

Tesco store, Station Road, Harrow town centre

in the London Borough of Harrow

planning application no. P/0832/11

Strategic planning application stage II referral (new powers)

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

The proposal

Extension of an existing store to provide additional 651 sq.m. net convenience and 2,368 sq.m. net comparison floorspace, a new four storey mixed-use building to provide Class A1/A2/A3 uses and 14 residential flats, and a decked car park, landscaping and other external alterations.

The applicant

The applicant is **Tesco Stores Ltd.**, and the architect is **Michael Aukett Architects**.

Strategic issues

Strategic issues with respect to **retail, employment, housing, urban design, sustainable development** and **transport** have been resolved, and the application is now in accordance with the London Plan.

The Council's decision

In this instance Harrow Council has resolved to grant planning permission subject to conditions and written conclusion of a section 106 legal agreement.

Recommendation

That Harrow Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal.

Context

1 On 19 July 2011 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. This was referred to the Mayor under Category 3F of the Schedule to the Order 2008: *"Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use."*

2 On 18 August 2011 Sir Edward Lister, Deputy Mayor and Chief of Staff, acting under delegated authority, considered planning report PDU/2822/01, and subsequently advised Harrow Council that while the application was generally acceptable in strategic planning terms

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. Since then, the application has been revised, and on 18 January 2012 Harrow Council decided that it was minded to grant planning permission subject to conditions and written conclusion of a section 106 legal agreement, and on 20 January 2012 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged or direct Harrow Council under Article 6 to refuse the application. The Mayor has until 2 February to notify the Council of his decision and to issue any direction.

4 The decision on this case, and the reasons will be made available on the GLA's website www.london.gov.uk.

Update

5 At consultation stage Harrow Council was advised that while the application was generally acceptable in strategic planning terms the application did not comply with the London Plan for the reasons set out in paragraph 88 of the above-mentioned report; but that the possible remedies set out in paragraph 90 of that report could address these deficiencies:

- **Retail:** Whilst the proposal does not present any significant strategic concerns with regard to scale or impact, the Council should satisfy itself that the scale, sequential assessment and impact of the proposal is acceptable at the local level in line with London Plan Policy 4.7.
- **Employment:** An employment and training strategy should be developed and secured by planning condition in line with London Plan Policy 4.12.
- **Housing:** The applicant should confirm the nature of the affordable housing products proposed, and demonstrate an appropriate response to the requirement for children's play space in line with London Plan Policies 3.11, 3.4 and 3.6.
- **Urban design:** The applicant should respond to comments made regarding the Hindes Road and High Mead street frontages in line with London Plan Policies 7.1 and 7.6.
- **Sustainable development:** The applicant should address concerns regarding energy efficiency, district heating, cooling, renewable technologies and green roofs in line with London Plan Policies 5.1, 5.5, 5.9, 5.7, 5.11 and 5.13.
- **Transport:** The applicant should address concerns regarding highway capacity, car parking, cycling, walking, public transport and travel planning in line with London Plan Policies 6.12, 6.13, 6.9, 6.10, 6.3, 6.7 and 6.14.

Retail

6 Following a review of the proposals at consultation stage, officers were satisfied that the proposed scale and impact of the proposed supermarket extension did not raise concern at the strategic level. The Council has now conducted its own local assessment of the proposal (discussed in detail within the Council's committee report) and has concluded that the application is acceptable in terms of the sequential assessment, scale of retail provision, and retail impact, subject to the imposition of an appropriate condition to manage the quantum of net comparison

Employment

7 At consultation stage the applicant was encouraged to provide local employment initiatives as part of the proposals in accordance with the principles of London Plan Policy 4.12. Employment opportunities were sought to cover both the construction and operation of the development, and officers requested that associated jobs should be advertised within the local area.

8 Since these representations were made Tesco has committed to early engagement with local people through a local employment scheme to fill the 150 new jobs to be created within the extended store. The applicant has also committed to sourcing construction workers locally wherever possible.

