

Development, Enterprise and Environment

Olive Slattery

Principal Planning Officer
Harrow Council
PO Box 37
Civic Centre
Station Road
London HA1 2UY

Our ref: D&P/3825/GC/02

Your ref: P/1619/16

Date: 5 July 2016

Dear Mrs Slattery,

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008 5-11 and 37-41 Palmerston Road and 27-31 Mason's Avenue and land adjacent to 47 Mason's Avenue, London HA3 7RR
Local Planning Authority reference: P/1619/16**

I refer to the copy of the above planning application, which was received from you on 4 May 2016. On 5 July 2016, the Mayor considered a report on this proposal, reference D&P/3825/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that whilst the scheme is broadly supported in strategic planning terms, the application does not yet fully comply with the London Plan for the reasons set out in paragraph 62 of the above-mentioned report. Moreover, the Mayor encourages further discussion between the applicant and the respective Planning and Housing departments of Harrow Council and the GLA with a view to achieving a 50% provision of affordable housing on a habitable room basis.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Rachel Yorke, e-mail rachelyorke@tfl.gov.uk, telephone 020 3054 7030.

Yours sincerely,

Colin Wilson

Senior Manager – Development & Projects

cc Navin Shah, London Assembly Constituency Member
Tony Devenish, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL
Joe Haines, Savills, 33 Margaret Street, London W1G 0JD

Deller and Palmerston Road site, Wealdstone

in the London Borough of Harrow

planning application no. P/1619/16

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Residential-led mixed use redevelopment to provide 187 residential units, 1,428 sq.m. of office floorspace and 683 sq.m. of flexible commercial/community floorspace, within five buildings of between 1 and 17-storeys.

The applicant

The applicant is **Origin Housing**, and the architect is **MOSS Architecture**.

Strategic issues

Opportunity Area: the high density residential-led mixed use redevelopment would capitalise on the opportunity presented by this highly accessible yet underutilised Housing Zone site, and the proposal is strongly supported in strategic planning terms (paragraph 15 to 18).

Employment: the proposed shift from general industry to office-led small business workspace is supported. An employment management plan should be secured via Section 106 to secure a flexible and accessible package of workspace terms for small to medium sized enterprises (paragraph 19 to 22).

Housing: the housing provision (including 42% affordable by habitable room) is broadly supported subject to verification of the maximum reasonable amount of affordable (paragraphs 23 to 31).

Design: the proposed design and public realm provision is broadly supported, and this prominent scheme would act as a beacon of regeneration for Wealdstone. Further discussion is nevertheless sought with a view to optimising the generosity and legibility of routes through the site (paragraphs 32 to 39).

Transport: whilst the scheme is generally acceptable in strategic transport terms, there are still various detailed transport matters to resolve (paragraphs 44 to 57).

Recommendation

That Harrow Council be advised that whilst the scheme is broadly supported in strategic planning terms, the application does not yet fully comply with the London Plan for the reasons set out in paragraph 62 of this report. The resolution of those issues could, nevertheless, lead to the application becoming compliant with the London Plan.

Context

1 On 4 May 2016 the Mayor of London received documents from Harrow Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor had until 14 June 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. However, in this case it has been agreed with Harrow Council that the Mayor will provide this statement on 5 July 2016. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following categories of the Schedule to the Order 2008:

- 1A 1. *“Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats”*; and,
- 1C 1.(c) *“Development which comprises or includes the erection of a building of... more than 30 metres high and is outside the City of London”*.

3 Once Harrow Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The site is located at the edge of Wealdstone town centre, on the south side of the Palmerston Road/George Gange Way roundabout. The site forms part of Harrow and Wealdstone Opportunity Area and Harrow Housing Zone.

6 The proposed development plot is bisected by the George Gange Way flyover (which over-sails the site). The flyover supports footway and one lane of traffic in each direction, and links Wealdstone with Harrow town centre (via Station Road).

7 Designated as local employment land, the site is largely cleared with the exception of a number of commercial/industrial buildings (including two single-storey commercial premises in use on Masons Avenue), and a terrace of three two-storey houses (fronting Palmerston Road), let privately on a short-term basis by the applicant.

