation, recording, archiving and (where appropriate) curation of archaeology not requiring preservation in situ.
- 6.149 LP policy 7.8 requires development to incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology. New development should make provision for the protection of archaeological resources. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset
- 6.150 LPITP policy HC1 requires development proposals to identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation.

6.151 Paragraph 189 of the NPPF requires an archaeological desk based assessment to be submitted for sites where development is proposed that has the potential to include heritage assets with archaeological interest. When determining applications account should be taken of the desirability of sustaining and enhancing the heritage asset (paragraph 192). For non-designated heritage assets, the effect of an application on the significance of that asset should be taken into account in determining the application (paragraph 197). In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Assessment

6.152 An Archaeological Desk Based Assessment (ADBA) has been undertaken by Archaeology Collective to clarify the archaeological potential of the application site and to assess the level of impact the development proposals may have on any archaeology present.

6.153 The site does not contain any designated archaeological assets such as World Heritage Sites, scheduled monuments, protected wrecks, registered battlefields or registered parks & gardens.

6.154 The eastern boundary of the application site including the area of the proposed access widening lies within an LBH Archaeological Priority Area (APA) as shown on the adopted Proposals Map within which runs the course of the major Roman arterial road linking London with St Albans and the northwest of England.

6.155 The ADBA concludes that there is a probability that the proposals to widen the entranceway onto the modern A5 could encounter traces of the former Roman road, together with the westernmost of its flanking ditches, and possibly also Roman settlement traces or burials alongside it. There is a high potential for encountering traces of the Roman road, its western flanking ditch, and possible roadside features such as settlement remains or burials with the area of proposed access widening.

6.156 The area proposed for the passing place on the existing access road also lies within the APA and could impact upon underlying archaeological remains of the Roman road. It is possible that if the ground level has already been raised in this area for the existing access way, that this may also serve to protect the underlying remains from the proposals, or an additional area of raised ground could be added as protection. As this area of the site lies within the APA archaeological mitigation will be necessary, and this may be best done through protection of the underlying remains.

6.157 The proposed new banqueting facility building is slightly larger in its footprint than the existing clubhouse and could cause significant areas of ground disturbance through levelling and construction processes which could expose, damage or destroy archaeological remains within its footprint. The archaeological potential in this area is low to medium for Roman remains and could be dealt with through a programme of archaeological mitigation.

6.158 The potential for encountering archaeological remains of other periods is considered to be low.

6.159 The ADBA concludes that on the basis of available evidence, it is considered that the proposed development accords with current legislation, the planning policies contained within the NPPF and those local policies which relate to archaeology.

- 6.160 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

Policy

- 6.161 LBH policy DM42 advises that proposals that make on-site provision for parking will be supported where: the proposal has regard to the London Plan standards, including those with electric charging points; there would be 1 motorcycle parking space per 20 car parking spaces; and the number of cycle parking spaces meets or exceed the London Plan standards.
- 6.162 Part E of the policy requires the design and layout of parking areas to be safe, secure and fit for purpose. Access to and from the public highway should maintain and, where necessary, improve safety and give priority to the convenience of pedestrians and cyclists. Part F of the policy advises that proposals that would result in inappropriate on-site parking provision, having regard to the criteria in the policy, and those which would create significant on-street parking problems, prejudice highway safety or diminish the convenience of pedestrians and cyclists, will be resisted.
- 6.163 Policy DM43 requires proposals for major development to submit a Transport Assessment (TA) and that applicants will be required to satisfactorily mitigate any impacts identified in the Transport Assessment. Mitigation measures will be required to contribute to the desirability of achieving modal shift away from private car use and should include the preparation and implementation of Travel Plans.
- 6.164 Policy DM44 requires non-residential proposals to make arrangement for servicing that maintain or improve the safety and flow of traffic on the public highway. Proposals should make satisfactory arrangements for access to and servicing or the site during construction. Proposals that would be detrimental to safety, traffic flow and the amenity of neighbouring occupiers will be resisted.
- 6.165 LP policy 6.9 requires developments to provide secure cycle parking facilities in accordance with the minimum standards in Table 6.3 and on-site changing facilities and showers for cyclists. Policy 6.10 requires high quality pedestrian environments to be provided.
- 6.166 LP Policy 6.13 sets out maximum car parking standards and disabled car parking provision in Table 6.2. Development is required to ensure that 1 in 5 car parking spaces (both active and passive) provide an electric charging points. Developments should also provide for the needs of businesses delivery and servicing.
- 6.167 LPITP policy T1 requires development to make the most effective use of land reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes. Policy T2 requires development to demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance, reduce the dominance of vehicles on London's streets and be permeable by foot and cycle and connect to local walking and cycling networks and public transport.