9 The Council has agreed to secure a recruitment training and management plan within the section 106 legal agreement to ensuring that employment opportunities created during both the construction and operational phases of the development will be advertised locally. On this basis officers are content that the application accords with London Plan Policy 4.12.

Housing

10 At consultation stage the proposed 100% affordable housing provision was supported. The applicant was, however, asked to confirm the nature of the affordable housing products proposed, and demonstrate that, where necessary, an appropriate response to the requirement for children's playspace would be made to ensure accordance with London Plan policies 3.11, 3.4 and 3.6.

Tenure split

11 Following the consultation stage the applicant has confirmed that the proposal seeks to provide 100% affordable rent products as a first preference, or, 100% shared equity intermediate products where Homes and Communities Agency grant funding cannot be secured. The Council will incorporate a mechanism for managing this within the section 106 legal agreement.

12 Whilst these proposals would not accord with the strategic tenure split within London Plan Policy 3.11, given the commitment to provide 100% affordable housing, and the difficulties in providing two different affordable tenures within a scheme of this size, this approach is, on balance, acceptable.

Children's playspace

13 Whilst it was acknowledged at consultation stage that the scheme was likely to be on the threshold in terms of triggering the requirements of the Mayor's supplementary planning guidance '*Providing for Children and Young People's Play and Informal Recreation*', the applicant was asked to demonstrate how the proposal would meet the objectives of London Plan Policy 3.6 for children's play space, either on site, or through existing provision in the local area.

14 As discussed at consultation stage, using the methodology within in the Mayor's SPG, the development would be expected to have a child population of three under a wholly intermediate scenario, or fifteen under a wholly affordable rented scenario.

15 Since consultation stage the applicant has investigated opportunities for playspace provision onsite, but concluded that due to various contextual constraints (including the proximity and scale of the supermarket car park), the provision of high quality play space cannot be achieved on site. Instead, the applicant has engaged with the Council to ensure the playspace requirements of the development would be met through a financial contribution in lieu of on-site provision. A

Density

16 With respect to residential density, at consultation stage the Mayor stated that whilst there was no in principle objection to the density proposed, to be acceptable the development would need to provide high quality residential accommodation that is well designed and delivers an appropriate mix of units, sufficient play and amenity space in line with London Plan requirements, and be well designed and in context with its surroundings.

17 Matters with respect to residential quality and mix of units have been addressed at consultation stage, and are in accordance with the London Plan. Furthermore, on the basis that a financial contribution to children's play space has now been secured, and that the overall design of the scheme is broadly supported (refer to urban design section below), officers are content that the proposed density is acceptable in accordance with the principles of London Plan Policy 3.4.

Urban design

18 At consultation stage the applicant was asked to respond to comments made with respect to the Hindes Road and High Mead street frontages.

Hindes Road

19 The applicant was advised to investigate the feasibility of providing an extension of the proposed Station Road mixed-use block, to wrap around further along Hindes Road, in order to enhance the character and legibility of Hindes Road in accordance with London Plan Policy 7.1 and optimise the site's potential in line with London Plan Policy 7.6.

20 In response to this request the applicant has revisited the design of this portion of the scheme and submitted revised plans.

21 An extension of mixed-use block frontage has not been proposed, however, a new facade treatment for the decked car park has been developed to provide a sense of continuity with the adjacent mixed-use block, and to help define and activate this section of Hindes Road. The proposals include the incorporation of translucent glazed panels to allow for passive transmission of light which would provide subtle illumination of the frontage during night time hours. Officers also note that the Council has included a condition within the draft decision notice to secure the provision of public art on a portion of this frontage.

22 Having reviewed the revised plans and associated computer generated images it is evident that the revised treatment for the car park frontage would be of a high quality, and officers are content that this response would address concerns raised previously with regard to legibility and sense of place in respect to London Plan Policy 7.1. The inclusion of public art within the proposal is particularly welcome. However, it is disappointing that the applicant has been unable to provide a continuation of the mixed use block street frontage in order to optimise the potential of the site in response to representations made in respect of London Plan Policy 7.6.

