

Supplementary Planning Statement
Brockley Hill, Stanmore – New
Banqueting Facility

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



hghconsulting.com



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1.0 Introduction

- 1.1 This Supplementary Planning Statement has been prepared on behalf of Sairam (Holdings) Ltd to supplement the Planning Statement (August 2020) and Supplementary Planning Statement (January 2021) that have been submitted to the London Borough of Harrow (LBH) in support of a planning application (ref: P/3088/20) at the former Stanmore and Edgware Golf Club, Brockley Hill, Stanmore, HA7 4LR, for the following development:

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

- 1.2 The purpose of this statement is to provide additional information in support of the planning application as requested by Members at the Harrow Planning Committee meeting on 30th June 2021. At the meeting Members resolved to defer making a decision on the planning application and requested that the applicant submit the additional information (including a revised Landscape and Visual Assessment, a Car Park Management Plan, Archaeological Evaluation, Ecological Assessment and Assessment of Alternative Indoor and Outdoor Sports Provision) by August 2021 in order for the application to be considered at the early September 2021 Planning Committee meeting.
- 1.3 Subsequent to this meeting Members agreed an extension of time to allow the applications sufficient time to provide the requested information and allow a further 21 day consultation period before the planning application is considered at the November planning committee meeting.

Background

- 1.4 The planning application was submitted on 27th August 2020 and found to be valid on 1st September 2020. The application was subject to the statutory 21 day consultation period with comments received from LBH (Design, Landscape, Highways, Planning Policy, Drainage); the GLA; the London Borough of Barnet (including Barnet Highways); and the Metropolitan Police Secure by Design Officer.
- 1.5 In January 2021, the applicants submitted minor amendments to the scheme to address comments made by statutory consultees and to amend the planning application boundary and site area. Following this re-submission, LBH re-consulted on the planning application for a further 21 days.
- 1.6 The planning application was discussed by Members at the Council’s Planning Committee meeting on 30th June 2021 with a recommendation from officers to refuse the planning application for the following reasons:
1. *The applicant has failed to demonstrate that the proposed development would not have a greater impact on the openness of the Green Belt than the existing development on the application site. The proposed development would therefore constitute inappropriate development in the Green Belt, to the detriment of the character, appearance and openness of the Green Belt, contrary to the National Planning Policy Framework (2019), policy G2 of The London Plan (2021), Core policy CS 1 F of the Harrow Core Strategy (2012), and policy DM 16 of the Harrow Development Management Policies Local Plan (2013), and no very special circumstances have been demonstrated by the applicant whereby the harm by reason of inappropriateness is outweighed by other considerations.*

2. *The proposed development, by reason of failure to provide adequate on-site or off site car / coach parking and lack of integrated drop off facilities to serve the proposed banqueting facility, would significantly intensify site usage and generated trips. The associated likely on site congestion and parking overspill into the London Borough of Harrow and the London Borough of Barnet, with particular reference to the residential streets to the south-east of the site, is therefore considered to be detrimental to highway and pedestrian safety, and the amenities of neighbouring occupiers, contrary to the National Planning Policy Framework (2019), Policy T4 of The London Plan (2021), and policies DM 42 E and F, DM 1 B (f) (C) and D (h), policy DM 42 E and F and DM 43 B and C of the Harrow Development Management polices Local Plan (2013).*
 3. *The proposed development by reason of inadequate archaeological evaluation of the application site, has failed to demonstrate that potential archaeological assets of significant importance would not be harmed and impacts minimised through appropriate design and construction. The proposal would therefore fail to comply the National Planning Policy Framework (2019), policy HC1 C and D of The London Plan (2021), policy CS1 D of the Harrow Core Strategy (2012) and policy DM 7 A, B and H of the Harrow Development Management Polices Local Plan (2013).*
 4. *The proposed development, in the absence of adequate Ecological Assessment which fails to address the sites strategic Green Belt location and the sites boundaries including its close proximity to the adjoining Pear Wood and Stanmore Country Park Site of Importance for Nature Conservation, fails to demonstrate that biodiversity value of the surrounding area would not be harmed, protected or enhanced, contrary to the National Planning Policy Framework (2019), policy G6 of The London Plan (2021), policy CS 1 E of the Harrow Core Strategy (2012) and policies DM 20 and DM 21 of the Harrow Development Management Polices Local Plan (2013).*
- 1.7 Officers recommended an additional reason for refusal that was included on the Planning Committee Addendum dated 30th June 2021:
5. *The proposed development in the absence of the assessment which clearly shows that the existing sports and recreational land or facilities to be surplus to requirements for provision of alternative sports and recreational provision at the local and sub regional level taking into account the borough's assessment of need, fails to comply with the National Planning Policy Framework (2019) and policy S5 of the London Plan (2021).*
- 1.8 Members resolved to defer the planning application to allow the applicant to submit the additional information in respect of the proposed reasons for refusal.

Structure of Statement

- 1.9 The statement is structured as follows:

Section 2 addresses the first reason for refusal in respect of the impact of the proposed development on the openness of the Green Belt and demonstrates that very special circumstances exist to outweigh the minimal harm to the Green Belt and other limited harm from the minor loss of sports land.

Section 3 addresses the proposed second reason for refusal and summaries the content of the proposed Car Parking Management Plan that demonstrates that even for an at-capacity event there would be no overspill car parking off-site, thereby overcoming the proposed reason for refusal.

Section 4 summarises the findings from the archaeological evaluation and concludes that the third proposed reason for refusal has been overcome.

Section 5 provides the results of an updated Reptile Survey (July – September 2021) and a rebuttal to the comments in the officer’s report in respect of biodiversity which demonstrates that the proposed fourth reason for refusal is no longer reasonable.

Section 6 addresses the proposed fifth reason for refusal regarding the loss of sport and recreational land and facilities.

Section 7 provides a summary and conclusion that demonstrates that there are no planning grounds for withholding planning permission for the proposed development.

2.0 Green Belt

- 2.1 The Council's suggested first reason for refusal is that the applicant has failed to demonstrate that the proposed development would not have a greater impact on the openness of the Green Belt than the existing development on the application site. The proposed development is therefore considered to constitute inappropriate development in the Green Belt and no very special circumstances have been demonstrated by the applicant whereby the harm by reason of inappropriateness is outweighed by other considerations.

Background

- 2.2 Prior to the fire at the former clubhouse on the application site in June 2020 there had been a significant amount of pre-application discussion with senior officers at Harrow Council and technical assessment work carried out. Following the fire, discussions with the Head of Development Management confirmed that officers would continue to assess the scheme by comparison with the clubhouse building as it existed prior to the fire. It should also be noted that the planning application was validated on this basis. (It was not until June 2021 that the Council took an alternative stance and indicated that it would assess the impact of the scheme on the Green Belt by comparison with the fire-damaged condition of the building on site).
- 2.3 Accordingly, the initial assessment of the proposed development against the criteria in para. 149 (d) and (g) of the NPPF (2021) (formerly para. 145 of the NPPF) was undertaken on the basis of the pre-fire condition of the application site and clubhouse building.
- 2.4 This assessment in the Planning Statement concluded the following:
- "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"* (para 6.53 of the Planning Statement); and
- "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"* (para. 6.74 of the Planning Statement).
- 2.5 Following the dismissal of a planning appeal for a 5-bedroom, 2-storey dwelling in the Green Belt at Lanbrook, St Mary's Lane, Hertingfordbury in East Hertfordshire (APP/J1915/W/20/3254917) officers decided that the assessment of the proposed development on the impact of openness of the Green Belt should be based on the existing situation (i.e., the application site post-fire) rather than the application site and clubhouse building pre-fire.
- 2.6 The circumstances of the Lanbrook case were materially different to those of the present case. In that case the post-fire dwelling had been entirely demolished by the time the appeal was determined. In effect, the Inspector was comparing the proposal with an almost clear site. There were also heritage impacts weighing against the proposal. In the present case, the site is far from clear, despite the fire, and there are no heritage impacts at all.