8 The surrounding context is of a predominately low-rise urban character, with a rich mix of surrounding uses (including employment, commercial, residential and community). Whilst there are no designated heritage assets at the site, there are a number of Listed and Locally Listed Buildings in the vicinity, including: Harrow & Wealdstone Station, and Wealdstone Police Station (both Grade II); and, 21 The Bridge (Locally Listed).

9 The site is generally well-served by public transport, with seven bus routes available within a 200 metres radius, and rail, Underground and Overground services available from Harrow & Wealdstone Station (100 metres to the south). Overall the site registers a public transport accessibility level (PTAL) of five, on a scale of zero to six(b) – where six(b) denotes the most accessible locations in the capital.

Details of the proposal

10 Comprehensive residential-led mixed use redevelopment to provide 5 blocks up to 17-storeys to accommodate:

- 187 new residential flats (42% affordable on a habitable rooms basis); and,
- 2,111 sq.m. employment and community floorspace including an employment hub offering flexible terms for start-up businesses / small to medium-sized enterprises.

Case history

11 On 17 December 2017 GLA officers held a pre-application meeting to discuss this scheme. The advice issued on 22 January 2016 stated that *“GLA officers support the proposed residential and commercial mixed use redevelopment of this local employment site which would jointly increase housing supply and likely employment densities within the Opportunity Area. The design approach is generally well considered, and whilst the proposed building heights represent a significant juxtaposition with the context, GLA officers support the scale of ambition which responds well to Opportunity Area and Housing Zone potential, and the objective to promote the regeneration of Wealdstone town centre. The applicant should, nevertheless, ensure that the issues raised... with respect to: housing; social infrastructure; urban design; inclusive access; sustainable development; and, transport are addressed by the future application.”*

Strategic planning issues and relevant policies and guidance

12 The relevant strategic issues and corresponding policies are as follows:

- Opportunity Area *London Plan;*
- Employment *London Plan;*
- Housing *London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;*
- Affordable housing *London Plan; Housing SPG; draft Interim Housing SPG; Housing Strategy;*
- Density *London Plan; Housing SPG;*
- Social infrastructure *London Plan;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor’s Climate Change Adaptation Strategy; Mayor’s Climate Change Mitigation and Energy Strategy; Mayor’s Water Strategy; Mayor’s Ambient Noise Strategy;*
- Transport and parking *London Plan; the Mayor’s Transport Strategy;*
- Crossrail *London Plan; and, Mayoral Community Infrastructure Levy.*

13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2012 Harrow Core Strategy and Proposals Map; 2013 Harrow and Wealdstone Area Action Plan; 2013 Development Management Policies Local Plan; and, the 2016 London Plan (Consolidated with Alterations since 2011).

14 The following are also relevant material considerations: National Planning Policy Framework; Technical Guide to the National Planning Policy Framework; and, National Planning Practice Guidance.

Principle of development

15 Whilst the site is designated as local employment land by the Harrow Proposals Map, the more recently adopted Harrow and Wealdstone Area Action Plan (HWAAP) identifies the site as having potential to deliver a mixed use scheme combining employment uses with enabling housing.

16 The proposal to deliver 1,428 sq.m. of office floorspace and 683 sq.m. flexible commercial/community floorspace would result in a significant shift in the nature of employment space at this site (i.e. away from general industry, and towards office-led employment). Such a shift would effectively remove this site from the Council's protected employment land bank. However, it is also likely to deliver considerably higher employment densities. Noting that the HWAAP envisages precisely this form of employment transition in order to facilitate the wider regeneration of Wealdstone, GLA officers support the proposed employment offer in strategic planning terms.

17 Furthermore, the proposal to deliver high quality, high density housing as a complementary use is strongly supported, and would further the aims of London Plan Policy 3.3 (increasing housing supply) as well as the objective to deliver the urban renewal of Wealdstone town centre.

18 Notwithstanding this, on the understanding that a number of tenants (both commercial and residential) currently remain at the site, the applicant is strongly encouraged to maintain an open dialogue with occupiers - to ensure that they are well informed of the delivery programme.

Employment

19 As discussed above, the proposal to provide modern flexible employment space at this site is strongly supported on the basis that it is likely to yield higher employment densities (up to approximately 200 jobs) in order to support the regeneration of Wealdstone town centre.

