

Harrow Gospel Hall Trust

**Planning Statement – Rev B
265 Ridgeway**

June 2020

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1. Introduction

1.1 Daniel Watney LLP has been instructed by the Harrow Gospel Hall Trust to submit a planning application for the mixed-use redevelopment of 265 The Ridgeway, HA2.

1.2 Supported by this Planning Statement, floorplans and elevations, and a full suite of design and environmental surveys and assessments, this planning application proposes the following:

“Demolition of existing building and redevelopment to provide a mixed-use scheme in buildings ranging from 3 – 7 storeys, delivering D1 floorspace alongside residential accommodation, with associated open space, landscaping, access, car parking, cycle parking and other associated works.”

1.3 This Statement outlines the site and surrounding context in terms of planning policy, planning history and the proposed scheme. It then goes on to set out all planning considerations and the ways in which the proposal complies with policy aspirations at a national, regional and local level.

1.4 In summary, the delivery of much needed housing on this suitable and available brownfield site is embedded within local, regional and national planning policy and guidance. The design of the proposal has evolved through rigorous pre-application engagement and collaboration with Officers over the last 18 months, including several meetings with local planning officers, two sessions with the Design Review Panel, a GLA pre-application meeting, public consultation exercises and a presentation to the Major Development Panel.

1.5 This application is supported by:

- Full set of architectural plans, elevations and sections, prepared by Tate Hindle;
- Air Quality Assessment, undertaken by RSK;
- Arboricultural Impact Assessment, undertaken by Macintyre Trees;
- Car Park Design and Management Plan, undertaken by Velocity;
- Daylight and Sunlight Assessment, undertaken by Point 2 Surveyors;
- Delivery and Servicing Plan, undertaken by Velocity;
- Design and Access Statement, incorporating Landscaping Statement, undertaken by Tate Hindle and Outer Space;
- Draft Travel Plan, undertaken by Velocity;
- Energy and Sustainability Statement, undertaken by Mecserve;
- Flood Risk and Drainage Strategy, undertaken by MTC;
- Noise Impact Assessment, undertaken by RSK;
- Overheating Assessment, undertaken by Mecserve;
- Planning Statement, undertaken by Daniel Watney;
- Preliminary Ecological Appraisal, undertaken by Ecology by Design;
- Preliminary Risk Assessment, undertaken by RSK;
- Statement of Community Involvement, undertaken by Marengo Communications;
- Transport Assessment, undertaken by Velocity;
- Utilities and Services Report, undertaken by MTC.

1.6 The Coronavirus Act gained royal assent in March 2020 granting a range of emergency powers to the Government to handle the 2020 pandemic, including aspects relating to town planning. These powers which are in force until May 2021 states that given the restrictive measures on public movement during the pandemic, the submission of planning application documents can be made solely online to be published on the Council's website, rather than hard copies needing to be made available at Council offices or local libraries. This application is therefore made electronically.

1.7 The Act also allows for public meetings to be undertaken remotely including video conferencing, live webcast and live interactive streaming to take place, if restrictions on public movement remain in place.

2. Site Description

- 2.1 The site at 265 The Ridgeway measures approximately 1.4 hectares and is located towards the south-west of the London Borough of Harrow.
- 2.2 The brownfield parcel of land currently contains a single storey building in its south-western corner, formerly used as a religious meeting hall until February 2017, with the remainder of the site comprising extensive levels of hardstanding utilised as car parking (approximately 250 spaces). The extent of the site is identified in Figure 1 below.



Figure 1 – Satellite Imagery with Red Line Site Boundary

- 2.3 The site is bound at its three edges by varying characteristics. To the west of the site, an area of vegetation separates the site from The Ridgeway, whilst the southern edge of the site is bounded by the railway serving the Metropolitan Line. The northern boundary separates the site from the West Harrow allotments.
- 2.4 The nearest residential properties to the site are located to the west, with the rear gardens of properties along Fernbrook Drive located 55 metres away (65 metres to the rear of the building lines). To the north, the nearest residential property is located approximately 60 metres from the site boundary which is located along The Ridgeway, whilst beyond, the rear gardens of those properties situated on Elm Drive are approximately 125 metres from the site boundary.
- 2.5 The existing building on-site is not listed, nor does the site fall within a Conservation Area. The nearest listed building is over 400 metres from the site boundary which is the Church of St Peter listed at Grade II, whilst the nearest Conservation Area is over 600 metres from the site boundary comprising the Rayners Lane Conservation Area.
- 2.6 The wider site is principally residential in character along with open green spaces provided by the allotments to the north and West Harrow Recreation Ground to the south / south-east.
- 2.7 The site is located approximately 400 metres from West Harrow station albeit there is not currently a direct route to the station from the site. Currently, pedestrian access to the station is via West Harrow Recreation Ground or through the West Harrow allotments, both of which take approximately 10 minutes. The Ridgeway is served by the H11 bus route which connects the site to Harrow Town Centre, Pinner, Northwood and Batchworth Heath.
- 2.8 The site benefits from a Public Transport Accessibility Level (PTAL) of 1a to 2, on a scale from 0 to 6b where 6b is the highest. In terms of flood risk, the site lies within Flood Zone 1.

3. Planning History

3.1 Daniel Watney LLP has reviewed the planning history for the site using LB Harrow's online portal and other records. The relevant planning history for the site is outlined in Table 1 below.