- 6.168 Policy T4 requires a TA to be submitted with development proposals to ensure that the impacts on the capacity of the transport network are assessed and the TA should focus on the Health Streets Approach. Travel Plans, Parking Management Plans, Construction Logistics and Delivery and Service Plans are also required. Where required mitigation will be required to address adverse transport impacts that are identified.
- 6.169 LPTIP policy T5 sets out the minimum standards for cycle parking and policy T6 sets out policy in respect of car parking. Provision should be made for electric and passive charging points and disabled parking. A Parking Design and Management Plan should be submitted for all applications that required car parking.
- 6.170 The NPPF advises that transport issues should be considered from the earliest stages of plan-making and development proposals (paragraph 102). Whilst paragraph 103 advises that significant development should be focussed on locations which are or can be made sustainable, it is recognised that opportunities to maximise sustainable transport solutions will vary between urban and rural areas and this should be taken into account in decision making (our emphasis).
- 6.171 When assessing planning applications it should be ensured that appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; safe and suitable access to the site can be achieved for all users; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree (paragraph 108).
- 6.172 Paragraph 109 adds that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 6.173 Development proposals should give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible –facilitating access to high quality public transport; address the needs of people with disabilities; create safe and secure places minimising conflicts between pedestrians and cyclists; allow for the efficient delivery of goods and have electric charging points (paragraph 110). Travel Plans should be provided (paragraph 111).

Assessment

- 6.174 A comprehensive Transport Assessment (TA) has been prepared by EAS following pre-application meetings and discussions with Highways Officers at LBH, LBB and the GLA / TfL at the very start of the design process.
- 6.175 A review of the existing operation at Premier House was undertaken including two guest travel surveys in January 2020 for a small event with 65 guests and a larger event with 500 guests to establish the origin and mode of travel to venue. This found that coaches transported a majority of guests to and from the venue for the larger event. The smaller event did not incorporate coaches but both events saw a similar high occupancy rate for cars and taxis.

- 6.176 A review of the number of events and timings that took place in 2019 was also undertaken to establish the pattern of events and use of car parking spaces at the Peel House car park (circa 280 spaces). This concluded that the car park was used for two thirds of events and for events of around 550 guests between 80 and 100 spaces where used. A review of this information confirms that despite the existing site having a PTAL of 6a guests rarely travel to the current venue by public transport being dressed in their finery for the event and therefore this traffic is directed into the centre of Harrow.

The site

- 6.177 The site is a 1.5 km 19-minute walk, or 5-minute cycle from the Stanmore underground station. The Stanmore neighbourhood parade, a minor town centre area, is reached in a 2.1 km 26-minute walk, or 7-minute cycle from the site.
- 6.178 The site is accessed from Brockley Hill. Whilst the entirety of the application site is within LBH, the administrative border with LBB is along the centre of Brockley Hill, where the site is accessed, with this road under the jurisdiction of LBB Highways.
- 6.179 The TA advises that whilst walking and cycling is unlikely to be a serious means of access for guests, particularly for weddings, walking and cycling could be viable modes for staff.

Healthy Streets Assessment

- 6.180 In line with the Mayor's Healthy Streets Approach, an ATZ (active travel zone) Healthy Streets assessment was carried out. This involved walking from the site to a number of services and facilities, rating the walked route against the healthy streets indicators and identifying potential improvements to benefit active travel.

Proposed junction widening

- 6.181 A review of traffic flow and accident data on Brockley Hill has been undertaken and following discussions with LBB, it is proposed that the existing access into the site from Brockley Hill is redesigned to prevent right turns into the site from the north and to accommodate simultaneous ingress and egress by coaches and refuse vehicles to ensure that vehicles are not held up on Brockley Hill by vehicle movements at the site. Visibility Splays for the new access can be achieved. A Stage 1 Road Safety Audit has been carried out, which proposed 2 amendments that will be addressed post planning. The proposed access amendment will be subject to a Section 278 agreement with LB Barnet Highways.

Internal Circulation around the Site

- 6.182 The layout of the car park has been designed as to allow coaches and refuse vehicles to circulate within the site, avoiding the need for manoeuvring yet allowing forward ingress and egress, improving highway safety at the site.
- 6.183 A new footpath into the site from Brockley Hill, south of the vehicle access, will be constructed. This will separate pedestrian from vehicle movements and provide a more pleasant entry to the site and proposed venue.