20 The principal employment offer comprises a 1,428 sq.m. employment hub, supported by ancillary cafe and community space. The employment hub is aimed at local start-up businesses and small to medium-sized enterprises. Noting the specific characteristics of employment space supply and demand in the borough – which identifies strong localised demand for small modern office space (Harrow Employment Land Review 2010), this provision is strongly supported in line with London Plan policies 2.7 and 4.2.

21 Further to pre-application discussions, it is evident that affordability will be a key component to the success of this workspace. Whilst the applicant does not propose to directly control rental levels, it intends to enter into partnership with an established workspace provider in order to offer a flexible and accessible package of workspace terms designed to incubate and support new businesses. Such measures include: co-working space (resulting in lower equivalent rental levels per unit of occupation); flexible occupational terms (with members required to pay only for the level of services required); and, no rental deposits or financial guarantees.

22 This approach is broadly supported, and GLA officers welcome the fact that the Council proposes to secure the core principles of this provision through an employment management plan (to be secured as part of the Section 106 agreement).

Housing

23 This site forms part of the Harrow Housing Zone, which is prioritised for accelerated housing delivery with GLA funding support. As discussed in paragraph 7, there are three existing terraced houses at the site, let privately by Origin Housing on an assured shorthold tenancy basis. Further to the comments in paragraph 18 above, the proposed loss of these units in order to facilitate the wider redevelopment (which would deliver a substantial uplift of housing overall) accords with London Plan Policy 3.14.

24 The applicant proposes to provide 187 new homes at this site. The proposed quantum of housing would considerably exceed the target housing output for this site within the HWAAP, and represents 32% of Harrow Council's annual housing target overall. This provision is strongly supported in strategic planning terms in accordance with London Plan Policy 3.3 (increasing housing supply). The table below sets out the proposed residential schedule.

Unit type	Affordable rent	Intermediate	Private market	Total
One-bedroom	3	20	44	67
Two-bedroom	19	26	68	113
Three-bedroom	7	0	0	7
Total	29	46	112	187

Affordable housing

25 London Plan Policy 3.12 seeks to secure the maximum reasonable amount of affordable housing when negotiating on mixed use schemes. In this case the applicant is proposing an affordable housing provision of 40% (on a unit basis) or 42% (on a habitable room basis). The affordable housing is proposed to be provided at a balance of 40% affordable rent and 60% intermediate tenure.

26 The proposed provision of affordable housing accords with the 40% target within the Harrow Core Strategy, as well as strategic objectives for the Housing Zone, and is strongly supported. Notwithstanding this, the viability report submitted by the applicant is currently undergoing locally-led review to verify the maximum reasonable amount of affordable housing in accordance with London Plan Policy 3.12.

27 It is evident that the proposed balance of affordable tenures (weighted towards intermediate provision) does not comply with the strategic target within London Plan Policy 3.11. It is nevertheless noted that, in Wealdstone, the HWAAP seeks *"an affordable housing tenure split which favours intermediate housing"* (Policy AAP13) - in order to support mixed and balanced communities. Having regard to this local policy, and the characteristics of the housing offer more generally (which includes a 24% provision of family housing within the affordable rent component), GLA officers support the balance proposed.

Residential standards, play space and density

28 The applicant has stated that all dwellings will meet or exceed the minimum space standards established by London Plan Policy 3.5 (Table 3.3), and the submitted plans support this. The applicant has also confirmed its commitment to a 10% provision of wheelchair accessible/adaptable units. This is supported and should be secured by condition, along with Building Regulations standards M4(2) and M4(3) in line with London Plan Policy 3.8.

29 With respect to children's play space, the scheme includes a designated play area of 262 sq.m. as part of the site-wide landscaping strategy. Whilst this would meet the doorstep play

requirements of young children at the site, this provision represents a 178 sq.m. shortfall against the spatial requirements generated by the Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG. Therefore, the applicant is relying on Byron Recreation Ground (350 metres to the east) to meet the recreational needs of older children within the development. This approach is acceptable in principle, however, the Council is encouraged to seek an additional open space contribution to mitigate the intensified use of this park.