- 2.7 The relevant Green Belt policies in the NPPF, London Plan and Harrow Local Plan are set out in paras 6.33 to 6.42 of the Planning Statement. Since the Planning Statement was drafted, a new version of the NPPF has been published with new paragraph numbering for Green Belt policies, and London Plan Policy G2 (that repeats the Green Belt policy in the NPPF) has now been adopted. However, there is no substantive change to Green Belt policy at any level since the application was submitted in August 2020.
- 2.8 Updated assessments have been undertaken of the site in its existing situation post fire including a revised Landscape Visual Assessment (LVA) and a Supplementary Openness and Landscape Appraisal by Cornus Landscape, Planning and Design. In light of the updated assessments, the proposed development would not now fall under any of the exceptions in para. 149 of the NPPF. The proposal must therefore be considered, in policy terms, inappropriate development in the Green Belt which should not be approved except in very special circumstances.
- 2.9 NPPF para. 148 states:

“When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”

Assessment against paragraph 148 of the NPPF

Harm to the Green Belt

- 2.10 There is no dispute between the applicant and the Council that the application site comprises previously development land. In accordance with the definition in the NPPF, the land was previously occupied by a permanent structure in the form of the golf clubhouse / driving range, some of which still exists, and associated fixed surface infrastructure which also still exists. The officer’s report to committee in para. 6.2.7 states:
- “In relation to exception test (g) it is accepted that the proposed replacement building would be sited on previously developed land and the fire has not altered this fact as the areas of hardstanding where the building was situated has not changed”.*
- 2.11 The Supplementary Openness and Landscape Appraisal (September 2021) provides an assessment of the proposals against the five purposes of including land within the Green Belt land set out in NPPF paragraph 134. This concludes that the site makes no contribution to purposes 1, 2 and 4 and a limited contribution to purposes 3 and 5. The Council (para 6.2.37 of the officer’s report) states that the proposal would not conflict with any of the purposes of including land within the Green Belt:

“The surrounding boundaries of the wider site are occupied by mature trees and vegetation and there is no physical connection between the area of land proposed for development and any large built up areas. It is also accepted that the building would be positioned on previously developed land and so would not result in any encroachment of the countryside. The proposed site is also not in proximity to any historic towns. However, it is considered there is potential for conflict with para 134 (e) “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”. The proposal is a town centre use and therefore it must be demonstrated that there are no other suitable urban sites. The applicant has provided a comprehensive sequential assessment and has sufficiently demonstrated that there are no alternative appropriate urban sites which is discussed in more detail below. It is therefore considered that the proposal would not conflict with paragraph 134 (e).”

- 2.12 An assessment must also be made of the impact of the proposed development on the openness of the Green Belt.
- 2.13 As the Court of Appeal held in **Turner v Secretary of State for Communities and Local Government** [2016] EWCA Civ 446, the concept of openness is “not narrowly limited to [a] volumetric approach” but one which is “open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case” (para. 14).
- 2.14 This “open-textured” approach to openness is now reflected in the UK Government’s Planning Practice Guidance for England, which states at paragraph 001 of the ‘Green Belt’ chapter:

“What factors can be taken into account when considering the potential impact of development on the openness of the Green Belt?”

Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so requires a judgement based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- *Openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *The duration of the development, and its remendability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *The degree of activity likely to be generated, such as traffic generation.”*

- 2.15 In making this assessment LBH Policy DM16 requires regard to be had to: the height of the existing buildings on the site; the proportion of the site that is already developed; and the footprint and the distribution and character of existing buildings.

Spatial impact of the proposed development on the openness of the Green Belt

- 2.16 In terms of height, the majority of the steel structure of the former clubhouse building, including its maximum ridge height, still exists. The maximum height of the roof of the proposed building will be lower than the existing maximum ridge height and this will result in a positive impact on openness.
- 2.17 The site is previously developed land currently occupied by the structure and lower walls of the clubhouse building, fencing, hardstanding (associated with the car park, vehicular access from Brockley Hill, internal footpaths, the driving range and putting green) and the bunkers. All of the proposed development will be sited within the area of previously developed land. Tables 2 and 3 of the Planning Statement provide details of the total areas of existing hardstanding, hardstanding to be removed and proposed hardstanding and confirm that the proposed development will result in an overall 4% reduction in hardstanding over the existing development. This will result in a positive impact on openness.
- 2.18 The Oxford English Dictionary definition of “*footprint*” is “*the impression left by a foot or shoe on the ground or a surface*”. This is usually delineated by the boundaries of an exterior wall or structure. In the existing situation the footprint of the original clubhouse building is still clearly visible within the boundaries of the structure, including its east and west wings, and so remains unchanged from the footprint of the original clubhouse building which is 850sqm. The footprint of the proposed banqueting facility is 1,108sqm (an increase of 30%) but the distribution of proposed built development is more compact. As a result, the footprint of the proposed building would result in a neutral impact on openness.
- 2.19 In the existing situation, where the structure has no complete solid walls or roof, there is no useable floorspace and no definable volume. The proposed development will have a floorspace of 1,308sqm and a volume of 4,859cubm. In terms of floorspace and volume, assessed in isolation, the proposed building will have a negative impact on openness.
- 2.20 Table 1 summarises the assessment of the impact of the proposed development on openness in spatial terms:

Metric	Spatial impact on openness
Height	Positive
Hardstanding	Positive
Footprint	Neutral
Floorspace	Negative
Volume	Negative

Visual impact of the proposed development on the openness of the Green Belt

- 2.21 The visual impact of the proposed development on the amenity of the Green Belt also needs to be taken into consideration in the assessment of harm.
- 2.22 A Supplementary Openness and Landscape Appraisal has been prepared by Cornus Landscape, Planning and Design to assess the visual impact of the proposed development on the openness of the Green Belt. This re-assesses the proposal based on the existing baseline of the fire-damaged clubhouse building. Appended to this document is a new, detailed Landscape and Visual Appraisal which reviews the landscape and visual effects generally of the proposed development.
- 2.23 The Supplementary Openness and Landscape Appraisal concludes that, on balance, the proposed development will cause no greater harm to the visual openness of the Green Belt from:
- Public views from Brockley Hill.
 - Private long-range views from the north and south outside of the application site.
 - Immediate views within the application site.

Other harm

- 2.24 The Council have confirmed that the proposed development results in no harm in respect of: the location of the proposed development with no sequentially preferable available sites; design; impact on the character and amenity of the area; residential amenity; traffic and highway safety; trees and landscaping; energy and sustainability; development and flood risk; accessibility; and fire safety
- 2.25 This Statement and accompanying technical documents now demonstrate that the proposed development would not result in any other harm in respect of: car parking; archaeology; and ecology.
- 2.26 As explained in section 6 of this statement, the proposed development would result in a technical policy breach in that the proposals result in a very limited loss of land for sport and recreation (partial loss of driving range). However, the wider land (outside of the red line) is retained (golf course) and could be enhanced and used for sport and recreation. The very limited loss of land for sport and recreation is not considered to result in significant harm.

Very Special Circumstances

- 2.27 The applicant considers that '*very special circumstances*' exist that outweigh the very limited harm to the Green Belt as a result of the proposed development and these comprise:
1. The replacement of the fire-damaged building with a building that is of a significantly higher quality and appearance that will secure the long-term future of the site.
 2. The need to relocate the Premier Banqueting business in Harrow and the absence of any alternative sites that could accommodate a banqueting facility.
 3. The need for a banqueting facility to support the diverse, multi-ethnic communities of Harrow.
 4. Biodiversity net gain of 20% (habitat units) and 49.55% (hedgerow units).

1. The replacement of the fire-damaged building with a building that is of a significantly higher quality and appearance that will secure the long term future of the site.