23 The applicant has stated that extending the block further along Hindes Road would adversely impact on scheme viability, principally, due to the need to reduce decked car parking provision in order to provide space for the additional mixed-use footprint. The Mayor sought a reduction in car parking within his initial representations, and officers note that as part of transport negotiations the level of proposed parking provision has been reduced by ten spaces to 452 overall. This level of reduction would not, however, be sufficient to accommodate an extension of

24 On balance, whilst it is disappointing that the scheme would not provide an extension of mixed-use frontage along the length of Hindes Road, the constraints to this are acknowledged, and officers are satisfied that, within the parameters of the discussed constraints, the potential of the site has been optimised in accordance with London Plan Policy 7.6.

High Mead

25 At consultation stage the applicant was asked to improve the relationship of the northern frontage of the supermarket extension with High Mead. Officers note that the applicant has submitted revised plans to ensure the rear of the extension would now align with the building line established by the existing store. Further articulation and the use of increased glazing has also been introduced to the northern elevation of the scheme in order to provide a more engaging relationship with the buildings on the opposite side of High Mead. The revisions are supported and officers are now content that the response at this frontage is acceptable in accordance with London Plan policies 7.1 and 7.6.

Vacancy strategy

26 At consultation stage the applicant was also asked to commit to developing a vacancy strategy to avoid blank facades or empty units fronting the street while business occupiers are being found for the proposed small commercial units on Station Road.

27 Since these representations were made the applicant has engaged with the Council to examine opportunities for ensuring the proposed units would contribute to the vibrancy of Station Road from the moment they are constructed. Detailed local discussions are currently ongoing, however, officers note that the Council is seeking to impose a planning condition to secure a vacancy strategy, to be approved by the local planning authority. This is supported.

Sustainable development

28 At consultation stage the applicant was asked to address concerns with respect to energy efficiency, district heating, cooling, renewable technologies and green roofs in line with London Plan Policies 5.1, 5.5, 5.9, 5.7, 5.11 and 5.13. The applicant's response in each case is addressed under the corresponding headings below.

Energy efficiency

29 With respect to the proposed residential units the applicant has confirmed that passive design features including low energy light fittings, high level air tightness of building fabric and carefully managed glazing will be incorporated to reduce energy demand and the need for active cooling. This is supported in line with London Plan Policy 5.1.

30 At consultation stage the applicant was asked to provide modelling for both the residential and commercial spaces of the proposed development so that officers could assess the performance of the scheme against 2010 Building Regulations.

31 The applicant has since provided an updated energy and sustainability statement which contains modelling figures for both the residential and commercial floorspace. Based on the information provided officers are not satisfied that the development would exceed Building Regulations compliance through energy efficiency alone. This is disappointing, however, the modelling demonstrates that the proposal would achieve a 25% reduction in carbon dioxide emissions over Building Regulations compliance once other components of the London Plan energy hierarchy are taken into account. Officers note that the Council has agreed to secure this level of

District heating, and combined heat and power

32 At consultation stage the applicant was asked to ensure that the development would be capable of connecting to a district heating network in future. The applicant has since confirmed that the scheme will be designed to incorporate connection points so that the development would be capable of linking to a district heating network. This is supported in accordance with London Plan Policy 5.5.

33 Following further comments made at consultation stage the applicant has confirmed that the gas boiler within the existing Tesco store will be used to meet the needs of the extension. The applicant has also stated that gas boilers are intended to supply the other parts of the development, and that no electric space heating will be used. Officers are content that this is acceptable.

34 The applicant has also agreed to undertake a feasibility study to investigate options for heat recovery from supermarket refrigeration. Whilst it is noted that the existing boiler has sufficient capacity to meet the proposed heat requirements of the extended store, the investigation of this innovative approach for possible applications within the development is supported. The Council has agreed to secure the feasibility study by planning condition and officers would welcome the opportunity to review the findings of the feasibility work in due course.