Reference	Description	Decision	Date
P/1139/20	EIA Screening Opinion to determine whether an Environmental Impact Assessment is required for up to 178 residential units and 900 m2 D1 facility.	ES not required	24 April 2020
WEST/489/95	Outline application for football ground, terrace and stand, artificial pitch / tennis courts, sports hall, club house, floodlights, access and parking.	Refused	31 January 1996
WEST/654/96/OUT	Detached single storey building to provide meeting hall with access and parking.	Granted	11 February 1997
WEST/321/97/FUL	Detached single storey building to provide meeting hall with access and parking and junior football pitch with access and parking.	Granted	11 December 1997

3.2 Planning application WEST/489/95 formed part of a wider site area including the nearby allotments and was refused in January 1996 for the following reasons:

- (i) The overflow parking resulting during busy periods of usage of the development would generate conditions prejudicial to local residential amenity, highway safety and free flow of traffic;
- (ii) The activities generated by the proposal together with floodlighting would result in noise and disturbance prejudicial to the amenities of local residents;
- (iii) The proposals result in a loss of green space which is prejudicial to the character of the area.

3.3 Subsequent to this refusal, the Harrow Gospel Hall Trust purchased the site to provide a meeting hall for religious purposes which was constructed following the approval of full planning permission in December 1997 (WEST/321/97/FUL).

3.4 A Screening Opinion was sought from LB Harrow in March 2020 as to whether the proposed development would likely have significant effects on the environment and therefore require an Environmental Statement. It was concluded on 24 April 2020 by the Council that the development is not likely to have significant effects on the wider environment and therefore would not constitute EIA development. The application has thus been submitted on this basis.

4. Proposed Works

4.1 This planning application seeks the demolition of the existing building on site and redevelopment to deliver a mixed-use scheme comprising a D1 use alongside residential accommodation.

4.2 The proposed description of development is as follows:

“Demolition of existing building and redevelopment to provide a mixed-use scheme in buildings ranging from 3 – 7 storeys, delivering D1 floorspace alongside residential accommodation, with associated open space, landscaping, access, car parking, cycle parking and other associated works.”

4.3 The drawings submitted with this planning application show the demolition of existing building and a redevelopment to provide a mixed use scheme in buildings ranging from 3 – 7 storeys, delivering 900 sqm of Class D1 floorspace alongside 178 residential units, with associated open space, landscaping, access, car parking, cycle parking and other associated works.

4.4 It is proposed that 40% of the units will be affordable. The proposed mix of housing is 73 x 1-beds (41% of total), 76 x 2-beds (43% of the total), 25 x 3-beds (14% of the total) and 4 x 4-beds (2% of the total).

4.5 A range of unit types will be provided across the site including houses, maisonettes and apartments.

4.6 The development is proposed to be car-lite providing 72 car parking spaces inclusive of 5 disabled parking spaces. The scheme will deliver 325 long-stay and 8 short-stay cycle parking spaces within both dedicated cycle stores and within the public realm.

4.7 The development will be framed by a landscape context with a central area of green public open space to be delivered to provide a range of spaces for residents and the wider community to enjoy. There will also be a range of further communal and private open spaces across the site including at podium level for future residents.

4.8 It is proposed to provide an extension to the existing footpath link in the south-eastern corner of the site (see Figure 2 below). Currently there is a pedestrian and cycle right of way through the West Harrow allotments, connecting from West Harrow station in the east to The Ridgeway in the west, as identified in the below figure.

4.9 It is proposed to extend this link through this planning application to provide an alternative route for the wider public and also provide more direct access for future residents to West Harrow Station indicatively identified in blue below.



Figure 2 – Foot Path Link to West Harrow Station

5. Pre Application Engagement

- 5.1 This scheme has evolved through extensive pre-application engagement especially with the London Borough of Harrow, but also with the Greater London Authority.
- 5.2 An initial pre-application meeting was held with LB Harrow on 4th October 2018 with written pre-application advice provided under reference P/3873/18/PREAPP, principally to discuss the principle of a residential-led redevelopment of this brownfield site.
- 5.3 A Planning Performance Agreement (PPA) was signed between the Applicant and LB Harrow in July 2019 and a number of pre-application meetings and design-focused workshops have been held with Officers on the following dates:
- 13th May 2019;
 - 11th June 2019;
 - 2nd July 2019;
 - 1st August 2019;
 - 30th September 2019;
 - 11th October 2019;
 - 14th November 2019;
 - 16th December 2019;
 - 14th January 2020;
 - 28th February 2020;
- 5.4 Further to the above, two Design Review Panels were also held on 3rd September 2019 and 21st October 2019.
- 5.5 A pre-application meeting was held with the GLA on 23rd January 2020.
- 5.6 Across the 16th and 17th October, a public exhibition was held on-site to invite local residents and stakeholders to view the proposals and provide comments. Further meetings were held with local stakeholders throughout the pre-application process including local groups and Ward Councillors. The full details of these events and meetings are held within the Statement of Community Involvement submitted with this planning application.
- 5.7 The proposals were presented to the LB Harrow Major Development Panel on 19th November 2019.

6. Planning Policy Context

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that if regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the Plan, unless material considerations indicate otherwise.