Cycle Parking

- 6.184 Minimum cycle parking standards for 'other' (i.e. non-sport related) D2 uses are the same for both the LP and LPITP as 1 long-stay cycle parking space per eight FTE staff; and 1 short-stay cycle parking space per 30 seats.
- 6.185 For a maximum capacity event with 30 staff, the most that would be on site concurrently, 4 long stay spaces are required. Based on the capacity of circa 500 guests, 17 short stay cycle parking spaces are required. Realistically guests attending a wedding reception in their finery will seldom cycle. However 21 cycle spaces will be provided (4 long stay and 17 short stay) in a covered secure cycle store in line with London Plan standards. Shower and changing facilities will also be provided.

Car Parking

- 6.186 The car park currently has circa 95 spaces. There are no specific quantified car parking standards for D2 banqueting land uses in either the LP, LPITP or LBH policies, as these are treated on a case-by-case basis.
- 6.187 The various highways authorities have differing approaches to the level of car parking in Outer London Boroughs. The GLA, supported by TfL prefer to see as little car parking as possible. However, LBB as the Highways Authority will have concerns regarding overspill parking onto their network, especially Brockley Hill and would prefer greater provision to avoid this eventuality, being conscious of traffic collision.
- 6.188 Research undertaken on trip generation from the existing venue suggests that whilst for the surveyed event around 40 cars, 13 taxis and 11 coaches were involved, evidence based on the historic hire of the Peel Road car park suggests that for some events in 2019 between 80 and 100 car parking spaces were used.
- 6.189 To strike a balance between the concerns of TfL and LBB it is proposed that the car park will be designed with 84 parking space, but only 68 of these will be permanent use (62 for guests and 6 in a separate staff car park). The remaining 16 spaces located on the aisle furthest from the access (giving a total of 78 guest spaces) will be blocked off with a large planter and available if needed.
- 6.190 These additional 16 spaces will act as emergency overflow parking provision: this will ensure that any overspill parking does not occur on Brockley Hill. The presumption will be of an availability of 62 guest parking spaces (plus 6 staff spaces) which would be communicated to patrons as part of the general event travel planning process. Alternatively where coaches are used in large numbers available car parking spaces can be used for coach parking. Management of these spaces will be dealt with through discussions between management and patrons when organising.
- 6.191 17 spaces will have active and passive electric vehicle charging provision; and there will be 5 blue badge holder disabled spaces and 4 enlarged spaces. There will also be space for motorcycle parking.

Trip Generation

- 6.192 Trip generation associated with the existing use of the site was estimated using the TRICS database. Trip generation associated with the proposed use was estimated using the results of the guest travel survey.

- 6.193 The proposed redevelopment encompasses an expected net reduction in vehicle trips associated with the site. Through the proposed relocating of the venue, a high number of vehicle trips that are currently occurring in Wealdstone town centre will effectively be moved to the less congested locale. This means that overall it is likely that vehicle trips will be removed from the Wealdstone town centre area, whilst there will also be a reduction in peak and total vehicle trips associated with the site.
- 6.194 Nevertheless, the site is accessible by active and public transport which will support accessibility by staff. A footway runs along the full length the western side of Brockley Hill (the same side as the site) connecting the site to Stanmore. The 107 and 142 bus routes can be accessed in a 4 and 11 minute walk from the site, respectively. The 325 and H12 bus routes, as well as the N98 night bus all commence at Stanmore underground station (Jubilee line), in a 19-minute walk from the site. Several bus routes including two other night bus routes can be accessed at Edgware underground station (Northern line) which is an 8-minute cycle or 10- to 20-minute journey from the site via bus.

Cumulative Trip Generation with Wembley Stadium

- 6.195 Following a request from planning officers at LBH an analysis of trip generation and traffic associated with events at Wembley Stadium and the proposed site was carried out by comparing the timings and calendar of events at both venues throughout 2019. It was deemed that given the typical start and finish times of events at the site and at Wembley, plus the circa 45-minutes to 1:15-hours to travel between Stanmore and Wembley and progress through the crowds and queues, there would be little interaction between traffic associated with the two venues. Moreover, it is reasoned that this amalgamation of traffic would also occur at present with the current venue in Wealdstone, as well as with traffic associated with the former golf centre site which is understood to have involved a higher peak and higher total number of vehicle trips than the proposed site.