- 2.28 There would be substantial planning benefits in replacing the fire-damaged building that is an unsightly structure in the landscape with a brand new, high-quality building. This would considerably improve the character and visual amenity of the area and secure a long-term use for this previously developed site that would deliver social, environmental and economic benefits.
- 2.29 Circumstances beyond the control of the landowner, such as a fire, flood event or earthquake that have caused a current building to have a different size and/or appearance than was very recently the case are clearly exceptional circumstances that should be given considerable weight when undertaking the Green Belt planning balance.
- 2.30 In this case, as detailed in the Planning Statement, the applicant had already entered into pre-application discussions with the Council regarding the application proposals and undertaken technical assessment and survey work when the former clubhouse building was subject to a fire in late June 2020. The scheme was initially presented to officers at meetings in September and October 2019, prior to further pre-application meetings from March 2020 onwards. Technical assessments and survey work was undertaken in late 2019 and early to mid 2020. By June 2020, pre-application discussions had reached an advanced stage, where the principle of the use and the size and scale of the proposed building had been accepted by officers.
- 2.31 The fire caused the building to have a different appearance than the original building and is currently unusable. The structure of the building and lower areas of wall have not been demolished and the form of the building, central walls and graffiti are still highly visible in the landscape and have a detrimental impact on the character and visual amenity of the area.
- 2.32 As concluded in the Supplementary Openness and Landscape Appraisal, the proposed development will not cause greater harm to the visual openness of the Green Belt either. The inconspicuous nature of the new building weighs in favour of the development.
- 2.33 As explained above, the Lanbrook case that has been relied upon by the Council was materially different in that the post-fire dwelling had been entirely demolished to leave a clear site and there were heritage impacts weighing against the proposal. In the present case, the site is very far from clear, the fire-damaged structure having the appearance of being in urgent need of replacement.
- 2.34 In this context, the proposed development would replace the fire-damaged structure with a high-quality building that would transform the visual appearance of the site. This is a very weighty consideration in the Green Belt planning balance.

2. The need to relocate the Premier Banqueting business in Harrow and the absence of any alternative sites that could accommodate a banqueting facility

- 2.35 The key driver of the proposal is that Premier Banqueting (who host a wide range of events including weddings, celebratory occasions and charity events for the multi-ethnic communities of Harrow) were required to relocate from their current venue at 1 Canning Road by March 2021. As explained in the Planning Statement and as the Council is fully aware, the business was only able to operate due to fact that they could lease car parking spaces in the Peel House car park which is located directly opposite 1 Canning Road.

- 2.36 Premier Banqueting has had to re-locate from 1 Canning Road due to the termination of the lease (by the Council) for car parking spaces at the Peel House car park, because it is the site of the Council's approved new Civic Centre redevelopment. A review of events in 2019 confirms that around two thirds of events relied on the use of the car park. The maximum capacity of the venue was 800 guests. Premier Banqueting confirmed that they took over the whole car park on each occasion, even though generally a maximum of 100 car parking spaces were occupied as it was easier to book out the whole car park from a management perspective both for Premier Banqueting and the LBH.
- 2.37 Even though the facility at Canning Road is in the town centre, the vast majority of guests travelled to the site via private means of transport (i.e., organised coaches, taxis and private cars) due to the nature of events, where guests are in their wedding / celebratory attire. The banqueting facility needs to be able to cater for guests across all age groups including those that are less able and unable to walk far. It is therefore essential that the business relocates to a site with sufficient car/coach parking for it to continue to operate.
- 2.38 Premier Banqueting has operated in the LBH since 2008 and over this time has become an integral part of the social and economic infrastructure supporting the diverse, multi-ethnic communities of Harrow. The applicant previously owned Maurya restaurant in Stanmore and relocated to the venue at Canning Road to meet the growing demand for larger events in 2012. The business is well respected with an established clientele from several communities within the Borough.
- 2.39 A replacement venue within the Borough is critical to long-term business continuity and maintaining the client base that the applicant has built up over the years (85% of event hosts lived or worked within either a 5 mile radius or 10 miles from the Premier Banqueting facility). The other key criteria in selecting a new site / venue are the capacity and layout of the venue and car parking spaces.
- 2.40 The applicant commenced the search for an alternative site in 2015. It has undertaken an extensive search over a number of years to find a replacement site in the Borough of Harrow that has sufficient capacity (for 500 guests), a sufficient number of car parking spaces (100) and space for coaches to drop off/pick up guests. The banqueting space must have a layout across a single floor and a floor-to-ceiling height of 5m to provide sufficient space for events and to enable the venue to be dressed for these special occasions. The applicant was looking for a site / premises to buy or secure on a very long lease in order to realise the capital investment and provide long-term business security.
- 2.41 The Council's Regeneration Unit had a role in assisting the applicant to find and secure a new site to relocate the Premier Banqueting business to retain the business within the Borough following the announcement of the closure of the Peel Road car park. This included meetings with senior officers in the Council including the Chief Executive and the former Director of Regeneration and expediting searches. This work also involved looking at sites in Harrow such as Lexis House, Headstone Drive, Debenhams car park and Harrow Leisure Centre.
- 2.42 The applicants site search involved the serious consideration of around 20 sites. Only a small number of potential sites were identified within the Borough itself and none of these were considered to be suitable or available for a number of reasons, including: insufficient seating capacity; insufficient car/coach parking spaces; lack of suitable internal layout or a layout that could be altered; ceiling height that was too low; planning and building constraints imposed by a listed building.

- 2.43 The application site was identified as an available and suitable site for the relocation of Premier Banqueting, which could accommodate all of the business' requirements within the original broad timetable to relocate the business.
- 2.44 In addition to sites that were on the market at the time of Premier Banqueting's search and for the purposes of this planning application to demonstrate that no sequentially preferable sites are were available and suitable for the banqueting facility, an extensive Sequential Site Search has been undertaken. The scope of this has been agreed with officers at Harrow. The Sequential Site Search not only considered potential sites in Harrow but also in town centres in the neighbouring Boroughs of London Borough of Brent (Wembley), London Borough of Hillington (Ruslip/Eastcote, Northolt), Hertsmere Borough Council (Borehamwood) and London Borough of Barnet (Edgware and Colindale) based on a search area of 5 miles. This concluded that there are no alternative suitable and available sites for the proposed development in a town centre or edge of centre location within the site search area.
- 2.45 Officers agreed with this conclusion and the officer's report in para. 6.2.52 states:
- "It has been adequately demonstrated that all alternatives for the proposal in town centres and edge of centre locations have been explored in terms of scale, format, car parking provision and scope for disaggregation in the format of the proposed development".*
- 2.46 Since the Sequential Site Assessment was prepared, the Debenhams store in Harrow town centre has closed and has been marketed to let and is not for sale. A lease has been signed for the ground and first floors to a niche concessions department store and only the second (top) floor is available. The applicant has assessed the availability of the third floor of the former Debenhams store in the same way as the other sites in the Sequential Site Assessment and has concluded that the site is not suitable for the relocation of the business (refer to Appendix 1 for further details).
- 2.47 The fact that after several years of searching, the application site is the only site that has been found to be suitable and available for the relocation of Premier Banqueting and that no sequentially preferable available sites have been identified through an extensive site search is another very weighty consideration in the Green Belt planning balance.

3. The need for a banqueting facility to support the diverse, multi-ethnic communities of Harrow

- 2.48 The Premier Banqueting facility catered for a range of ethnic weddings and other cultural and religious celebrations as well as charity events. Following the closure of the banqueting facility at 1 Canning Road, there is now no other community and cultural facility of a similar nature in the Borough of Harrow to support its diverse, multi-ethnic communities.

Planning policy re community and cultural infrastructure

- 2.49 The NPPF in para. 93 requires the planning system to provide the social and cultural facilities that the community needs and states:

"To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- a) *plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and **other local services** to enhance the sustainability of communities and residential environments;*
- b) *take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community; [...]*
- d) *ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community” (our emphasis).*

2.50 Para. 20 of the NPPF requires strategic policies in Local Plans to make sufficient provision for community facilities such as health, education and cultural infrastructure.