6.2 The Development Plan for the site currently comprises the following documents:

- LB Harrow Core Strategy (2012), Development Management Policies Local Plan (2013), and Site Allocations Local Plan (2013), and adopted Policies Map (2013);
- Harrow and Wealdstone Area Action Plan (2013); and
- Consolidated London Plan, adopted March 2016.

6.3 There are a range of policy documents and guidance that will form material considerations in the determination of this planning application including the National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG), the draft new London Plan which is expected to be adopted by the time a decision is made on this planning application, and various Supplementary Planning Documents (SPDs) and Guidance (SPGs) adopted by both LB Harrow and the GLA.

6.4 Figure 3 below comprises an extract from the LB Harrow Policies Map.

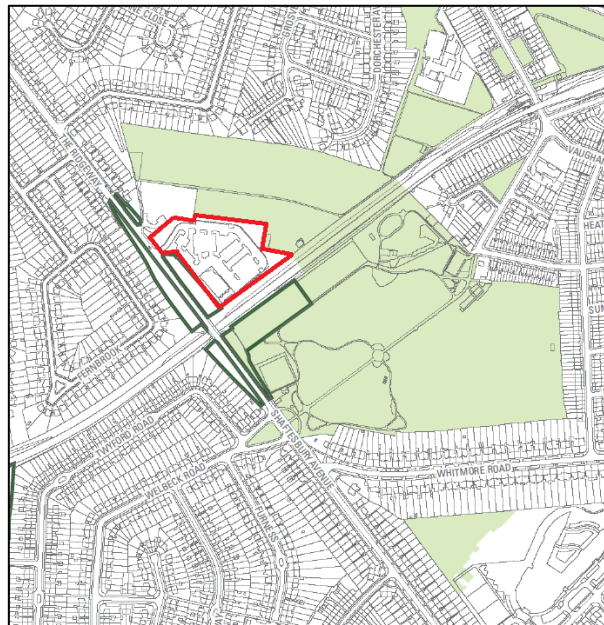


Figure 3 – Policy Map Excerpt

6.5 The extract shows the site outlined in red, added to the Policies Map for clarity, alongside the nearby Designated Open Space in green shading and Sites Important for Nature Conservation (SINC) outlined in dark green. The extract does not show that the site also lies within the North Harrow and Rayners Lane Sub-Area, the RAF Northolt Safeguarding Zone, and a Critical Drainage Area.

7. Development Plan Considerations

Principle of Development

- 7.1 The NPPF seeks to achieve sustainable development through the planning system – specifically through the paragraphs of Section 11 which sets out how to make the most effective use of land.
- 7.2 Paragraph 117 states that planning policies and decisions should promote an effective use of land, in a way that “makes as much use as possible of previously-developed or ‘brownfield’ land”, while Paragraph 118 asks that decision-makers “*give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs*”.
- 7.3 Limb d) of this paragraph also highlights the support that should be given to the development of under-utilised land and buildings.
- 7.4 Core Policy 1 of the Core Strategy seeks to amongst other things, where relevant to this proposal:
- (4) Increase provision of open space;
 - (5) Enhance residents’ access to open space, health care;
 - (6) Deliver a minimum of 6,050 net additional homes;
 - (7) Delivery homes which are affordable, accessible and meet their occupiers’ needs;
 - (15) Manage and mitigate flood risk; and
 - (17) Deliver the infrastructure needed to support growth.
- 7.5 Policy CS5 relates to the Rayners Lane and North Harrow sub-area of which the site lies within. Limb h) of Policy CS5 requires new development to enhance access to, and the quality of, local parks and open spaces as part of the Borough’s Green grid; and limb i) requires the redevelopment of identified, previously developed sites to collectively contribute towards the Borough’s housing allocation.
- 7.6 This planning application seeks to reuse a large site comprising previously developed land and intensify the use through a mixed-use redevelopment scheme. The site is under-utilised having not been occupied since early 2017 and principally comprises hardstanding as car parking. The scheme provides a significant quantum of housing including affordable alongside community use, vast amounts of open space and provides a range of infrastructure works on site to improve the immediate and wider environment delivering a number of the key objectives of the NPPF and local policy.

Residential Development

- 7.7 LB Harrow’s Spatial Vision, as set out within the adopted Core Strategy, sees the delivery of over 6,000 homes up to the plan period and with this target considered a minimum within Policy CS1. Regionally, the Consolidated London Plan of 2016 set an annual housing target of 593 from 2015 to 2025 – almost double the amount LB Harrow targeted from 2012 to 2026, within a period four years shorter.
- 7.8 The current London Plan offers support for the delivery of homes on brownfield sites through Policy 3.1 and this is only increased in the Intention to Publish version of the draft London Plan. This document raises LB Harrow’s housing target still further to 802 homes per annum. While the Secretary of State has directed the Mayor not to publish this Plan without revisions, the only criticism relevant to housing policy is that it is not ambitious enough and offers too little support for residential development of suitable, available brownfield sites.
- 7.9 This view, that delivery of housing is given primacy and the appropriate level of support, is seen throughout the NPPF (2019) and is typified by the judgement within Paragraph 59 that “*significantly boosting the supply of homes*” is an objective of this government. In short, the support for housing on available brownfield land, together with the site’s location within a predominantly residential area and its character as an under-used brownfield site, mean that the principle of residential development

should be accepted.