Travel Plan

- 6.196 A Travel Plan for the site has been prepared by EAS to provide a strategy to manage, monitor and achieve improvements in the travel characteristics associated with the proposed development on the site.
- 6.197 The Travel Plan proposes a baseline surveys and further survey work over a period of 5 years. Following these surveys targets will be set and monitored. A Travel Plan Co-ordinator will be appointed to develop and implement the Travel Plan. A number of measures are proposed including providing Travel Information Packs to staff, providing details on the company website to guests and a guaranteed Lift Home scheme to staff working later hours when public transport services are more infrequent or in instances of poor weather.
- 6.198 The use of coaches and high vehicle sharing rates have occurred organically at the current venue without any input from management. However, at the proposed site, through the Travel Plan it will be ensured that guests make maximal use of more sustainable travel modes, i.e. maximising coach use and vehicle share rates.
- 6.199 A Car Park Management Plan is also included within the Travel Plan to manage the car park for car and coach parking in advance of and during events.

Delivery and Servicing Plan

- 6.200 The number of deliveries will remain similar to the Premier Banqueting operation or around 3 or 4 per week. Management will ensure that delivery and servicing activities do not coincide with events to maximise highway safety on the site. Delivery vehicles will be able to park close to the entrance and back of house area. Further details of delivery and servicing are contained in the submitted Delivery and Servicing Plan.

Outline Construction Logistics Plan

- 6.201 An Outline Construction Logistics Plan has been prepared in line with Transport for London's Construction Logistics Plan Guidance. The overall objectives of the plan are to: enhance the safety of and protect vulnerable road users; increase the efficiency of construction traffic movements and reduce congestion particularly during the peak periods and mitigate potential negative environmental impacts through improving construction logistics. The Plan provides details of proposed vehicle routing and access arrangements to the site and will be update once a contractor is appointed.

Transport Summary and Conclusions

- 6.202 The design team have sought to address all concerns relating to transport and highways, through redesigning the access and parking area, identifying potential improvements through the ATZ assessment, and carrying out extensive accident and trip generation analysis. With these elements of the proposals all being deemed policy-compliant and suitable, and given the fact that the proposals will remove vehicle trips from Wealdstone town centre, yet it is expected that there will be a net reduction in vehicle trips at the site, the proposals should be supported on transport and highways grounds.
- 6.203 The TA concludes that having carried out significant assessment and analysis, including redesign of the existing access and parking area, the proposals are expected to effectively transfer a number of vehicle trips from Wealdstone centre to the locale of the site, yet this quantum of trip generation is in fact expected to be significantly lower than the volume of vehicle trips that are expected to have occurred under the existing use of the site.
- 6.204 The proposals include a policy-compliant level of car and cycle parking, provision for deliveries and servicing, and are reasoned to engender a benefit to the overall transport system across LB Harrow and beyond. Thus, in the main, the redevelopment will be beneficial and therefore the proposals should be supported on transport and highways grounds.
- 6.205 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*Policy*

- 6.206 LBH policy DM9 advises that proposals requiring a Flood Risk Assessment must demonstrate that the development will be resistant and resilient to all relevant sources of flooding including surface water. The design and layout of proposals requiring a Flood Risk Assessment must contribute to flood risk management and reduction; minimise the risk of flooding on site and not increase the risk of flooding elsewhere; and wherever possible, reduce flood risk overall.

- 6.207 LBH policy DM10 requires proposals for new development to make provision for the installation and management of measures for the efficient use of mains water and for the control and reduction of surface water run off that should achieve greenfield run off rates. The design and layout of major development proposals will be required to: use appropriate sustainable drainage measures to control the rate and volume of surface water run-off; ensure separation of surface and foul water systems; make reasonable provision for the safe storage and passage of flood water in excessive events; and demonstrate adequate arrangements for the management and maintenance of the measures used.
- 6.208 LP policy 5.12 requires development proposals to comply with the flood risk assessment and management requirements in the NPPF.
- 6.209 LP policy 5.13 requires development to utilise sustainable urban drainage systems (SUDS) and aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the drainage hierarchy as follows: 1 store rainwater for later use; 2 use infiltration techniques, such as porous surfaces in non-clay areas; 3 attenuate rainwater in ponds or open water features for gradual release; 4 attenuate rainwater by storing in tanks or sealed water features for gradual release; 5 discharge rainwater direct to a watercourse; 6 discharge rainwater to a surface water sewer/drain; and 7 discharge rainwater to the combined sewer. Drainage should be designed and implemented in ways that deliver other policy objectives of this Plan, including water use efficiency and quality, biodiversity, amenity and recreation.
- 6.210 LPITP policy SI 12 requires development proposals to ensure that flood risk is minimised and mitigated, and that residual risk is addressed and that natural flood management methods should be employed in development proposals due to their multiple benefits including increasing flood storage and creating recreational areas and habitat.
- 6.211 Similar to the adopted policy, LPITP policy SI 13 requires development proposals to aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in accordance with the drainage hierarchy.
- 6.212 The NPPF paragraph 163 requires local planning authorities to ensure that flood risk is not increased elsewhere. Sites greater than 1 hectare should be supported by a site-specific flood risk assessment. Major developments should incorporate sustainable drainage systems that should have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and where possible, provide multifunctional benefits (paragraph 165).