2.51 London Plan Policy GG1 (Building strong and inclusive communities) states that:

“Good growth is inclusive growth. To build on the city’s tradition of openness, diversity and equality, and help deliver strong inclusive communities, those involved in planning and development must:

- A. *encourage early and inclusive engagement with stakeholders, including local communities, in the development of proposals, policies and area-based strategies....*
- C. *provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation.”*

2.52 The planning system requires social and cultural facilities to be supported in the interests of the social and cultural well-being of communities generally. There is nothing in policy that limits social and cultural infrastructure to services or facilities provided by the public or third sectors. Policy does not specify how such infrastructure should be funded or accessed.

2.53 In 2019, the Mayor of London published the “*Cultural Infrastructure Plan: A Call to Action*”. The Mayor’s forward states:

“One vital part in enabling and building on this success is the very buildings and places where it happens – our cultural infrastructure. London’s cultural infrastructure is more than a roll call of famous places. It’s about everyday experiences and opportunities for people to access culture on their own doorstep. And it’s about facilities like local arts centres, libraries, pubs, community centres, legal street art walls, creative workspace, rehearsal spaces and night-time venues all playing an important role in bringing out communities together.”

2.54 The Plan therefore reinforces the importance of providing the cultural facilities that are needed by communities in London. The proposed development would positively promote the objectives of these policies in the NPPF, London Plan and the Mayor’s Cultural Infrastructure Plan.

Harrow: Multi-ethnic Borough

- 2.55 The document ‘Harrow Local Economic Assessment 2019-20 Population’ provides details of the demographics of Harrow’s population. It confirms in para. 4.14 that Harrow has one of the most ethnically diverse populations in the country. The 2011 Census shows that 69.1% of Harrow’s residents identified as members of ethnic minorities, where the term “ethnic minority” is defined as all those who do not identify as White British. Harrow was ranked fourth highest nationally for the proportion of residents from minority ethnic groups.
- 2.56 The paper advises in para. 4.15 that Harrow’s largest minority ethnic group is the Indian group and the 2011 Census results showed that 26% of Harrow’s population was then of Indian origin. This is a much higher percentage than it is for London as a whole and west London more particularly.
- 2.57 In para. 4.16 the paper cites the GLA’s 2016-based Ethnic Group Projections (Trend-based, Central scenario) that models how Harrow’s population composition may change to 2050. It estimates that the population of Indian origin will remain the largest ethnic group and is likely to make up one third of Harrow’s population by 2050.
- 2.58 Para 4.17 of the paper advises that data from the 2011 Census and analysis from the GLA’s Religious Diversity Indices showed how Harrow had the second highest level of religious diversity of any local authority in England and Wales. Hindu was the second most common religion in the Borough (25.3% of the population) – the highest proportion of Hindu residents nationally. The paper states:
- “As the population’s ethnic composition changes, rates of participation in various religions are also likely to change”.*
- 2.59 The above demonstrates the highly multi-ethnic nature of the Borough. As planning policy requires, it is essential that all communities in the Borough are supported and have adequate social and cultural infrastructure. The proposal would contribute substantially towards meeting this requirement.

Lack of alternative banqueting facilities in Harrow

- 2.60 The Premier Banqueting facility catered for ethnic weddings and other celebratory and religious occasions as well as providing a venue for local charity events. The venue at 1 Canning Road was a unique facility in the Borough providing an important function to the multi-ethnic communities of Harrow.
- 2.61 The nature of ethnic weddings requires a large number of guests to be accommodated in a single space, with sufficient additional space for extensive staging and decorations. In particular, ceilings must be of a sufficient height to accommodate a wedding mandap or other staging, and there needs to be uninterrupted column-free space.
- 2.62 The Premier Banqueting facility on Canning Road was a conversion of part of an office building with a large flight of stairs to the main hall. It is important that the new facility is fully accessible to all members of the community including the elderly and less able guests.
- 2.63 Banqueting facilities must have state of the art flexible kitchen facilities to be able to cater for the religious needs and specific requirements of a number of different type of events and guests within the various ethnic communities in Harrow.

- 2.64 There are a very limited number of venues in Harrow that can currently accommodate ethnic / faith weddings or other celebratory or charity events. Now that Premier Banqueting has had to close, there are only three other venues in Harrow (Harrow Leisure Centre, Kadwa Patridar Centre and Dhamecha Lohana Centre) that can currently accommodate gatherings with more than 200 guests to serve the most ethnic diverse borough in London (see Appendix 2 of the Planning Statement).
- 2.65 Byron Hall in Harrow Leisure centre is a large sports hall. Although it can hold banqueting events, it also holds other events such sporting events, exams and has recently been used as a COVID-19 vaccination centre. The facility is therefore not a dedicated banqueting facility and its use for such purposes cannot therefore be assured.
- 2.66 The Kadwa Patridar Centre and Dhamecha Lohana Centre both serve only one specific community in Harrow. Although both have kitchens, they are vegetarian kitchens and are not licensed facilities. They are not dedicated facilities that can provide for the multi-ethnic population of Harrow and are not available to support charity events that are not vegetarian or require to be a licensed facility.
- 2.67 The shortage of this type of facility is highlighted in a letter from the International Siddhashram Shakti Centre based on Palmeston Road in Harrow (Appendix 2). The centre in Harrow is run by an international organisation based in Harrow which provides the entire Hindu community with a place of worship and also supports other faith organisations. It is also involved with numerous charitable causes outside of the Hindu community. As a consequence of the lack of alternative venues in Harrow the banqueting hall will provide a much needed facility that can assist with fundraising activities as well as a place for weddings and other events associated with the Temple.
- 2.68 As demonstrated in the Sequential Site Assessment, there are no alternative sites that would meet the relevant criteria for a banqueting venue.
- 2.69 In addition, there are other higher value land uses in the Borough competing for sites suitable for banqueting uses; for example, the recent planning permission for the change of use of the VIP Room in Edgware to self-storage space (LPA ref: P/5310/19). It is therefore critically important to retain banqueting facilities to serve the local communities as an important part of the social and cultural infrastructure of the Borough, and to provide easy access to this type of facility for local residents, especially the older members of the community or those unable to travel long distances.
- 2.70 Due to the large multi-ethnic communities in the Borough, the closure of Premier Banqueting and the lack of alternative facilities in Harrow, there is a pressing need for a new banqueting facility of this type to serve the diverse local communities.

4. Biodiversity net gain

- 2.71 The site currently has no habitats of any value and a low level of biodiversity. The opportunity has been taken in the course of the design process to incorporate 20% biodiversity net gain (habitat units) into the proposals, as well as a net gain of 49.55% in hedgerow units. There is currently no policy that requires this level of biodiversity net gain, and the forthcoming Environment Bill is likely to introduce a more modest requirement of 10%. It is understood that no other major scheme in Harrow has yet delivered biodiversity net gain, so the proposal would be a benchmark/beacon project for the Borough.

Conclusion: Green Belt Balance

- 2.72 The application site is previously developed land in the Green Belt and the proposals would not conflict with any of the five purposes of including land within the Green Belt.
- 2.73 The proposed development is for a new banqueting facility in the Green Belt. The construction of new building is regarded as inappropriate in the Green Belt, and it is accepted that none of the exceptions in para. 149 of the NPPF applies in this case. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 2.74 When undertaking this Green Belt balance, substantial weight is required to be given to any harm to the Green Belt.
- 2.75 In spatial terms, the proposed building will have a greater quantum of floorspace, and volume compared with the existing development. Substantial weight is therefore to be given to this harm. In visual terms, the proposed development will result in no greater harm to the visual openness of the Green Belt compared with the existing development, therefore the impact in those terms is neutral.
- 2.76 The only other harm resulting from the proposals would be the limited technical breach of policy as a result of the partial loss of the driving range for sport and recreational use. The loss of this land should be given very limited weight as the remainder of land is available for sport and recreational uses and could be enhanced and brought back into use in the future if the owners so wish. This very small loss of sports land is considered to result in very limited 'other harm' to the provision of sport and recreation land, buildings and facilities in the Borough.
- 2.77 On the other side of the balance, the current building is an unsightly structure in the landscape having been severely damaged by fire. The proposal would replace this damaged structure with a high-quality, more compact form of development. This would result in a substantial improvement in landscape, visual and character terms. At the same time, the development would be meeting a specific and identified community and cultural need in circumstances where there are no alternative available or suitable sites in Harrow or in town centres in neighbouring boroughs for a banqueting facility. In addition, the proposal would incorporate a high percentage of biodiversity net gain.
- 2.78 These "other considerations", considered in the round, are so weighty and compelling that they clearly outweigh the harms, including the Green Belt harms. As such the very special circumstances necessary to justify the development proposed have been demonstrated and support planning permission being granted.