30 London Plan Policy 3.4 seeks to optimise housing potential. Noting the characteristics of this location (refer to paragraphs 5 to 9), GLA officers are of the view that this site would lend itself well to a high quality, high density mixed use development. In this case the scheme is 720 habitable rooms per hectare. This would exceed the typical range identified by the London Plan (200 to 700 habitable rooms per hectare for an urban site with a PTAL of 5), however, having regard to the setting; the Opportunity Area and Housing Zone context; the proposed residential quality and design response (refer below); and, the HWAAP objectives for the regeneration of Wealdstone, GLA officers are satisfied that this density is acceptable.

Social infrastructure

31 London Plan Policy 3.7 states that large residential developments should, where necessary, coordinate the provision of social, environmental and other infrastructure. Given the density of residential development proposed in this case, it will be important that the scheme appropriately contributes towards the infrastructure necessary to support sustainable communities. Harrow Council is ultimately best placed to identify the relevant response in this regard, and GLA officers expect an appropriate contribution to be secured through the Harrow Community Infrastructure Levy and by way of planning obligation, in addition, if necessary.

Urban design

32 This site is subject to a number of constraints which occur principally due to the impact of the George Gange Way flyover (which over-sails the site), and the irregularly shaped plots that the flyover defines on either side. The applicant has nevertheless worked through a number of design iterations with a view to addressing these constraints, and the proposed layout of the scheme is generally well considered.

33 The arrangement of buildings at the site works to establish a new pedestrian route through the site - linking Masons Avenue with Palmerston Road. This is supported in accordance with the key design principles of the HWAAP, and helps to create a coherent piece of public realm that would unify the two main development plots via a shared space under the flyover. The layout of the ground floor also works well in terms of providing consistent active frontage on to surrounding public realm.

34 The intention to provide a prominent 'gateway' to Wealdstone responds well to the character of the flyover, as well as the objective to raise the profile this district centre. Notwithstanding this, the height of the tallest buildings (up to 17-storeys) considerably exceeds site specific guidance within the HWAAP, and would represent a significant juxtaposition in scale when seen against what is predominantly a two to three-storey urban context. Nevertheless, having regard to the relationship of this site to the town centre; the characteristics of the site and the wider Opportunity Area; and, local objectives to promote the regeneration of Wealdstone town centre, GLA officers are satisfied that the proposed scale is acceptable in strategic planning terms.

35 It is noted that the taller blocks have been orientated to align with neighbouring development to the east and west of the site (rather than the flyover). This provides simple and

orthogonal spaces along the edges of the site, which can be secured as private/semiprivate residential amenity spaces. The remainder of the site, including the space underneath the flyover, is given over to public open space. This approach is broadly supported. However, officers are of the view that the plan layout and positioning of the larger block on the Dellar site currently results in 'pinch points' along the edge of the flyover, and in relation to the rear of terraced housing on Masons Avenue. Accordingly officers would welcome further investigation of how the layout, positioning and/or design of this block could be refined in order to optimise the generosity and legibility of routes through the site, and to avoid areas of potentially under-utilised public realm.

36 Further to pre-app discussions it is noted that the applicant has designed the floor to floor height of the commercial units to respond to the height of the flyover – ensuring these create a well-defined character to the commercial hub and the public space beneath the flyover. This is supported.

37 With respect to the housing component of the scheme, it is noted that ground floor units have been positioned so as to form residential mews style arrangements either side of the flyover. Individual entrances to these ground floor units are also proposed in line with the Mayor's Housing SPG. Noting also the site characteristics with respect to flood risk (refer to paragraph 42) it is evident that the distribution of residential apartments at ground floor level has been very carefully considered. This is supported.

38 In terms of residential quality, the design of the scheme and positioning of residential cores provides convenient access to blocks as well as efficient unit to core ratios. GLA officers welcome the removal of an undercroft at blocks B and C in response to pre-application comments, and particularly support the plan form of the tower elements - which provide a high proportion of dual aspect units. Whilst it is acknowledged that lower level flats on the flyover sides would be subject to potential issues of noise and air quality, based on the assessments submitted these issues appear to be capable of acceptable mitigation through conventional design and construction measures. The Council is encouraged to secure the recommended mitigation accordingly in line with London Plan policies 7.14 and 7.15.