Assessment

- 6.213 A Flood Risk Assessment and Drainage Report has been prepared by EAS.
- 6.214 The EA Flood Map for Planning shows the site is entirely within Flood Zone 1 at low risk of flooding from rivers. The surface water mapping on the GOV.UK website and LB Harrow's flood risk maps show a surface water risk area in front of the existing building, and existing overland flows to be directed to the south east across the site. There is also a residual risk of flooding from a breach in the large pond at the top of the site.

- 6.215 Mitigation measures are proposed to protect the proposed development from surface water flows from the wider site especially land to the north. The mitigation measures will include the location of a French drain around the site to collect overland flows and direct them into the perimeter ditches before the water reaches the site. A small bund will be located behind the French drain to prevent water which doesn't enter the French drain from reaching the lower flat area in front of the new building. The perimeter ditch will continue to discharge to the Ordinary Watercourse in Brockley Hill as in the existing situation, therefore the mitigation measures will be replicating the existing situation.
- 6.216 The whole site falls to the south east towards the Ordinary Watercourse in Brockley Hill and it is highly likely that the existing buildings drain to this watercourse via the ditches in the site boundary. The proposed drainage strategy will replicate this system.
- 6.217 An attenuation strategy has been proposed to manage rainwater runoff from the new development. Areas of hardstanding and the new staff car park will attenuate runoff in lined permeable paving with orifice plate controls. The pipe network will direct roof runoff and runoff from all other impermeable areas to a large pond located to the south of the building. The pond will provide amenity, biodiversity and water quality benefits. The outfall from the pond will be controlled using a Hydrobrake, and will discharge at the 1 in 1 year greenfield runoff rate of 0.80 l/s to the perimeter ditch. This will provide a significant improvement when compared to the existing site.
- 6.218 Proposed measures to maintain the proposed SUDS and drainage ditches are set out in the report.
- 6.219 The report concludes that 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.
- 6.220 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

Policy

- 6.221 The LBH policies pre-date those in the adopted LP, however, policy DM12 requires the design and layout of development proposals to: utilise natural systems such as passive solar design and, wherever possible, incorporate high performing energy retention materials, make provision for natural ventilation and shading to prevent internal overheating; and incorporate techniques that enhance biodiversity.
- 6.222 LBH policy DM13 requires development proposals to connect to existing decentralised energy networks where feasible and DM14 requires development proposals to incorporate renewable energy technology where feasible.

- 6.223 LP policy 5.2 requires development proposals to make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy: 1 Be lean: use less energy; 2 Be clean: supply energy efficiently and 3 Be green: use renewable energy. Major developments should meet minimum improvements over the Target Emission Rate in Building Regulations with zero carbon non-domestic buildings from 2019. Major development proposals are required to include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction targets are to be met within the framework of the energy hierarchy. The carbon dioxide reduction targets should be met on-site. Where targets cannot be fully achieved on-site any shortfall can be provide through a cash in lieu contribution to the relevant borough to be ring fenced to secure delivery of carbon dioxide savings elsewhere.
- 6.224 LP policy 5.3 requires development proposals to demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process. Major development proposals should meet the minimum standards outlined in the Mayor's supplementary planning guidance. The standards include: minimising carbon dioxide emissions across the site; avoiding internal overheating; efficient use of natural resources; minimising the generation of waste and maximising reuse or recycling; ensuring developments are comfortable and secure for users, including avoiding the creation of adverse local climatic conditions; and securing sustainable procurement of materials.
- 6.225 LP policy 5.6 requires development proposals to evaluate the feasibility of CHP systems. LP policy 5.7 requires major development proposals to provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation.
- 6.226 LP policy 5.9 requires major development proposals to reduce potential overheating and reliance on air conditioning systems and demonstrate this in accordance with the cooling hierarchy. Major development proposals should demonstrate how the design, materials, construction and operation of the development would minimise overheating and also meet its cooling needs.
- 6.227 LPITP policy SI2 requires major development to be net zero carbon in accordance with the energy hierarchy. Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided through a cash in lieu contribution to the borough's carbon offset fund.
- 6.228 Part E of the policy requires major development proposals to calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions. Part F of the policy requires development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment.
- 6.229 As with the adopted LP policy, development proposals should demonstrate how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy.