Cooling

35 The applicant was asked to confirm the measures proposed to reduce the need for active cooling within the development. Measures proposed for the residential units are discussed in paragraph 29. For the supermarket the requirement for cooling is associated primarily with the refrigerant and chilled food areas. The applicant has confirmed that it intends to use robust structural fabric design to provide solar shading where appropriate and low levels of air permeability, in order to limit the requirement for additional active cooling associated with the supermarket use. This is supported in accordance with London Plan Policy 5.9.

Renewable energy

36 Following representations made at consultation stage the applicant has investigated the potential for incorporating renewable technologies on the development in order to address London Plan Policy 5.7, and meet the 25% carbon dioxide reduction target within London Plan Policy 5.2. The applicant is now proposing to install 2,143 sq.m of photovoltaic panels across the residential element and the Tesco extension. The Council has secured the associated carbon dioxide reduction by way of planning condition, and officers are satisfied the application now accords with London Plan policies 5.7 and 5.2.

Urban greening

37 Whilst the proposed provision of various soft landscaping measures were acknowledged at consultation stage, the applicant was asked to investigate the feasibility of providing a green roof as part of the scheme, in accordance with London Plan Policy 5.11. The applicant has since stated that the supermarket structure, as currently proposed, would not be capable of supporting the additional loading of a green roof, and that scheme viability prohibits the necessary measures required to deliver a green roof for this scheme.

38 Whilst this is disappointing it is noted that additional soft landscaping has been secured through a reduction in car parking spaces, and that the Council has secured a contribution of £20,000 towards the Harrow Green Grid Strategy, which seeks to deliver a network of green spaces

Sustainable urban drainage systems

39 Officers note that the Council has imposed planning conditions to secure the relevant parameters with respect to flood risk and drainage. This is supported in accordance with London Plan Policy 5.13.

Transport

40 At consultation stage a number of strategic transport issues were raised, including the level of car and cycle parking, pedestrian improvements and wayfinding, and the need to improve the travel plan and measures to reduce car travel. TfL also expressed its commitment to implementing the recommendations of the emerging Harrow and Wealdstone Area Action Plan, including the associated strategic transport study, which seeks to assess highway capacity and identify necessary mitigation measures.

Car parking

41 Following detailed discussions between the Council, the applicant and TfL, the all parties now agree that the total parking levels are acceptable in accordance with London Plan standards, reflecting the public transport accessibility level and the existing parking on site. It is important to note that TfL insisted and the applicant and Council agreed that the overall parking ratio should reflect the total increased retail floorspace and should not be additional to existing parking spaces on site. This has resulted in only a minor increase in parking spaces from 386 to 452 spaces, and a reduction of ten parking spaces over the original proposal. The application is now in accordance with London Plan Policy 6.13. In addition the number of electric vehicle charging points and spaces shall comply with Policy 6.13, and officers note that this will be secured by planning condition.

Cycling

42 There is a strong will to increase cycling in the Borough and this is supported within the emerging Area Action Plan. Following representations made at consultation stage, the level of cycle parking has been increased to reflect standards set out in London Plan Policy 6.9. This is supported.

Walking

43 Following representations made at consultation stage, a PERS assessment has now been undertaken, and the identified deficiencies will be addressed through the development proposal, and using funding secured by the Council for improvements to Borough roads, including £20,000 towards the Green Grid. A contribution of £20,000 has also been secured towards Legible London. Officers are now satisfied the application accords with London Plan Policy 6.10.

Public Transport

44 At consultation stage the applicant was asked to confirmation whether the bus stops within a 400 metre radius of the site were compliant with current accessibility standards. TfL advised that it would seek a contribution of up to £10,000 per stop, for bus stops that were found to not be complaint, in accordance with London Plan Policy 6.7.

45 Since these representations were made the applicant has assessed the condition of nearby bus stops with respect to compliance with TfL guidelines. Following this assessment, TfL confirms that the stops are fully Disability Discrimination Act compliant, and require no further works. On this basis officers are satisfied that the application accords with London Plan Policy 6.7.