39 In terms of architecture the applicant proposes simple building forms, with clean-lined detailing, and the use of a single pale stone facing material for the two tower elements. The applicant also proposes a semi-irregular arrangement of windows for the towers, rather than a conventional grid pattern. The lower-rise components of the scheme (fronting Masons Avenue with Palmerston Road) are proposed to be clad in brick, in order to offer a sense of transition to the surrounding context. The approach is broadly supported, and the townscape visualisations and verified views demonstrate that the buildings would be of high design quality, and would not cause harm to the character or setting of surrounding heritage assets in line with London Plan policies 7.6 and 7.8.

Inclusive access

40 The applicant has set out its response to access and inclusion within the design and access statement. GLA officers support the commitment to ensure equal and convenient access throughout the development, and welcome the public realm contribution of the scheme in particular. The applicant has committed to a 10% provision of wheelchair accessible/adaptable homes, and has provided sufficient Blue Badge parking spaces to allow for a 1:1 provision of spaces to units in this regard. This is supported, however, the applicant should provide a space-sharing strategy which confirms that tactile paving and pedestrian safe zones would be provided as necessary to ensure the safety of elderly and disabled residents and visitors using the shared

surfaces. The Council is encouraged to ensure that these principles would be incorporated and delivered as part of a space-sharing strategy, secured by way of planning condition.

Sustainable development

Energy strategy

41 For the purposes of assessing applications against the carbon dioxide savings target within London Plan Policy 5.2, the Mayor now applies a 35% reduction target beyond Part L 2013 of Building Regulations. In accordance with the principles of Policy 5.2 the applicant has submitted an energy statement for the scheme, setting out how the development proposes to reduce carbon dioxide emissions. In summary the proposed strategy comprises: energy efficiency measures (comprising a range of passive design features and demand reduction measures); a site-wide network driven by gas fired combined heat and power plant (capable of connection to a district heating network in future); and, renewable technologies (roof mounted photovoltaic panels). Based on the strategy proposed the scheme would achieve the 37% carbon dioxide saving target. This is supported in principle, however, GLA officers are seeking a number of detailed clarifications from the applicant team (with respect to efficiency standards and district networking, in particular). Officers will provide an update at the Mayor's decision making stage, following the conclusion of these discussions.

Climate change adaptation

42 The south and east of the site fall within Environment Agency Flood Zone 3, and parts of the site are also at risk of surface water flooding. It is noted that, in response to the distribution of risk at the site, ground floor commercial units are proposed (where the maximum flood depth is calculated to be 50mm). All residential units are proposed to be located at least 300mm above the 1 in 100 +20% flood level. This approach is supported in line with London Plan Policy 5.12, and notwithstanding any further advice from the Environment Agency, GLA officers are of the view that the proposals are broadly acceptable in flood risk terms.

43 The scheme includes various areas of soft landscaping and plating as part of the public realm proposals and sustainable urban drainage strategy. Attenuation tanks are also proposed to help reduce surface water runoff. This is supported in line with London Plan policies 5.10 and 5.13. However, whilst it is acknowledged that the roofscape of the scheme will need to accommodate amenity space and a photovoltaic array, the applicant is encouraged to explore whether there is any remaining space for the provision of green, brown or blue roof areas - to support biodiversity, and to further assist with rainwater attenuation.

Transport

Access

44 The site currently has two vehicular accesses (via Palmerston Road and via Masons Avenue). These will be altered to allow one access for service and refuse vehicles off Masons Avenue (slightly shifted to the east) and one access to basement parking for resident car-users, cyclists and smaller delivery vans off Palmerston Road (this is a new access, slightly further west from the current narrow at-grade access by the roundabout that is to be removed). There will also be a further gated non-vehicular entrance into the eastern part of the site off Palmerston Road.

45 Whilst the above-mentioned arrangements are supported in principle, TfL requests: a stage 1 road safety audit for the basement car park access; and, details of the levels and gradient of the two-way ramp access (as well as any gating proposed).

Servicing

46 With respect to the proposed basement parking area on the Palmerston Road plot, TfL suggests that space 55 is removed (and the adjacent two spaces moved slightly east) to allow more space for van manoeuvring. The basement headroom should also be specified.