6.230 Paragraph 50 of the NPPF requires new development to help to reduce greenhouse gas emissions, such as through its location, orientation and design.

Assessment

6.231 An Energy Assessment has been prepared by Eight Associates in accordance with the policy in the adopted LP and LPITP and GLA guidance to demonstrate how the targets for carbon dioxide emissions reduction targets are to be met within the framework of the energy hierarchy.

6.232 This concludes that the scheme complies with the 2013 Building Regulations Part L and the minimum energy efficiency targets in the following document has been followed:

- New build (Part L2A) – The actual building CO₂ emissions rate (BER) is no greater than the notional building CO₂ target emissions rate.

6.233 The CO₂ emissions of the scheme have been calculated using the SAP 10.0 carbon emission factors, and the scheme can achieve:

- Non-domestic part of the development achieves 21.3% CO₂ improvement through energy efficiency measures, 'Be Lean' stage;
- A further improvement of 34.9% CO₂ has been achieved through renewable technologies 'Be Green' stage (Air Source Heat Pumps and PV panels);
- Overall, the scheme achieves an improvement of 56.3% beyond Building Regulations through measures on site: energy efficiency measures and maximised of renewable technologies (Air Source Heat Pumps and PV panels); and
- The Zero-carbon target can be achieved through a cash in lieu contribution to the borough's carbon offset fund. The carbon offset payment cost has been calculated as £44,633.

6.234 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.

6.235 Eight Associates have also prepared an Overheating Analysis in accordance with the cooling hierarchy. The proposal maximises passive design measures to the local context in a number of ways including:

- Energy efficient lighting and appliances have been recommended to reduce internal heat gains;
- The building fabric will be insulated over and above the standards set out by Building Regulations and reduced solar gains from a glazing solar factor of 0.3 will help to keep heat out of the building;
- High ceiling to allow thermal stratification;
- High albedo materials to reduce the amount of solar energy absorbed by the roof membrane;
- Fixed overhangs and vertical louvres as per architectural drawings;
- Internal shading devices to further limit solar gains;

- Mechanical ventilation with heat recovery and summer bypass to provide fresh air and purging of heat;
- Natural ventilation to supply fresh air to the building through openable windows (as per ventilation rates section of the report); and
- Active cooling with an efficiency of 3.6 and a set point of 23°C.

- 6.236 The Analysis concludes that the scheme has implemented passive design measures to minimise heat penetration and solar heat gains. However, due to the high occupancy gains, the scheme will require an active cooling system in order to meet the thermal comfort requirements. It should be noted however, that the high occupancy gains will only be during certain events in the banqueting hall.
- 6.237 The proposals have therefore been assessed in accordance with the requirements of LP policy 5.9 and LPITP policy SI2 including the cooling hierarchy. The building has been designed from the outset with measures to reduce potential overheating through the overall design and materials.
- 6.238 A BREEAM Pre-Assessment has been undertaken by Eight Associates. The Assessment confirms that the proposed development has a target of BREEAM 'Excellent'.
- 6.239 A Life Cycle Assessment (LCA) has also been undertaken by Eight Associates to demonstrate compliance with the BREEAM UK New Construction 2018 Mat 01 ('Life Cycle Impacts') criteria and confirm the number of credits that may be awarded.
- 6.240 The LCA concludes that the main global warming potential (GWP) impact over a period of 60 years will come from the construction and operational life stages of the building. The options detailed in the options appraisal provide an insight into potential methods that could reduce the embodied carbon of the development within its construction. The LCA recommends that these scenarios are given consideration by the design team in order to optimise the carbon footprint of the building.
- 6.241 The proposals are therefore in accordance with LPITP policy SI2.

11. Amenity

- 6.242 LBH policy DM1 (C) requires all development to achieve a high standard of privacy and amenity. Proposals that would be detrimental to the privacy and amenity of neighbouring occupiers will be resisted.
- 6.243 Part D of the policy advises that the assessment of privacy and amenity considerations will have regard to the prevailing character of privacy and amenity in the area and the need to make effective use of land and the impact of proposed use and activity upon noise, including hours of operation, vibration, dust, air quality and light pollution.
- 6.244 LBH policy DM12 (A) advises that where relevant, the design and layout of buildings should incorporate measures to mitigate any significant noise or air pollution arising from the future use of the development.
- 6.245 LP policy 7.15 advises that development proposals should seek to manage noise by: avoiding significant adverse noise impacts on health and quality of life as a result of new development; mitigating and minimising the potential adverse impacts of noise as a result of new development without placing unreasonable restrictions on development.