3.0 Parking Management Plan

- 3.1 The proposed second reason for refusal is that in the Council's view, there would be insufficient on- or off-site car parking and coach parking and integrated drop-off facility to serve the proposed banqueting facility that would then likely result in on-site congestion and parking overspill into the London Boroughs of Barnet and Harrow. Particular reference is made to parking on residential streets to the south-east of the site which is considered to be detrimental to highway and pedestrian safety and the amenity of neighbouring occupiers.
- 3.2 The applicant's Transport Consultant has prepared a Parking Management Plan to provide confidence to the Council that a workable solution to the potential demand for parking can be implemented in response to the reason for refusal. The Parking Management Plan demonstrates how the site would operate to ensure that no overspill car parking would occur even in a worst-case scenario for an at capacity event of 500 guests where 90% of guests would travel by private car.
- 3.3 The Parking Management Plan proposes a concierge system whereby on arrival cars are directed to car parking spaces and the car park is managed. To cover all eventualities, a valet parking system is also proposed whereby on arrival at the banqueting facility, cars could (if required) be moved off-site to the Elstree Manor Hotel, also owned by the applicant, (3km from the application site) and on departure the guests would be transported to their car using an electric vehicle.
- 3.4 It is unlikely that this situation would occur as the aim of the Travel Plan is to minimise car use and the evidence so far has shown that this level of car use does not typically occur. The scenarios in the Parking Management Plan provide certainty on this matter and demonstrate that there would not be an overspill parking problem to surrounding residential streets.
- 3.5 The Parking Management Plan, which would be secured by a legal agreement, would be sufficient to ensure an effective scheme to be enforceable against the application site (as the application site is "the land" that is the subject of the planning obligation for the purposes of s106 of the TCPA 1990). In any event, the obligation can also be made under the alternative provision of s16 of the Greater London Council Act 1974, which can relate to land outside the Borough.
- 3.6 The proposed reason for refusal also suggests that insufficient car parking on and off site would significantly intensify site usage and generated trips. However, the officer's report to committee and correspondence with the Council's Infrastructure Engineer confirms that the only outstanding issue in respect of transport and highways is in respect of overspill parking and this has now been fully addressed.
- 3.7 The Parking Management Plan and s106 Agreement Parking Scheme obligations overcome the Council's concerns regarding the risk of overspill car parking off-site and demonstrate that the proposed reason for refusal would not now be reasonable.

4.0 Archaeology

- 4.1 The third proposed reason for refusal advises that there has been inadequate archaeological evaluation of the application site and a failure to demonstrate that potential archaeological assets of significant importance would not be harmed, and impacts minimised through appropriate design and construction.
- 4.2 An archaeological evaluation (trenching) was undertaken in August 2021 in accordance with a scope of work agreed with the Greater London Archaeological Advisory Service (GLAAS) that involved the excavation of five trenches on the north-western side of the clubhouse building. The findings are presented in the Archaeological Field Evaluation report prepared by Archaeology Wales.
- 4.3 No trenches revealed in-situ archaeological deposits.
- 4.4 The accompanying letter from Heritage Collective which has been sent to GLAAS advises that no further investigations are required and that the investigations undertaken have overcome the Council's suggested reason for refusal number 3 such that it is no longer valid.

5.0 Ecology

- 5.1 The proposed fourth reason for refusal is that in the Council's view the lack of an adequate Ecological Assessment fails to demonstrate that the biodiversity value of the surrounding area would not be harmed, protected or enhanced. The reason for refusal also makes reference to the location of the site in the Green Belt. Green Belt designation relates purely to the openness of land and does not imply ecological value. References to the Green Belt status of the land are therefore irrelevant in the ecological context.
- 5.2 The Council's Biodiversity Officer raised a number of matters in his consultation response to the planning application which are repeated in the officer's report to committee. Tyler Grange have prepared a technical note that provides a measured and accurate rebuttal to the comments in the officer's report regarding biodiversity.
- 5.3 Tyler Grange have undertaken a further reptile survey within the application site (July – September 2021). No reptiles were recorded basking on or under any artificial or natural refugia on the site during any of the survey visits. The survey concludes that reptiles are absent and would not be affected by the proposals.
- 5.4 The technical note from Tyler Grange concludes that there is no defensible reason for refusal that can be attributed to impacts on biodiversity or ecological networks. The required mitigation and enhancement, including measurable net gains for biodiversity (20% habitat units and 49.55% hedgerow units), can be secured through appropriately worded planning conditions.

6.0 Sports and Recreation Provision

6.1 The proposed fifth reason for refusal relates to the absence of an assessment to demonstrate that the existing sports and recreational land or facilities are surplus to requirements for the provision of alternative sports and recreational facilities at the local and sub regional level taking into account the borough's assessment of need in accordance with London Plan Policy S5.

6.2 Policy in relation to sports and recreation land, buildings and facilities is set out in the NPPF (para. 99) and London Plan Policy S5.

6.3 NPPF paragraph 99 states:

“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- b) 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*
- c) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.*

6.4 London Plan Policy S5 (Sports and recreation facilities), Part C states:

“Existing sports and recreational land (including playing fields) and facilities for sports and recreation should be retained unless:

- 1) An assessment has been undertaken which clearly shows the sports and recreational land or facilities to be surplus to requirements (for the existing and alternative sports and recreational provision) at the local and sub-regional level. Where published, a borough's assessment of need for sports and recreation facilities should inform this assessment; or*
- 2) 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*
- 3) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”*

Assessment

6.5 The purpose of NPPF para.99 and London Plan Policy S5 is to retain existing buildings, land and facilities for sports and recreation use unless one of the three criteria can be met.

6.6 The lawful use of the application site (land within the red line application boundary) is a golf centre and driving range. However, this land within the application site does not comprise the whole of the golf course or the driving range and as a result of the fire there is no building or facility on the application site for sport and recreation use.

6.7 The land within the application red line boundary currently comprises the following as shown on the aerial photograph below:

- access from Brockley Hill
- car park
- the structure of the golf clubhouse following the fire
- part of the former driving range; and
- remains of the former putting green



Aerial Photograph of Existing Site – Fire Damaged Structure Highly Visible & Fly-Tipping (Google 2021)

6.8 The application site area (within the red line planning application boundary) is 1.63ha. Excluding the car park and vehicular access from Brockley Hill, the remainder of the application site that would be lost to sports use is 1.17ha. The majority of this land comprises part of the driving range.