47 Delivery vehicles up to 7.5 tonnes have been auto-tracked on Masons Avenue (entering and exiting the site) and the outcome is satisfactory. It is, however, noted that space has not been provided to allow for a refuse lorry to pull off the highway. On-street refuse collection is not ideal in this case, however, it is noted that arrangements are proposed to be addressed via a site management plan. This is acceptable, however, it is recommended that waste bins are not stored (even temporarily) on the highway - due to its narrowness in this location. The applicant has produced a framework delivery and servicing plan which would work in conjunction with the site management plan, and is broadly supported. A planning condition should be imposed to secure the submission of a detailed version of the delivery and servicing plan (for approval by the Council) prior to occupation in accordance with the London Plan policy 6.14.

Trip generation, modal split and transport impact

48 TfL notes that trip estimates by foot and (all modes of) public transport have been consolidated in one group, rather than being disaggregated. This is not acceptable because the relative impacts are obscured and cannot be singled out for proper mitigation. The applicant has provided an initial response to the request for this breakdown, however, TfL seeks a comprehensive revision employing additional and complementary data from the 2011 Census and (if possible) other surveys and analysis generated in support of other development/policy-making in the area. Given that this is in an area of identified growth, the applicant should also present trip generation figures associated with pipeline major development, i.e. "cumulative growth". Details of pipeline schemes are available from Harrow Council. TfL considers the information currently provided insufficient to make a recommendation in support of this proposal.

49 TfL considers that the capacity of Harrow and Wealdstone station would not be negatively impacted by this development. However, TfL Buses is currently reviewing the bus network in the High Street area with Harrow Council, and passenger feedback suggests that route 186 (running very close to the site) is overcrowded going north between Harrow-on-the-Hill and Harrow and Wealdstone stations during the morning and afternoon peak.

50 At the time of writing this report, two new tables of modal split information for the proposal have been received by TfL. However, these are still to be analysed. Depending on the outcome of this analysis funding (as mitigation for bus capacity) may be sought by TfL.

Walking and cycling

51 As discussed in the urban design section above, the proposed new pedestrian/cycle route through the site (linking Masons Avenue with Palmerston Road) is strongly supported. However, with the intention of maintaining the 24-hour accessibility of this connection concern is raised over the proposal to gate the development after dark. It is recognised that this is proposed as a safety and security measure. However, not precluding the advice of the Metropolitan Police in respect to 'designing out crime', the applicant is encouraged to explore

an alternative means of ensuring safety and security in a way which would not undermine the accessibility of the site – e.g. through a lighting and CCTV strategy.

52 At pre-application stage TfL advised the applicant to study cycle routing and barriers at and around the site, as well as opportunities for linking to existing cycling corridors in the area. In this regard the applicant is referred to HWAAP Policy 19, which states that all major development proposals should prioritise access by sustainable modes, with particular emphasis on the provision of safe and attractive walking routes to nearby facilities and to public transport. The severance created by the George Gange Way flyover underlines this need. Whilst the developer has submitted a Cycling Environment Review Study (CERS) and a Pedestrian Environment Review Study (PERS), TfL is of the view that the transport assessment gives too little consideration to HWAAP Policy 19 and the opportunities for enhancing the connectivity of this site. In particular, the transport assessment notes that there will be a new route through the site, but the submission lacks an adequate plan and space-sharing strategy for this (e.g. are cyclists to be allowed to cycle, or must they dismount?).

53 Both the pedestrian and cycling studies cover the area in a reasonable amount of detail, however, TfL expected a recommendation to widen the footways bordering the site to improve pedestrian comfort (particularly on the western arm of the roundabout). It is noted that the CERS suggests re-applying road markings (although more comprehensive potential improvements to cycle infrastructure are not identified). The PERS review recommends design/access/paving improvements. Plus, it identifies the opportunity to provide an enhanced crossing facility adjacent to the western part of the site, on Palmerston Road. TfL supports the CERS and PERS recommended improvements to the highway in accordance with the aims of London Plan policies 6.9 and 6.10 and requests that the development contributes towards these through Section 106 and 278 as appropriate. It is also recommended that the Council secures funding for public realm improvement, including for way-finding signage.