Travel plan

46 Following representations made at consultation stage a number of amendments have been made to the travel plan. Whilst these are broadly supported with respect to London Plan Policy 6.3, TfL seeks some further work with respect to targets and measures for staff and shoppers. Therefore, to ensure the document is in accordance with TfL best practice, TfL requests that it be consulted on the revised document, which will be secured by planning condition.

47 Officers note that a construction logistics plan and delivery and servicing plan will be secured by condition. This is supported in accordance with London Plan Policy 6.14.

Highway

48 The application site sits within the main Harrow Road corridor identified in the Harrow and Wealdstone Area Action Plan. TfL and the Council are in the process of preparing a strategic transport model which would cover this area. Following a request by TfL, the applicant has agreed to provide £10,000 towards preparation of the model, this is welcomed in accordance with the principles of London Plan Policy 6.12. If necessary, TfL will draw this money down from the Council to fund the work of consultants. Early iterations of the model have identified some highway capacity issues in the wider intensification area, however, as stated above the level of car parking has been capped to London Plan standards, which would result in only 66 additional parking spaces, and therefore, only a negligible impact on the highway network. The applicant nevertheless accepts that there would be a cumulative effect on the network, and has made contributions accordingly. It should be noted that there is no Transport for London Road Network in Harrow, however, TfL will work closely with the Council where strategic highway issues arise, in particular where this relates to signals and buses.

49 The applicant has also agreed, in consultation with TfL and the Council, to remove the northbound bus gate to allow for an improved flow of traffic through the Hindes Road junction. A £50,000 contribution will be made to the Council who will implement this in consultation with TfL.

50 In summary, the transport issues raised at consultation stage have been satisfactorily resolved and the application now accords with London Plan transport policies. TfL requests that it be involved in the drafting of the final section 106 legal agreement, where this relates to transport, and that it is consulted when discharging conditions relating to the travel plan. Further discussions with the applicant through future monitoring and further work on the strategic highway modelling, may also be necessary.

Response to consultation

51 Harrow Council publicised the application by sending notifications to 1,477 addresses in the vicinity of the site, and issuing site and press notices. The relevant statutory bodies were also consulted.

Public consultation

52 In response to the public consultation the Council received a total of 271 objections, including two petitions and representations from Campaign for Better Harrow Environment, Roxborough Road Residents Association and Buckingham College School. The Council also received 33 representations in support of the scheme, along with 746 postcards of support presented by Tesco, following a consultation the company conducted prior to submitting the application.

53 In summary, the objections raised relate to traffic congestion, car parking, access, increased trips to site, retail impact, visual impact, scale and massing, response to context, impact on local

54 In summary, the representations of support cite the following reasons: improved town centre retail provision, increased footfall, job opportunities and affordable housing.

Responses from statutory bodies and other organisations

55 Environment Agency raised no objection subject to the inclusion of a planning condition to ensure the development is carried out in accordance with the approved flood risk assessment. Officers note that the Council has included such a condition on the draft decision notice.

56 Thames Water was consulted on the application but to date the Council has not received a response. The Council has imposed standard conditions with respect to surface water discharge and drainage, as well as an informative with respect to establishing the likely impact of this development upon the sewerage infrastructure. Thames Water has been invited to provide comments for consideration by the Council before the draft decision notice is finalised.

57 Metropolitan Police raised no objection to the application, but provided a series of detailed security recommendations. The applicant has agreed to implement the recommendations, and Metropolitan Police have concluded that the proposal would meet minimum requirements for Secured by Design certification.

58 English Heritage and London Underground raised no objection to the proposal.

Summary

59 The statutory and non-statutory responses to the Council's consultation do not raise any material planning issues of strategic importance that have not already been considered at consultation stage, and/or in this report.

Legal considerations

60 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice.