- 7.10 Where the London Plan speaks on the principle of development, Policy 3.3 (Increasing Housing Supply) notes the potential to realise brownfield housing capacity, and Paragraph 5.95 states that *“in a city where space is increasingly at a premium, it is essential that wherever practicable brownfield sites should be recycled into new uses”*.
- 7.11 Policy 3.4 of the London Plan seeks to optimise the potential of sites whilst taking into account local context and character, design principles elsewhere in the plan and public transport accessibility.
- 7.12 The delivery of 178 residential units on this site should be seen as a significant benefit and contributor to the Borough’s annualised housing targets which are set to increase. Delivering new homes on under-utilised brownfield sites such as this one takes pressure off the release of greenfield sites across the Borough.

Community Facilities

- 7.13 Planning permission WEST/321/97/FUL included a planning condition which stated that:
- “the premises shall be used for the purpose specified on the application [meeting hall] and for no other purpose, including any other purpose in Class D1 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that order with or without modification.”*
- 7.14 It is evident that this condition ensured the planning permission was personal to the Applicant and that in the future, any change in use or user would be controlled and an alternative D1 occupier could simply not begin operating out of the building. This would allow the LPA to further assess the impact of potential other D1 users should this be proposed in the future.
- 7.15 The scheme subject to this planning application proposes a D1 medical use on-site in new premises, adjacent to the site entrance. The below paragraphs consider why the loss of the existing religious hall and introduction of a new medical facility is appropriate in policy terms, however it is clear that this planning permission if approved would supersede the above condition and that the LPA would consider through this application the acceptability of the residential-led scheme with D1 medical use.
- 7.16 It is recognised that different D1 users will have a differing degree of impact on the wider area. The existing D1 use has a particularly intensive use of the site with a meeting hall for up to 1,000 people provided on-site and associated car parking for 250 spaces. The proposed medical use would have a significantly less intensive use of the premises in terms of number of trips to and from the site, as discussed in the Transport Assessment accompanying this application, and is considered a much more appropriate D1 facility in this principally residential location.

Loss of Existing Religious Facility

- 7.17 Policy DM47 of LB Harrow’s Development Management Policies Document relates to the retention or loss of existing community facilities. Part (A) states that proposals involving the loss of an existing community, sport, or educational facility will be permitted if:
- (a) There is no longer a need for that facility (having regard to the amount of local patronage, the quality of facilities offered and the duration and extent of marketing); or,
 - (b) There are adequate similar facilities within walking distance which offer equivalent provision, or;
 - (c) The activities carried on are inconsistent and cannot be made consistent with acceptable living

conditions for nearby residents; or,

(d) The redevelopment of the site would secure an over-riding public benefit.

- 7.18 Part (B) of Policy DM47 states that proposals for the redevelopment of community facilities that secure enhanced re-provision on the site, or on another site which improves accessibility, will be supported.
- 7.19 Policy 3.16 (B) of the London Plan resists proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for re-provision. The suitability of redundant social infrastructure premises for other forms of social infrastructure for which there is a defined need in the locality should be assessed before alternative developments are considered.
- 7.20 This approach is echoed in the ITP London Plan with Policy S1(G) requiring redundant social infrastructure to be considered for full or partial use as other forms of social infrastructure before alternative developments are considered.
- 7.21 The existing religious meeting hall was constructed following the grant of planning permission in 1997. Its use has always been to serve congregation members within the local community with the hall being used every week for almost two decades. Over time however, the local congregation have moved away from the local West Harrow area to other parts of the country and the need for this meeting hall has declined.
- 7.22 The hall has not been used since February 2017 and this lack of local congregation members is the sole reason behind the Trust seeking planning permission for the redevelopment of the site. If there was still local demand for the meeting hall use, then it would have continued to operate as such.
- 7.23 Having regard specifically to Policy DM47, this relates to proposals where there is a loss of community facility. Whilst the existing religious hall is proposed to be lost, a building of the same size is proposed to be constructed for community use as part of the proposed redevelopment. This will serve a wider fraction of the local community as a medical facility and be delivered alongside a substantial quantum of residential accommodation in order to maximise the potential of this key brownfield site.
- 7.24 In respect of adopted and emerging London Plan policy, when considering the use of the existing premises solely for an alternative community use, this would not meet the requirements of national, regional or local policy and guidance of maximising development on available and suitable brownfield land. An alternative D1 use has been identified, as discussed below, and this can be appropriately accommodated alongside a residential redevelopment which will contribute significantly to LB Harrow's annual housing need.

Provision of New Medical Facility

- 7.25 Policy DM46 concerns provision of new community facilities, with part (B) noting that proposals for the provision of new community facilities will be supported where:
- a) They are located within the community that they are intended to serve;
 - b) Subject to (a) they are safe and located in an area of good public transport accessibility or in town centres; and,
 - c) There would be no adverse impact on residential amenity (see Policy DM1) or highway safety.
- 7.26 Policy 3.16 of the London Plan supports development proposals which provide high quality social infrastructure, whilst Policy 3.17 supports the provision of high quality health and social care, appropriate for a growing and changing population, particularly in areas of under-provision where there are particular needs.
- 7.27 Part (B) of Policy 3.17 states that development proposals which provide high quality health and social

care facilities will be supported in areas of identified need, particularly in places easily accessible by public transport, cycling and walking.