Parking

54 The 187 residential units are proposed to be provided with 71 basement car parking spaces (a ratio of 0.37 spaces per unit). This provision includes 23 spaces for Blue Badge holders - 19 of which will be for residents and 4 for commercial users. Clarification is nevertheless requested with respect to how parking spaces will be allocated to the 120 larger/family units and wheelchair accessible dwellings, as it is understood (and welcomed) that the studio/one-bed flats will not be given parking spaces. TfL recommends that a car parking management plan is secured by condition to address this point. TfL supports the applicant's commitment to impose a ban on local parking permits for residents of this site, and notes the locality is already part of a Controlled Parking Zone. Given the very good access to public transport TfL is of the view that the proposed parking levels could be lower still and not result in overspill - especially if the applicant implements Harrow's policy to promote car club schemes in lieu of parking provision.

55 With the exception of electric vehicle charging point provision (for which TfL requires a commitment to provision of 20% of spaces with active provision and 20% with passive), the car parking proposals as a whole are acceptable and in accordance with London Plan Policy 6.13.

56 With respect to cycle parking, it is proposed that 329 spaces will be provided (307 for residents and 22 for commercial units). This would meet London Plan standards and is supported. The spaces will be located within the basement (176 spaces) and ground floor level (153 spaces). Moreover, 5 of the 22 commercial spaces are for short stay/visitors. These are positioned at ground floor level, adjacent to commercial units for ease of use. With respect to

the basement provision, the applicant is asked to indicate what access provision (separate to the ramp) is being made for cyclists.

Travel planning and construction

57 The applicant has submitted a framework Travel Plan. Whilst this is broadly supported, the framework plan has narrowly failed its 'ATTrBuTE' assessment by TfL. The applicant has recently revised this and it is being reviewed. It should be submitted in detail for approval by the Council (in consultation with TfL) prior to determination of the application. TfL further supports the framework construction and logistics plan supplied as part of the transport assessment. This should be secured by way of planning condition, with details submitted to the Council for approval (prior to implementation) in consultation with TfL.

Mayoral community infrastructure levy

58 In accordance with London Plan Policy 8.3 the Mayoral community infrastructure levy (CIL) came into effect on 1 April 2012. All new development that creates 100 sq.m. or more additional floorspace is liable to pay the Mayoral CIL. The levy is charged at £35 per square metre of additional floor space in the London Borough of Harrow. Further details are available at: www.london.gov.uk/publication/mayoral-community-infrastructure-levy.

Local planning authority's position

59 Harrow Council is expected to formally consider the application at a planning committee meeting in September 2016.

Legal considerations

60 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

61 There are no financial considerations at this stage.

Conclusion

62 London Plan policies on Opportunity Area, employment, housing, urban design, inclusive access, sustainable development and transport are relevant to this application. Whilst the scheme is broadly supported in strategic planning terms, the application does not yet fully comply with the London Plan as set out below.

- **Opportunity Area:** the proposal to deliver a high quality, high density residential-led mixed use scheme in the Harrow and Wealdstone Opportunity Area and Housing Zone is strongly supported, and would further the aims of London Plan Policy 3.3 (increasing housing supply) as well as the HWAAP objective to deliver the urban renewal of Wealdstone town centre.
- **Employment:** the proposed shift from general industry to office-led small business workspace is supported in line with London Plan policies 2.7 and 4.2. An employment management plan should be secured via Section 106 to secure a flexible and accessible package of workspace terms - designed to incubate and support new businesses.
- **Housing:** The proposed housing provision (including 42% affordable by habitable room) is broadly supported in line with London Plan Policy 3.3 subject to verification of the maximum reasonable amount of affordable housing.
- **Urban design:** The proposed design and public realm provision is broadly supported, and this prominent scheme would act as a beacon of regeneration for Wealdstone. Further discussion is nevertheless sought with a view to optimising the generosity and legibility of routes through the site in line with London Plan Policy 7.1.
- **Inclusive access:** The proposed response to access and inclusion is broadly supported in line with London Plan Policy 7.2. However, a space-sharing strategy should be secured to detail how shared surface areas would be designed to be safe and accessible for elderly and disabled people.
- **Sustainable development:** The proposed energy strategy and climate change adaptation measures are broadly supported in strategic planning terms. Following the conclusion of discussions on the energy strategy and roofscape strategy, the Council is encouraged to secure the associated energy and adaptation details by way of planning condition in accordance with London Plan policies 5.2, 5.10, 5.11, 5.12, 5.13 and 7.19.
- **Transport:** Whilst the scheme is generally acceptable in strategic transport terms, issues with respect to: access; servicing; trip generation, modal split and transport impact; walking and cycling; parking; and, travel planning and construction should be addressed in line with London Plan policies 6.3, 6.9, 6.10, 6.13 and 6.14.