- 6.9 The remainder of the golf course (5.33ha) is outside of the red line planning application boundary, will not be built on and therefore the use of that land will not be lost from sport or recreational use. If the landowner so wished, the site could re-open as a golf course with a small shed to supply golf balls and clubs as was proposed with planning permission ref: APP/M5450W/18/3201017 or these could be supplied from the banqueting facility reception or office.
- 6.10 The NPPF and LP Policy S5 are intended to deal with a complete or substantial loss of sports land, buildings or facilities. The proposals will only result in a very limited technical loss of sports land mostly comprising part of the former driving range (the loss of which has previously been accepted) and the remains of the clubhouse that is not even a useable facility on the site. The weight to be given to this loss is considered to be very limited given that the former clubhouse building is no longer useable and that the vast majority of the land that made up the former golf centre (that is outside of the application boundary) will not be built on and will remain in sports and recreation use.
- 6.11 There are other considerations that support giving very limited weight to the very small loss of sports land:
- (a) No longer a need for the golf driving range and adequate similar facilities
 - (b) Planning permission already granted for the change of use of the clubhouse and loss of the driving range
 - (c) Alternative sports provision
- a) No longer a need for the golf driving range and adequate similar facilities**
- 6.12 The applicant has already demonstrated in para 6.25 and Appendix 4 of the Planning Statement that there is not an identified need for golf driving ranges or golf courses in the Borough. The Harrow Outdoor Sports Strategy (2012) does not cover golf which indicates that there is not considered to be a need for golf facilities in the Borough, as also indicated by the Inspector in the 2018 appeal decision (refer to section 3 and Appendix 1 of the Planning Statement and below). Officers in paras. 6.2.57 to 6.2.59 of the committee report concur with this view that there no longer a need for the facility and there are adequate similar facilities which offer equivalent provision.
- b) Planning permission already granted for change of use of the clubhouse and loss of the driving range**
- 6.13 Planning permission has previously been granted for the change of use of the clubhouse / driving range to residential use, that would have resulted in the loss of the clubhouse and driving range (Appeal ref: APP/M5450W/18/3201017). The development included a small, detached building at the side for use as a replacement golf reception building. Full details are provided in section 3 and Appendix 4 of the Planning Statement.
- 6.14 In that decision the Inspector considered the potential impact of the closure of the driving range on 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.

6.15 The planning permission granted by the inspector is no longer extant, nor could it have been implemented following the fire at the clubhouse. However, it is a material consideration that the loss of the use of the clubhouse land and driving range for the purposes of sports and recreation has been established in the recent planning history of the land.

c) Alternative sports provision

6.16 The applicant has reviewed the Council's Outdoor Sports Strategy (2012) and the Indoor Sports Facility Strategy (2018-26) to identify which sports facilities there is a requirement for in the Borough. Sport England prepared three evidence base documents to support the London Plan (2021): Artificial Grass Pitch Provision; Provision for Swimming Pools; and Provision for Sports Halls, which have also been reviewed. An Assessment of the requirement for facilities for Indoor and Outdoor Sports is provided in Appendix 3 along with an assessment of the suitability of the application site for those facilities that are required in the Borough.

6.17 The Assessment identifies that there is a shortfall of one MUGA and three floodlight Synthetic Turf Pitches in the Borough, and demonstrates that the usable part of the application site would not be suitable for the provision of any of these.

6.18 The two types of indoor sports facilities for which there could be a future need in Harrow are indoor swimming pools and sports halls. The assessment demonstrates why the usable part of the application site would not be suitable for an indoor swimming pool or sports hall.

Summary

6.19 Whilst there will be a technical breach of NPPF para. 99 and London Plan Policy S5 in that there will be a very small loss of sports land, the land outside of the application site will not lose its sports use. The weight to be given to this loss should be very limited given that the former clubhouse building is no longer useable and that the vast majority of the land that made up the former golf centre (that is outside of the application boundary) will still remain in sports and recreation use.

6.20 The applicant has demonstrated, and the Council has accepted that there are a number of other driving ranges and golf courses within a five mile radius of the site; the loss of the driving range has previously been accepted by a Planning Inspector; and the land within the application site is not suitable for any of the indoor or outdoor sports facilities or buildings where there is an identified need in Harrow. As such the small loss of sports land only results in very limited, technical harm to the provision of sport and recreation land, buildings and facilities in the Borough.

7.0 Summary and Conclusion

- 7.1 This supplementary Statement has addressed all of the Council's proposed reasons for refusal in the officer's report to committee and addendum report dated 30th June 2021.
- 7.2 The Statement acknowledges that the proposed development is inappropriate development which is by definition harmful to the Green Belt. However, the Statement has demonstrated that '*very special circumstances*' exist as the harm to the Green Belt and limited harm through the partial loss of the driving range is clearly outweighed by other considerations that are unique to the planning application site and application proposals. As such the VSC necessary to justify the development proposed have been demonstrated and planning permission should be approved.
- 7.3 A Parking Management Plan has been prepared that demonstrates that overspill car parking could be accommodated on site and secured by s106 Agreement to overcome the proposed second reason for refusal.
- 7.4 An Archaeological Evaluation (trenching) has been undertaken where no in-situ archaeological deposits were found. No further investigations are required. The investigations undertaken and results obtained have fully addressed the Council's proposed third reason for refusal.
- 7.5 A technical note from Tyler Grange concludes that there is no reptile presence on the site post-fire and as such no defensible reason for refusal attributable to impacts to biodiversity or ecological networks (fourth reason for refusal). The required mitigation and enhancement, including significant net gains for biodiversity, can be secured through appropriately worded planning conditions.
- 7.6 There would be a very limited loss of land used for sports, but the remainder of the wider site would remain in sports and recreation use. There are sufficient alternative golf course and driving range facilities in the Borough and the application site is not suitable for any other indoor or outdoor sports facilities for which there is an outstanding need. The very limited technical breach of policy is substantially outweighed by the benefits of the proposed development.
- 7.7 None of the proposed reasons for refusal are therefore reasonable in light of the evidence presented. The planning application accords with policies in the development plan and the NPPF as a whole. Where there is a technical breach of policy, this is outweighed by other considerations that mean that there are "very special circumstances" justifying the grant of planning permission. A grant of planning permission would also be consistent with all three pillars of sustainable development: social, economic and environmental. Conversely, a refusal of planning permission would be contrary to these pillars, most notably the social pillar given the essential role that this replacement facility would have in providing the necessary social and cultural infrastructure for the diverse communities of Harrow. As such officers are respectfully requested to re-consider their assessment of the scheme and amend their recommendation in favour of the grant of planning permission.



Appendix 1: Email to the London Borough of Harrow re former Debenhams Site

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----- Forwarded message -----

From: **Richard Henley** <rhenley@hghconsulting.com>

Date: Wed, 1 Sept 2021 at 08:28

Subject: Re: Item 1/01: Stanmore & Edgware Golf Centre, Brockley Hill, Stanmore (P/3088/20): Alternative Site Search - Former Debenhams, Central Harrow

To: James Garside <James.Garside@harrow.gov.uk>

Cc: Jill Bell <jbell@hghconsulting.com>, Beverley Kuchar <Beverley.Kuchar@harrow.gov.uk>, Bettina Aneke <Bettina.Aneke@harrow.gov.uk>

James

Good morning and trust you are keeping well

You have asked us to look into the viability, suitability and deliverability of the former Debenhams Department store as an alternative site for the relocation of the banqueting facility following resident and political pressure.

Apologise for the delayed response on this, but I wanted to speak with the agent Tony Chamberlain of Chamberlain Commercial who is marketing the site and has been away on leave to get an accurate and up to date understanding of the site's potential for a banqueting use. For the reasons outlined below the property is not suitable nor viable for a banqueting use and therefore I don't consider that there is a need to formally update the Site Search document, and for this to be reported to Members in the update report ahead of the November Committee.