- 7.28 ITP London Plan Policy S1(C) reinforces this support for development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies.
- 7.29 ITP London Plan Policy S2(B) states that development proposals that support the provision of high quality new and enhanced health and social care facilities to meet identified need and new models of care should be supported.
- 7.30 The EIA Screening submission made under application P/1139/20 considered the baseline conditions for local healthcare, outlining that the 34 GP surgeries within 2 miles of the site have an average of 12 patients per GP below the best practice ratio of 1 GP to 1,800 patients and that all GP surgeries are accepting new patients. It was however recognised that the 5 nearest GP surgeries to the application site are well in excess of the best practice ratio of 1 GP to 1,800 patients.
- 7.31 Reviewing these figures in greater detail for the most local GP surgeries to the application site as follows:
- The Ridgeway Surgery has 15,891 patients and five GPs, at an average of 3,178 patients per GP;
 - Welbeck Road Surgery has 24,026 patients and 11 GPs, at an average of 2,184 patients per GP;
 - The Shaftesbury Medical Centre has 5,022 patients and two GPs, at an average of 2,511 patients per GP;
 - St Peter's Medical Centre has 8,249 patients and four GPs, at an average of 2,062 patients per GP;
 - Pinner Road Surgery has 4,341 patients and two GPs, at an average of 2,170 patients per GP;
- 7.32 Across the five surgeries detailed above, a total of 57,529 patients are registered at the five practices containing 24 GPs, at an average of 2,397 patients per GP which is in excess of the best practice ratio of 1 GP per 1,800 patients.
- 7.33 Using the GLA's population yield calculator, the proposed redevelopment would generate between 380 – 400 residents which is the equivalent of around 0.2 of a GP's capacity.
- 7.34 Whilst all these surgeries are accepting new patients, it is clear there is a local need for additional medical facilities to serve both the existing local community and also the residents of the scheme subject to this planning application.
- 7.35 Therefore whilst as a standalone scheme, the population density could be accommodated within nearby surgeries as they are all accepting new patients, there is an acute need locally and the closest surgeries to the planning application site are currently oversubscribed.
- 7.36 The planning application includes for a 900 sqm medical facility to improve the local medical offer and accommodate some of the local demand of the existing community and the future residents.
- 7.37 Initial discussions have been held with The Ridgeway Surgery as part of their wider primary care network who have confirmed that they are initially interested in taking the space. It is expected that these discussions will continue throughout the course of the planning application and we would hope that interest remains to either relocate into purpose built premises on the planning application site, or that further medical provision can be accommodated on this site to assist with the local need.
- 7.38 To summarise the position with regards to the community use, there is no conflict with adopted or emerging planning policy. There is no loss of community floorspace proposed through this planning application. There is no longer a need for a religious meeting hall on this site as the local congregation have moved away from the local area, whilst there is a need for additional medical facilities based on local statistics and population data.

Affordable Housing

- 7.39 CS1(j) sets a borough wide target for 40% of all new homes to be affordable. Policy DM24 also states that priority will be given to the delivery of affordable family housing, alongside other considerations determining housing mix. London Plan Policies 3.11 and 3.12; set out the Mayor's priority for affordable housing across the capital, and the responsibility for Local Planning Authorities to deliver affordable homes to meet London's need.
- 7.40 Emerging Policy H5 relates to the threshold approach to affordable housing and the need to interrogate an affordable housing provision through viability discussions – a process first enshrined in the Mayor's Affordable Housing and Viability SPG (2017). Policy H5 asks that 35% affordable housing be proposed, if a scheme is to forgo a viability exercise, and as the proposal includes a policy compliant amount and mix of affordable homes this requirement has been met.
- 7.41 This application proposes to offer 40% affordable housing, by habitable room, including a varied mix and location, including family sized units. The provision complies with the relevant policy and should be seen as a significant benefit of the scheme.

Housing Mix

- 7.42 Consolidated London Plan Policy 3.8 concerns housing choice and asks that developments offer a range of housing choices in terms of sizes and types. Policy DM24 requires development proposals to secure an appropriate mix of housing on site to contribute towards the creation of inclusive and mixed communities. The policy specifies that the appropriate mix of housing will be determined having regard to:
- The target mix for affordable housing, set out in the Council's Planning Obligations SPD;
 - The priority to be afforded to the delivery of affordable family housing; and
 - The location of the site, the character of its surroundings and the need to optimise housing output on previously developed land.
- 7.43 The scheme itself provides a mix of housing, of both sizes and types given that the scheme includes houses alongside stacked maisonettes alongside blocks of flats. The eventual mix, with a balance towards one bedroom homes, has resulted from a lengthy and collaborative design process with the Council and the GLA.
- 7.44 The design of the development has ensured the site can sustain the density proposed in terms of amenity space and parking provision, while delivering the optimum amount of homes on this currently under-utilised brownfield site.
- 7.45 As a result the proposed housing mix reflects these considerations, as well as the delivery of a policy compliant affordable housing provision, and should be considered acceptable.