63 The resolution of the outstanding issues above could lead to the application becoming compliant with the London Plan.

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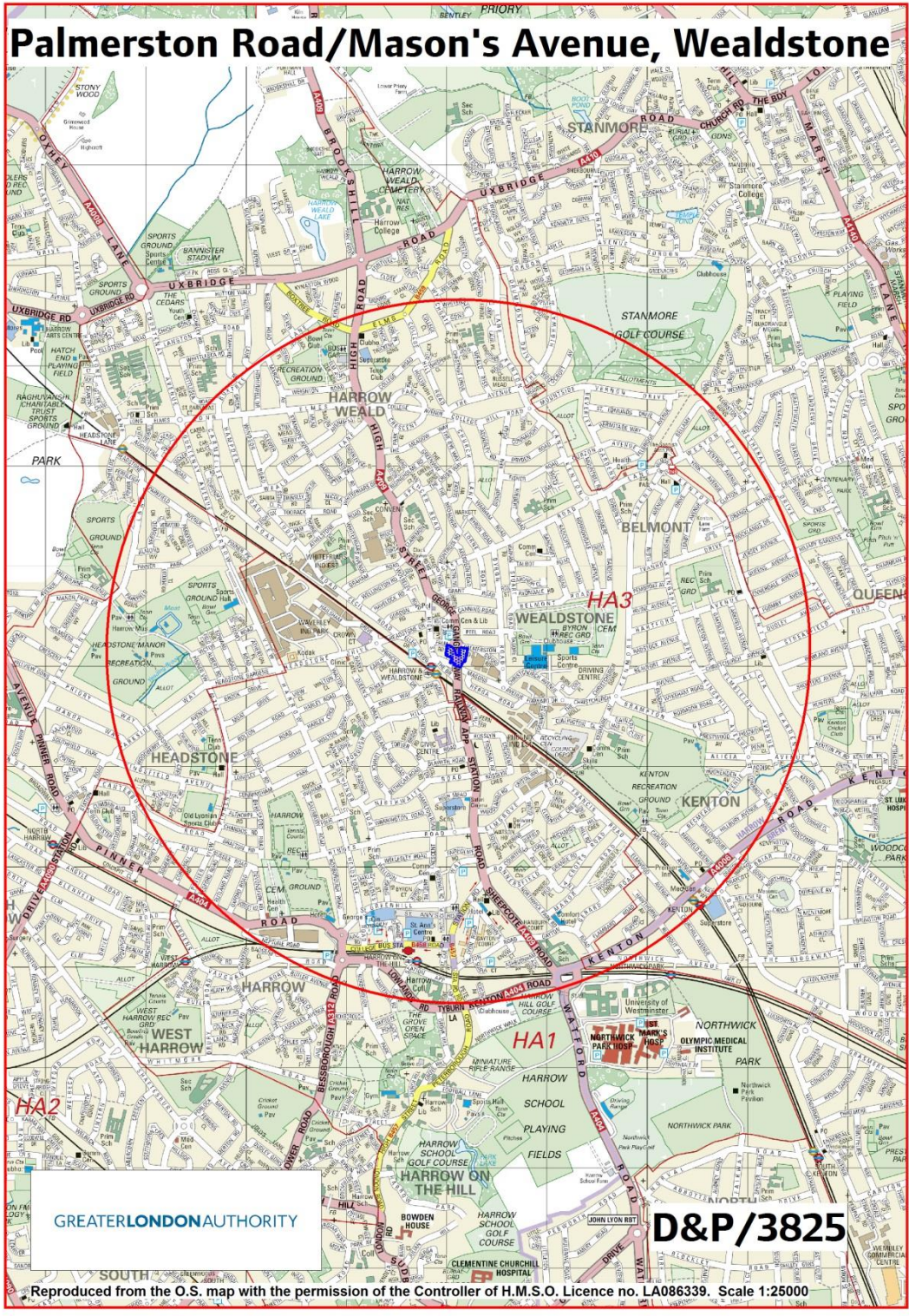
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