I attach for your information a copy of the marketing brochure, which first and foremost clearly states that the building is 'To Let' and not for sale. Furthermore, the following should be noted:

- 1. Lease Term:** 53 year lease remaining. This is short in commercial terms and presents a higher risk for a commercial operator to secure finance against for capital works etc.
- 2. Ground / First Floor - Retail Operator:** The ground and first floor are currently in the final stages of legal contract for a rental to a niche retail concessions department store operator. Contacts should be finalised with a week/fortnight.
- 3. Floorarea Requirement:** The top floor (2nd floor) is c.5,575sqm (60,000 sq ft). This is far larger than the required size for the banqueting facility (approximately 1,400sqm). Sub-letting of the floor could lead to problematic interface of uses if this floor was further sub-let.
- 4. Capital Investment:** The building needs approximately £1M of capital investment to make the site safe, secure and ready for an alternative use. The freeholders are resisting this level of investment presently and without it operator risk is high for the reasons stated above.
- 5. Car Parking:** this is critically important for a banqueting facility. Of particular note is that there is no car parking spaces with the commercial rental, principally being that the rear car parking area is owned by LB Harrow and not the freeholder. Consequently, there is no certainty or control for a prospective tenant that parking will be available for visitors/guests. There is no parking to the front with double yellow lines and any existing / proposed bays will be for specific (un)loading in connection with the GF/FF retail use and not for banqueting access. Furthermore, the Council's car park site has been identified for future redevelopment which would place the Applicant effectively in the same position as currently and significant business/operational risk. Despite the town centre location and very good accessibility, as with the current Premier Banqueting site in Wealdstone, parking is required for this type of use as very few visitors will attend in their fineries for a wedding by foot, cycle or public transport.
- 6. Floor to Ceiling Heights:** as set out in the DAS there is a requirement for the banqueting facility to have good headroom of a minimum of 5m for lighting and sound rigs, air conditioning and the appreciation of space. The ceiling heights on 2nd floor of the former Debenhams building have been confirmed by Tony Chamberlain as being between 3.6 - 3.8m. This is too low for banqueting purposes and would discount the location on this basis.
- 7. Rear Entrance:** with the proposed retail uses on the ground and first floors, this will be the primary access for pedestrians at the front of the building. Access to the second floor would be from the rear, which is undesirable (with no street presence) and raise issues of security and safety. This further reinforces that this is an inferior location for a banqueting facility.

For the above reasons, the former Debenhams store in central Harrow is not appropriate for the relocation of the Premier Banqueting business. In fact the owners looked at this site with the Leader and Cllr Ferry at the time the need to relocate from Peel Road was identified (c.5 years ago). For many of the reasons outlined above, which still remain today, the site was discounted by the Applicant as a viable alternative proposition for relocation.

Should you require any clarification on the above then I would be happy to seek to provide this or request it from Tony Chamberlain (commercial agent).

Please confirm receipt and that the above reasoning *"puts this matter to bed"* as part of the alternative site assessment of this element of the Brockley Hill proposals.

kind regards

Richard

Richard Henley

Director

The logo for HGH Consulting, consisting of the lowercase letters 'hgh' in white on a red square background.

Planning, Environment &
Development

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On Tue, 24 Aug 2021 at 10:07, James Garside <James.Garside@harrow.gov.uk> wrote:

Dear Richard,

Thank you for the update.

Can I please also ask for an update on the request to consider the Debenhams site through the sequential assessment (attached)? This is being raised by residents and members and so we do need to address this before going back to committee.

Thanks,

James

TO LET

A UNIQUE COMMERCIAL OPPORTUNITY IN HARROW TOWN CENTRE

THE DEBENHAMS BUILDING

275-287 Station Road, Harrow, HA1 1NA



- **221,788 Sq Ft (20,604.11 Sq M)**
- **Former Department Store**
- **60,000 sq ft Floorplates**
- **Multi Break-Up Potential**
- **Short Term Use Considered**
- **Excellent Loading Facilities**
- **Adjacent to Public Car Park**
- **Ideal Leisure Use**

For further information please contact:

Tony Chamberlain , Chamberlain Commercial (UK) Ltd
Unit 10, Bradburys Court, Lyon Road, Harrow, Middx HA1 2BY

Phone: 020 8429 6899.

Email: tony@chamberlaincommercial.com

Web: www.chamberlaincommercial.com



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COMMERCIAL

TO LET

A UNIQUE COMMERCIAL OPPORTUNITY IN HARROW TOWN CENTRE

THE DEBENHAMS BUILDING

275-287 Station Road, Harrow, HA1 1NA

LOCATION

Harrow is a large North West London Borough, located 3 miles from Wembley, 6 miles from Brent Cross and 14 miles from Central London. The former Debenhams building occupies a prime position in the town centre with significant frontage on Station Road and close to Harrow-on-the-Hill station, St Anns & St Georges shopping centres.

Harrow is undergoing significant regeneration with over 1,000 new apartments currently being delivered within the core town centre area.

DESCRIPTION

The former Debenhams building presents a unique town centre opportunity for large floor space use. The property offers over 220,000 sq ft spreading over 6 floors, with 60,000 sq ft floorplates. The building is adjacent to Harrow's primary public car park and benefits from excellent loading facilities via its own secure yard with multiple tailgate docking bays. Internally the store has generous floor to ceiling height, multiple passenger lifts and escalators and extensive ancillary warehousing and offices.

The property can be leased in its entirety or can be subdivided to suit an occupiers needs.

TERMS

Available to lease on terms to be agreed. Rent upon application.

Anticipated to be available from Q1 2021 and subject to vacant possession.

ENERGY RATING

An EPC will be arranged following completion of works and will be available upon request.

PLANNING

The property has a new Commercial Use Class E (effective from 1st September 2020) allowing it to be used for retail, gym, restaurant, offices, industrial, healthcare or indoor recreation. Other uses such as may be possible, subject to local authority approval.

VIEWINGS

Viewing strictly by prior arrangement. Please contact joint sole agents;

Tony Chamberlain 07817 077077
tony@chamberlaincommercial or Gary Darrell 07967
697904 gdarrell@savills & Olly Eades 07811 683198
oeades@savills.com

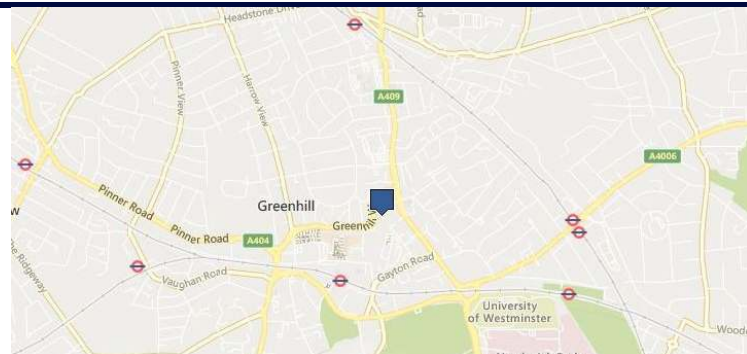


photo 2



Appendix 2: Letter from the International Siddhashram Shakti Centre

23rd Sep 2021

To Whom It May Concern,

We have known the owners of Premier Banqueting for a number of years who have continued to provide the venue for charitable causes in support of the local community.

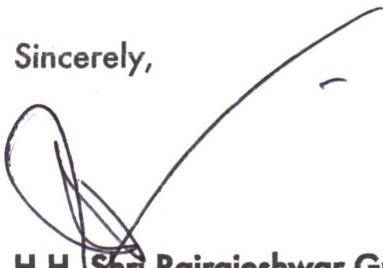
The venue in its nature is unique as its large capacity, within the large Hindu community of Harrow and caters for the unique requirements needed.

Harrow severely lacks a local community hall which is widespread across all communities and when we have these gatherings the requirements are niche which only Premier Banqueting has been able to fulfil.

As well as allowing religious events, its uniquely placed to provide religious weddings and charitable events.

There is not one venue in Harrow which can fulfil all the requirements Premier Banqueting can provide.

Sincerely,



H.H. Shri Rajrajeshwar Guruji
Founder & Spiritual Leader





Appendix 3: Assessment of Alternative Sports Provision

Supplementary Planning Statement
Appendix 3: Alternative Sports
Provision

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



hghconsulting.com



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1.0 Introduction

- 1.1 This report provides an assessment of the need for facilities for indoor and outdoor sports in the London Borough of Harrow (LBH). It identifies the sports facilities for which there is a need and assesses the suitability of the planning application site at the former Stanmore and Edgware Golf Centre to provide these facilities. The report forms an Appendix to the “*Former Stanmore and Edgware Golf Centre – Supplementary Planning Statement (September 2021)*” and should be read in conjunction with that Statement.
- 1.2 The applicant has reviewed the LBH Outdoor Sports Strategy (2012) and the Indoor Sports Facility Strategy (2018-26) to identify which sports facilities there is a need for in the Borough.
- 1.3 Sport England prepared three evidence base documents to support the London Plan (2021) – Artificial Grass Pitch Provision, Provision for Swimming Pools and Provision for Sports Halls which have also been reviewed.