Design and Townscape

- 7.46 Paragraph 131 of the NPPF states that great weight should be given to outstanding and innovative design, exemplifying the support given to well designed development. Furthermore, while taking this into account, the Framework also includes paragraph 123 which sets out that it is important for planning policies and decisions to avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.
- 7.47 Turning to the London Plan, Policy 7.1 broadly seeks the comprehensive design of developments to achieve what the Mayor describes as "lifetime neighbourhoods". Policy 7.2 expands on this by requiring development to achieve the highest standards of accessible and inclusive design, while Policy 7.4 supports development which reflects and improves local character – espousing the need for the regard to the pattern and grain of existing spaces, a positive relationship with the urban structure and natural landscape, and ensuring development is human in scale. Policy 7.6 then asks development to make a positive contribution to coherent public realm, streetscape and wider cityscape. This is similarly

required by local Policy DM1 which asks that all development achieve a high standard of design and layout including achieving high standards of privacy and amenity.

7.48 The argument is not repeated here in full, given it is set out in length through the design and access statement which forms part of this submission, although it cannot be overstated that the proposal has been the subject of extensive and comprehensive pre-application discussion, not to mention public consultation. The form, layout, scale, setting and landscaping have been the subject of intense work over the course of more than a year, and the project team has collaborated with the Council throughout.

7.49 The result has been a development which illustrates clearly the principles of good design as set out locally and regionally. In particular, this complies with the approach expected by London Plan Policy D3 which requires the optimisation of site capacity through a design-led process.

7.50 Additionally, and for completeness, the scheme complies with emerging London Plan Policy HC1 as there is no harm caused to any heritage asset.

Open Space and Amenity Space

7.51 Policy DM19 supports major development proposals where they make provision for new open spaces and enhancements to existing open spaces, which meet the needs of the occupiers of the development and contribute to the mitigation of identified deficiencies in the quantity, quality and accessibility of open space. LB Harrow's local recommended standards of provision for all relevant typologies of open space have been fully taken into consideration.

7.52 The landscaping aspects of the scheme have taken the forefront in the design process thus far, where achieving the optimum density for the site has been an exercise in determining what quality of landscaping and amenity space can be delivered alongside the proposed quantum of housing. At the core of the development are two large 'village green' spaces, the main entrance is designed as a large arrival courtyard, and at the south eastern corner of the site the blocked flats are broken up with areas of podium amenity space, supplemented still further with shared courtyards at the centre of each 'pair' of maisonettes and houses. The priority that has been given to delivering a high quality landscaped environment and commendable amount of open space must be considered a significant benefit of the development, and this is even more so given that the existing site offers no public space or similar amenity – as a largely hard surfaced car park.

7.53 Turning to amenity space, Policy DM27 requires residential development proposals to provide appropriate amenity spaces informed by the Mayor's London Housing Design Guide and having regard to:

- The location and dwelling mix;
- The likely needs of future occupiers of the development;
- The character and pattern of existing development in the area;
- The need to safeguard the privacy and amenity of neighbouring occupiers; and,
- The quality of the space proposed including landscaping.

7.54 The Mayor's housing standards also require private amenity of 5m² for each new home, alongside the provision of communal amenity space. The development delivers a large amount of communal amenity space, at ground floor level and supplemented at podium level, meeting the relevant standards of provision. Naturally, private amenity space has been provided for each new dwelling – meeting and exceeding the required standards, dependent on the typology of the relevant unit (i.e. the homes along the northern boundary are afforded generous gardens).

Play Space

7.55 Policy DM28 requires residential development to provide children and young people's play facilities on-site.

- 7.56 In line with the Mayor’s SPG for Play and Informal Recreation, as well as London Plan Policy 3.6, the amount of play space required has been calculated using the GLA’s population yield calculator (version 3.2).
- 7.57 This results in a requirement of 623m² for 0-10 year olds and 128m² for 11-15 year olds.
- 7.58 660m² is provided for the 0-10 age bracket, exceeding the requirement, and 620m² is provided for the 11-15 bracket – almost five times the amount required by policy.
- 7.59 The comfort with which this has been achieved is a testament to the design credentials of the proposal where landscaping, open space and amenity space are considered. Again, this should be considered a significant benefit of the scheme.

Transport and Access

- 7.60 The NPPF promotes integration of planning and transport and its aims are to promote more sustainable travel choices, promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and to reduce the need to travel, particularly by car.
- 7.61 London Plan Policy 6.1 echoes this approach and sets out that the Mayor seeks to encourage patterns of development which reduce the need to travel by car.
- 7.62 Locally, Policy DM42(A) requires proposals to make on-site provision for parking in line with the London Plan standards including maximum standards for car parking and minimum standards for cycle parking. This policy also requires electric vehicle charging and disabled parking spaces also in line with the London Plan.
- 7.63 A detailed transport analysis can be found in the Transport Assessment which accompanies this submission and should be read alongside the Delivery & Servicing Plan, draft Travel Plan, Car Park Design and Management Plan and draft Construction Logistics Plan.
- 7.64 The development however complies with the regional and national approach to reduce reliance on the private car and promote sustainable methods of transport. The site is located close to the Metropolitan Line of the London Underground, and would deliver improved access to this method of transport through the building of a new link to the east of site.
- 7.65 The proposed development has been designed in mind of the Healthy Streets principles and follows the transport principles of Good Growth as set out in the Mayor’s Transport Strategy in that:
- The proposed development is a suitably located high-density and mixed use development;
 - Provides good access to public transport;
 - Encourages people to choose to walk and cycle;
 - Is inclusive and accessible, encourages carbon-free travel; and
 - Has a strategy for efficient on-site delivery and servicing.
- 7.66 The existing site access is proposed to be retained for vehicles and pedestrians, whilst a new access to the eastern corner of the site will be opened for pedestrian and cyclists only which would provide a more direct route to West Harrow Station as well as improving the site’s overall PTAL score.
- 7.67 The development will deliver 72 car parking spaces at a ratio of 0.4 spaces per unit. This includes five Blue Badge parking spaces within the site. The site delivers a total of 333 cycle parking spaces within cycle stores at the ground floor of each residential block and within the public realm.
- 7.68 In terms of trip generation, whilst the proposed development site will result in an increase of 16 and 17 vehicular trips in the morning and evening peaks respectively, when compared with the existing use of the site there will be an overall reduction in potential vehicle trips across the day by 94 less vehicles.