- 6.246 LPITP policy D3 requires development proposals to help prevent or mitigate the impacts of noise. Policy D13 advises that new noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses. Policy D14 requires development proposals to manage noise by avoiding significant adverse noise impacts on health and quality of life.
- 6.247 Paragraph 170 of the NPPF requires planning decisions to contribute and enhance the natural and local environment by preventing new development from contributing to unacceptable levels of noise pollution. Paragraph 180 of the NPPF requires planning decisions to ensure that new development is appropriate for its location taking into account the likely effects of pollution on health, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. Planning decisions should mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development and limit the impact of light pollution from artificial light on local amenity.

Assessment: Noise

- 6.248 A Noise Impact Assessment (NIA) has been undertaken by Noise Solutions Ltd (NSL) to provide an assessment of operational noise resulting from the proposed banqueting facility. An environmental noise survey has been undertaken to establish the prevailing background sound pressure levels at the nearest existing residential receptors which are houses to the east, south and north west of the proposed building. Operational noise levels have been predicted at the nearest noise-sensitive receptors and assessed against recognised standards and guidance.
- 6.249 The closest houses to the east are on Grantham Close, approximately 235m from the building. The closest properties to the south are on Cleopatra Close approximately 275m from the building. These properties will be screened from the proposed banqueting hall by the building orientation. The nearest noise sensitive properties are to the north east on Nutt Grove, approximately 450m from the building.
- 6.250 The NIA assesses the impact of music noise levels in the banqueting hall, noise from people talking outside to the north of the banqueting hall and noise from the use of the car park and arrival and departure of cars and taxis.
- 6.251 The NIA concludes that predicted breakout music noise levels from the banqueting suite, when all external windows and doors are closed, are significantly below the lowest background sound levels measured in the period to midnight, and are therefore below the No Observed Adverse Effect Level. In accordance with the matrix in PPG (Noise), no specific measures are required to mitigate noise from that source. It is recommended that the internal noise levels set out in **Error! Reference source not found.** of the NIA are used as limits to internal sound levels within the banqueting hall and attached spaces.
- 6.252 Noise from people talking at the rear of the banqueting hall is not likely to be audible at any of the identified receptors.
- 6.253 Noise from the use of the car park, and from the arrival and departure of taxis, is not likely to lead to an adverse noise impact.
- 6.254 Plant associated with the proposed kitchens and other spaces has not yet been selected. This will comply with local authority requirements which can be secured through a compliance planning condition.

6.255 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.

Assessment: Lighting

6.256 As set out above, the proposed development is at some distance from the nearest residential receptors and with the exception of the entrance road is screened on all boundaries by existing trees and vegetation. The golf centre building had a bank of floodlights along the top of the building and additional flood lighting around the perimeter of the driving range. These will all be removed.

6.257 Lighting associated with the project will be carefully considered and designed to ensure that there is no excessive glare or light spill that would have an impact on wildlife. Further details and examples of the proposed lighting are provided in the Design and Access Statement.

6.258 The proposals are therefore in accordance with LBH policy DM1.

12. Waste Management

Policy

6.259 LBH policy DM45 requires all proposals to make on-site provision for general waste, the separation of recyclable materials and the collection of organic material for composting. The on-site provision must: provide satisfactory storage volume to meet the general, recycling and organic waste material arising from the site; ensure satisfactory access for collectors and, where relevant, collection vehicles; and be located and screened to avoid nuisance to occupiers and adverse visual impact.

Assessment

6.260 The proposals have been designed with an internal refuse store in the back of house building with further storage in the staff car parking area. Satisfactory storage will be provided and separation of general waste and recycling. Full details are provided in the DAS. As demonstrated in the TA there is sufficient turning space for refuse vehicles in the car park. Refuse collections will be timed so that they don't coincide with events. The proposal is therefore in accordance with LBH policy DM45.

13. Community Infrastructure Levy

6.261 On 6th April 2010, the Community Infrastructure Levy (CIL) Regulations came into force which made it unlawful for a planning obligation to be taken into account as a reason for granting planning permission for a development, or any part of a development, whether there is a local CIL in operation or not, if the obligation does not meet all the following tests set out in Regulation 122(2):

i. necessary to make the development acceptable in planning terms;

ii. directly related to the development;

iii. fairly and reasonably related in scale and kind to the development.

6.262 With regard to the Mayoral and Harrow CIL payment, the application would attract the following payments to contribute towards local infrastructure as set out in the relevant Mayoral CIL Schedule and Harrow's Local CIL Schedule.