Application Site

- 1.4 Full details of the planning application site are provided within the other documentation that has been submitted in support of the planning application. For ease of reference an aerial photograph of the site location is shown below.



Aerial Photograph of Existing Site

- 1.5 The application site area (within the red line planning application boundary) is 1.63ha. When the car park and vehicular access from Brockley Hill are excluded, this only leaves the area to the north of the car park within the red line (an area of approximately 1.17ha).

2.0 Outdoor Sports Provision

2.1 The Harrow Outdoor Sports Strategy (2012) assesses the supply and demand for outdoor sports facilities within the borough. The requirement for facilities for each sport is summarised in the table below.

Sport	Requirement for facilities
Football	At the time of the report lack of football pitches to meet demand for grassroots youth football but can use some senior pitches. Sufficient senior pitches. Not an apparent overall shortfall in the provision of grass football pitches to meet current and future demand. Concerns around the quality of existing pitches and changing accommodation. Lack of suitable 5-a-side facilities frustrating the development of disability football in the Borough.
Cricket	Provision of cricket facilities in the Borough in terms of quantity and accessibility is adequate to meet current and forecast needs. Concerns re quality of pitches and facilities.
Rugby	Sufficient adult pitches to meet current and forecast demand to 2017.
Bowls	Sufficient facilities but need improving. Issues such as decline in membership and funding.
Tennis	Large number of tennis courts, majority private members. Issues identified by clubs is that they would like floodlighting but have seen objections from neighbours and difficulty in obtaining planning permission. Some Local Authority park-based courts require refurbishment but there is a sufficient supply of accessible courts or alternatively they could be converted to Multi Use Games Areas (MUGA's). Recommended accessibility time 15 minutes walking time.
MUGA	Shortfall of one MUGA in the Borough. Recommended accessibility time to a MUGA is 15 minutes walking time. Refurbishing and converting derelict tennis courts within the borough could achieve demand.
Synthetic Turf Pitch	Shortfall of 3 floodlit STP with community access suitable for use for competitive hockey alongside other sports and on-site management to ensure financial viability and to maintain quality.

2.2 The Outdoor Sports Strategy therefore suggests that there is a shortfall of one MUGA in the Borough (does not specify which sport this should be designed for) and three floodlit Synthetic Turf Pitches that would be used for a range of sports including hockey and football.

2.3 The “*Strategic Assessment of Need for Artificial Grass Pitch Provision in London 2017-2041*” (September 2017) concluded that in Harrow there are only a few areas in the walking catchment area of an Artificial Grass Pitch (AGP) (20min / 1 mile catchment) and that overall, there is a significant amount of unmet demand for the provision of AGPs.

- 2.4 The application site is not large enough to accommodate a full size synthetic turf pitch. It is acknowledged that the site is of a sufficient size to accommodate a single MUGA, as identified in the Outdoor Sports Strategy. However, the application site is not considered suitable for alternative sports provision for a number of reasons.
- 2.5 The site's location in the north of the borough is not highly accessible to most of its residents. Moreover, the topography of the site results in level differences and site levelling would be required and retaining structures constructed. There would be noise and disturbance impacts that would be difficult to control with the facility open late at night with multiple change-over times throughout the day. Sport England guidance requires fencing and rebound boards and kickboards with weldmesh cladding. In allowing a previous planning appeal on the site (ref: APP/M5450/W/18/3201017) the Inspector considered that the removal of the driving range fence and tall metal pylons would enhance the openness of the Green Belt. The erection of fencing, rebound boards and kickboards would conversely have a negative impact on the visual openness of the Green Belt and is not considered to be in keeping with the character of the area.
- 2.6 The area of the application site (outside of the car park and access to Brockley Hill) would therefore not be suitable for the provision of a MUGA or three STP's / ATP's.

3.0 Indoor Sports Provision

3.1 The Harrow Indoor Sports Facilities Strategy 2018-2026 (January 2018) identifies and assesses the provision of the following indoors sports facilities: swimming pools; sports halls; health and fitness suites; squash courts; indoor tennis centres; bowls; climbing walls; gymnastics centres and artificial grass pitches. A summary is presented in the table below.

Indoor Sport / Facility	Requirement for facility
Swimming pool	Retain at least the overall water space there is at present to meet projected demand for swimming. Requirement to upgrade existing pools. Provision of teacher / learner pools at a minimum of two sites would create a better balance.
Sports halls	Demand exceeds supply. The Council should seek to accommodate unmet demand for sports halls at educational sites. Sports halls should have at least 3 indoor courts in one space plus reception, toilets and changing facilities.
Health and fitness suites	Good level of supply including low cost providers.
Squash courts	No requirement for increased squash provision.
Tennis centres	No requirement identified.
Bowls	Current provision meeting existing needs and no requirement identified.
Climbing walls	No evidence to suggest additional indoor climbing walls required in the Borough.
Gymnastics centres	A requirement to investigate additional facilities for gymnastics in the Borough.
Artificial grass pitches	Increase in outdoor AGP could reduce use of indoor sports halls for five-a-side pitches.

3.2 The Outdoor Sports Facilities Strategy suggests that there is generally an adequate supply of swimming pool facilities at the Borough level, but these could be upgraded (including Harrow Leisure Centre) and there could be a better distribution. There is unmet demand for sports halls, however it is considered that existing sports halls at educational sites could be used to meet unmet demand. The largest identified shortfall in the provision of sports halls and swimming pools is to the south of the Borough.

- 3.3 The Strategic Assessment of Need for Swimming Pools Provision in London 2017-41 (September 2017) concludes that London-wide the demand for swimming is greater than supply in 2017 and 2041. The unmet demand comes from lack of capacity, and demand coming from outside the catchment of a swimming pool where residents have difficulty accessing a pool. The study found that Harrow had quite a high % of imported visits (where the nearest pool for a resident in a neighbouring Borough was located in Harrow) in 2017 and 2041.
- 3.4 The Strategic Assessment of Need for Sports Halls Provision in London 2017-41 (September 2017) concludes that overall in London the demand for sports halls exceeds supply both in 2017 and 2041 and that the average capacity of sports halls in Harrow is 100%. The assessment considers that the scale of unmet demand for sports halls can be met, in part, by increasing access to sports halls on educational sites which currently have no or limited access for community use. This would allow re-distribution of demand across more venues, reducing the pressures on the capacities of sports halls, especially at the venues in the London Boroughs where the sports halls are estimated to be very full at peak times.
- 3.5 The two types of indoor sports facilities for which there could be a future need in Harrow are indoor swimming pools and sports halls. The site is not considered to be suitable for an indoor swimming pool or sports hall.
- 3.6 A swimming pool and / or sports hall would require a large building in the Green Belt that would not fall within any exceptions in para's 149 and 150 of the NPPF and would therefore be inappropriate development in the Green Belt. It is very unlikely that a "very special circumstances" case could be made for a swimming pool building and/or sports hall. Moreover, it is unlikely that a building for a swimming pool and / or sports hall would be as discreet or as attractive as the proposed banqueting facility and as such would cause a greater degree of harm to the Green Belt than the proposed development.
- 3.7 Swimming pools and sports halls are typically open from early morning until late evening which would result in noise and disturbance from comings and goings every day of the week. There would be a significant number of vehicular movements associated with a swimming pool and / or a sports hall with changeovers for sessions every half an hour to an hour. Given the site's location, it is unlikely that many visitors would walk or cycle.
- 3.8 The typical catchment for a swimming pool or sports hall according to the Harrow Indoor Sports Study is 20 minutes walking distance. As shown in Figure's 5 and 7 of the Indoor Sports Assessment the application site is already within walking catchment of two indoor sports facilities that have a swimming pool and sports hall. The largest need for these facilities is in the south of the Borough. The site is not accessible within a 20 minute walk for these residents.
- 3.9 The above concludes that the application site is not suitable for an indoor swimming pool or an indoor sports hall.



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