7.69 The Transport Assessment submitted with this application has thoroughly reviewed the existing conditions and associated transport impacts of the proposal, demonstrating that the proposed development will have a negligible transport impact and contribute significantly and positively to the improved permeability of the site resulting in wider transport benefits.

Air Quality

7.70 Paragraph 181 of the NPPF requires planning policies and decisions to sustain and contribute towards compliance with the relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.

7.71 ITP London Plan Policy SI1 requires development proposals to not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits, or create unacceptable risk of high levels of exposure to poor air quality.

7.72 An Air Quality Assessment accompanies this application prepared by RSK, which reviews the existing air quality in the area and impacts in respect of relevant legislation, policy and guidance.

7.73 The assessment identifies that because the development is expected to result in a net reduction in the number of vehicles utilising the local road network, no on-site combustion sources are proposed, and the car park is not expected to have a materially adverse effect on air quality at existing receptor locations, it is not envisaged that the scheme would have a significant adverse effect on air quality.

7.74 To assess the effects of potentially poor ambient air quality on future site users, the air quality at the proposed development site was modelled using the ADMS Roads Extra dispersion modelling software. No exceedances of the assessed air quality standards (AQSS) were identified. The proposed development was also found to be air quality neutral in accordance with the MOL SPG and based on this, mitigation measures are not required.

Sustainability and Energy

7.75 An Energy & Sustainability Statement has been undertaken to inform the scheme and submitted with this planning application. The Statement has been prepared in line with the GLA guidance and follows the energy hierarchy of Be Lean, Be Clean, Be Green.

7.76 Policy DM12 relates to sustainable design and layout and requires proposals to take reasonable steps to secure a sustainable design and layout, including appropriate measures to reduce carbon dioxide emissions from developments. Policy DM13 encourages proposals for decentralised energy networks whilst Policy DM14 requires development proposals to incorporate renewable energy technology where feasible.

7.77 The energy strategy for the site is to reduce the energy demand as much as possible in the first instance through prioritising passive design measures. Any remaining demand will be met by a single energy centre utilising Ground Source Heat Pumps (GSHPs) with boreholes drilled across the site. This energy centre will supply heating to all the blocks on site, including the non-domestic elements of the scheme, at a low temperature. A Water Source Heat PUMP (WSHP) unit within each dwelling will then raise this to the required temperature for heating. The energy centre is also designed such that it can be connected to any potential future district heating system provided in the area.

7.78 The following passive and active energy efficiency features have been considered in the strategy for the proposed development:

- The thermal performance of the proposed building fabric will exceed Part L minimum requirements in terms of U-values and airtightness;
- The detailed design will follow robust construction details to ensure insulation continuity for minimising thermal bridging;

- Mechanical Ventilation with Heat Recovery will be installed to make use of wasted heat of exhaust air by preheating incoming air;
- A low Window to Wall ration in combination with solar control glass of low g-value is proposed throughout the scheme to limit solar gains and tackle the risk of overheating;
- Light fittings of low energy types will be specified throughout the scheme.

7.79 The following renewable energy technologies are proposed for this redevelopment:

- Both space heating and hot water demand of the scheme will be provided by GSHPs;
- PV panels on the roof of each block will generate renewable energy on site.

7.80 The measures held within the strategy demonstrate that the scheme achieves significant carbon savings that exceed both the Building Regulations' Target Emission Rate and the London Plan Target Reduction in terms of CO2 emissions.

Flood Risk

7.81 The application is accompanied by a Flood Risk Assessment and Drainage Strategy completed by MTC. This assessment identifies that the only flood risk to the site comes from surface water flooding from the adjacent drain in extreme events (1 in 100 years), whereby the water level at the site would be 51.75m AOD, whilst the floor level of the proposed dwellings will be set 300mm above this water level at 52.05m AOD.

7.82 An area of proposed access road and the public open space will be lowered, and will provide compensation for any loss in flood storage as a result of the proposed development. The overall compensatory flood storage to be provided at the development is 47.4m³ thus with the loss being 32m³, the overall gain in compensatory flood storage at the site will be approximately 15.4m³.

7.83 All surface water from the proposed development will be adequately treated in line with requirements prior to discharge from the site.

7.84 Foul discharge from the proposed development will be to the Thames Water foul sewer located on Fernbrook Drive as requested by Thames Water.

7.85 The Sustainable Drainage Strategy provided successfully demonstrates that a workable solution for managing surface water in accordance with requirements is available.