- Existing development floorspace (GIA) = 1,240sqm
- Proposed development overall floorspace (GIA) = 1,313 sqm
- Additional floorspace (1,313 – 1,240) = 73sqm

73 x £60 = £4,380 Mayoral CIL Contribution (plus indexation)

73 x £0 = £0 No Harrow CIL Contribution for Use Class D2

Total CIL Contribution = £4,380 (plus indexation)

6.263 The CIL form submitted with this application confirms the Mayoral and Harrow CIL payment applicable for this application scheme payable on implementation of the development.

7.0 Conclusion

7.1 The proposed development is for:

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

7.2 The proposals will provide a replacement facility for Premier Banqueting, a long established business in Harrow that has been operating from a building in Harrow town centre since 2012. The business is reliant on leasing circa 280 car parking spaces from the Council at its Peel House car park opposite the existing banqueting facility. The car park is to be demolished in 2021 to facilitate the Council’s civic centre redevelopment and therefore the banqueting business is being compelled to close at its current location and relocate.

7.3 Premier Banqueting host a wide range of events including weddings, celebratory festivals and charity functions for the multi-cultural communities of Harrow. These types of events require a venue with a specific capacity and higher than normal floor to ceiling height to enable the venue to be dressed along with a sufficient number of car parking spaces due to the fact that guests do not travel on public transport in all of their finery. The existing venue provides an important part of Harrow’s social infrastructure that meets the needs of particular groups and communities in the Borough.

7.4 The applicant has over several years undertaken a comprehensive site search both in Harrow and beyond. It is important that the business remains in Harrow due to the established client base, local employees and local suppliers. The Sequential Site Assessment demonstrates that there are no available and suitable alternative sites in the centre or edge of centre locations in the Boroughs town or other district centres. In accordance with policy in the NPPF an Impact Assessment is not required for a proposal of this size.

7.5 A significant amount of pre-application discussion has been undertaken with officers at LBH, LBB and the GLA. The scheme has been presented to the Council’s DRP and local ward councillors. All comments and feedback have been considered by the design team and has resulted in the application scheme which provides a high quality design response to the applicants brief, Green Belt location and other technical considerations.

7.6 As demonstrated in this Statement, the proposed development is not considered to be inappropriate development in the Green Belt as it meets the criteria (d) and (g) of paragraph 145 of the NPPF and LBH policy DM16. The proposal does not conflict with any of the purposes of including the land within the Green Belt.

7.7 The 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.

7.8 The scheme results in significant environmental, social and economic benefits as set out below.

Environmental benefits

- Efficient re-use of previously developed land in the Green Belt;
- Enhancement to the openness of the Green Belt through a more compact building than the former golf clubhouse;
- Removal of the existing fence, netting and external lighting associated with the driving range substantially improving the visual appearance of the site;
- Replacement building with a higher standard of design and accessibility than the former golf centre building that integrates with the landscape;
- Highly sustainable new building targeting BREEAM 'Excellent' and a 56% reduction in carbon emissions from Building Regulations;
- Implementation of a landscape enhancement strategy including new tree planting providing betterment in landscape terms as well as 20.98% biodiversity net gain and benefits for species identified in the Harrow BAP;
- The introduction of a sustainable drainage system that will improve greenfield run-off rates and include a pond that will also provide biodiversity benefits;
- New footpath for pedestrians to Brockley Hill to create a safer and quicker walking route;
- A reduction in trip generation from the use of the site as a golf centre and the reduction of trips into the Harrow town centre; and
- Introduction of a Travel Plan for the site to promote and encourage sustainable travel.

Social benefits

- Replacement banqueting facility: retaining one of the only facilities of this type with this capacity in Harrow to support the multi-cultural community of the Borough; and
- A building with higher standards of accessibility than the existing facility allowing easy access for older members of the community and those that are less able.

Economic benefits

- The proposals represent a significant long-term investment by Premier Banqueting in the Borough through the construction of a high quality new building;
- The business employs a number of residents of Harrow. A replacement facility will ensure retention of this local employment in the Borough;
- The contribution to the local economy is multiplied due to the use of a variety of local suppliers many of which are based within Harrow. Some events attract guests from other parts of the UK who then stay locally and spend in the local economy; and

- The retention of one of only four banqueting facilities in Harrow with this capacity, allowing Harrow to continue to compete with other Boroughs and maintain competitiveness in the banqueting market and retaining economic benefits within the Borough.

7.9 Based upon the detailed planning assessment presented in support of this scheme, 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.



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