Daylight and Sunlight

7.86 This application is accompanied by a daylight and sunlight assessment prepared by Point 2 Surveyors to consider the potential effects to the surrounding residential properties as a result of the scheme. The assessments contained within that report have been undertaken in accordance with the BRE Guidelines entitled 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice'.

7.87 The VSC methodology demonstrates full BRE compliance, commensurate with the BRE's permissible 20% from former value.

7.88 In relation to the NSL methodology, the results demonstrate full BRE compliance, commensurate with the permissible 20% from former value.

7.89 The sunlight methodology, APSH, demonstrates full BRE compliance (commensurate with the permissible 20% from former value).

7.90 In terms of the ADF assessment, the results demonstrate that 128 out of 132 rooms (97%) will meet or

exceed the application of the BRE Guidelines. Where there are rooms that are unable to meet the strict application of the BRE Guidelines, this is in all instances a product of providing private amenity spaces in the form of projecting balconies which limit the view of unobstructed sky.

7.91 The Sun Hours on Ground assessment demonstrates that all but 1 of the main amenity spaces will far exceed the BRE's suggested target values.

7.92 Overall, the technical assessments that have been undertaken demonstrate that the proposed development will relate very well with the neighbouring buildings in terms of daylight and sunlight matters.

Trees and Ecology

7.93 Policy DM20 requires new development to retain and enhance any significant features of biodiversity value within the site. Policy DM21 seeks to provide opportunities to enhance locally important habitats and support locally important species through a number of measures including:

- Green corridors and green chains;
- Gardens, including planting for wildlife, green roofs and green walls;
- Landscaping, including trees, hedgerows of historical or ecological importance and ponds;
- Allotments; and
- Habitat creation, such as nesting and roosting boxes.

7.94 Policy DM22 requires development proposals to provide hard and soft landscaping that is appropriate to the character of the area, is well laid out, achieves a suitable visual setting for the building, provides for sufficient space for new or existing trees and planting to grow.

7.95 Emerging Policy G5 requires major development proposals to contribute towards the greening of London through the inclusion of urban greening through building design including high quality landscaping, tree planting, green roofs, green walls and nature-based sustainable drainage.

7.96 This submission is supported by an arboricultural impact assessment and tree survey, as well a preliminary ecological appraisal. These documents demonstrate that through the measures they set out there would be no harm to the environment or any reduction in ecological value held by the site currently.

7.97 Further, the development itself will achieve significant uplifts in ecological value and tree coverage by providing increased soft landscaping throughout the site. The existing site principally comprises concrete hardstanding which provides no ecological benefits.

7.98 Emerging Policy G5 sets a target Urban Greening score of 0.4 for developments that are predominantly residential through a range of green infrastructure options such as street trees, green roofs, sustainable drainage systems and the like. As detailed further in the Design and Access Statement accompanying this application, the proposed scheme meets the Urban Greening requirements of the ITP London Plan through a range of measures adopted across the site, principally the landscape spine running through the scheme along with green roofs.

Ground Contamination

7.99 Policy DM15 requires proposals to assess the risk posed by potential land contamination.

7.100 The site has remained largely undeveloped for its entire history, forming open land up until the early 1930s and then forming part of a wider open space until the existing meeting hall was constructed in 1999.

7.101 The application is accompanied by a Preliminary Risk Assessment undertaken by RSK which examines

the potential of any contaminant linkages on the site. The Assessment provides recommendations for further assessment of the site to address risks identified within the report and to address remaining uncertainties. It is expected that these further assessments shall be secured by planning condition.

Planning Obligations

7.102 It is expected that discussions will be progressed during the course of the planning application as to any planning obligations that may be required to be delivered through this scheme. It is currently expected that any future legal agreement will include the following Heads of Terms:

- Provision of 40% affordable housing;
- Provision of pedestrian link to existing footpath on land owned by London Borough of Harrow;
- Carbon offset contribution;
- Monitoring and legal fees.

7.103 Policy DM50 requires planning obligations to be sought on a scheme-by-scheme basis to secure the provision of affordable housing in relation to residential development schemes, and to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal. A policy compliant level of affordable housing is proposed, and this will be secured through s106 agreement.

8. Summary

8.1 This planning application has been prepared following an extensive programme of pre-application consultation with the Local Planning Authority and has been informed by key stakeholders including the Design Review Panel, the Major Development Panel and the GLA.

8.2 We are firmly of the opinion that the scheme is in accordance with the adopted Development Plan as a whole, as considered at length in Section 7 above and therefore planning permission should be granted without delay.

8.3 Notwithstanding, there are a vast range of benefits being delivered by the scheme which should further weigh in favour of the application, including:

- Delivery of 178 new homes on brownfield land;
- Provision of 40% of these as genuinely affordable products;
- Delivery of a brand new medical facility specifically for an identified local need;
- Provision of a new link through to West Harrow Station which will be a benefit for both future residents and also the wider public.
- Provision of a range of public open spaces throughout the site for the benefit of future residents and the wider community;
- Significant financial contributions to local infrastructure in the form of CIL payments;
- Vast environmental improvements as a result of the proposed development, from the existing situation which is predominantly concrete hardstanding to a landscape led redevelopment incorporating various SUDS and environmental improvements.