Financial considerations

61 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government guidance in Circular 03/2009 (*Costs Awards in Appeals and Other Planning Proceedings*) emphasises that parties usually pay their own expenses arising from an appeal.

62 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

Conclusion

63 The concerns raised at consultation stage with respect to retail, employment, housing, urban design, sustainable development and transport have been resolved, and the application is now in accordance with the London Plan.

Tesco store, Station Road, Harrow town centre

in the London Borough of Harrow

planning application no. P/0832/11

Strategic planning application stage 1 referral (new powers)

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

The proposal

Extension of an existing store to provide additional 651 sq.m. net convenience and 2,368 sq.m. net comparison floorspace, a new four storey mixed-use building to provide Class A1/A2/A3 uses and 14 residential flats, and a decked car park, landscaping and other external alterations.

The applicant

The applicant is **Tesco Stores Ltd.**, and the architect is **Michael Aukett Architects**.

Strategic issues

The principle of the development does not raise strategic concern, however, further work, revisions, and commitments are required with regard to **retail, employment, housing, urban design, sustainable development** and **transport**, to address outstanding concerns.

Recommendation

That Harrow Council be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 88 of this report; but that the possible remedies set out in paragraph 90 of this report could address these deficiencies. The application does not need to be referred back to the Mayor if Harrow Council resolve to refuse permission, but it must be referred back if Harrow Council resolve to grant permission.

Context

1 On 19 July 2011 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 has until 29 August 2011 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. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 3F of the Schedule to the Order 2008: *“Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use.”*

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; or allow the Council to determine it itself, unless otherwise advised. In this instance if Harrow Council resolves to refuse permission it need not refer the application back to the Mayor.

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 existing Tesco store resides on a 2.2 hectare, irregular shaped plot, just within the boundary of Harrow Metropolitan Town Centre. The east the site is bound by Station Road (part of the Strategic Road Network), a small parade of shops and a cinema building. The northern boundary is bound by a strip of landscaping and High Mead - a residential cul-de-sac. To the south and west of the site are the predominately residential streets of Hindes Road and Hamilton Road.

6 The existing store has a gross floorspace of 5,305 sq.m. and is predominately single storey. The supermarket is located within the north-eastern portion of the plot, with expansive surface level car parking occupying the remainder of the site, giving the store the characteristics of an out of town shopping centre.

7 The site provides 386 car parking spaces (including 19 disabled spaces), six cycle spaces, and has a public transport accessibility level of between 3 and 4 (on a scale where 1 is low and 6 is high). The nearest station is Harrow on the Hill, approximately 0.5km south the site, providing access to the Metropolitan Underground line and Chiltern Railway. Harrow and Wealdstone London Overground station is located 0.7km to the north. Bus routes 140, 258, 182, 186 and 340 use Station Road and pass by the site providing links to other strategic centres and the adjacent town centre, including access to Harrow bus station.

Details of the proposal

8 The proposed development contains two main components: works to the Tesco store and car park; and part infill of the Station Road and Hindes Road corner frontage. These components comprise the following key elements:

- An extension to the existing store on the western edge of the site providing 651 sq.m. net convenience floorspace and 2,368 sq.m. net comparison floorspace;
- An increase in the height of the roof level to accommodate mezzanine floorspace;
- Car park reconfiguration (including provision of a single story decked car park) to provide 462 spaces in total (an uplift of 76 spaces over the existing provision);
- Four commercial units (324 sq.m. net total) (Use Class currently undetermined) fronting the Station Road and Hindes Road Junction;
- Fourteen residential flats (above the proposed commercial units) at the Station Road and Hindes Road Junction.

Case history

9 In January 2009 an application for expansion of the existing store (to provide approximately 4,110 sq.m. net retail floorspace) was referred to the Mayor. However, the application was subsequently withdrawn during the Mayor's consultation stage, and no formal representations were made.

Strategic planning issues and relevant policies and guidance

10 The relevant issues and corresponding policies are as follows:

- Retail/town centre uses *London Plan; PPG13, PPS4*
- Employment *London Plan; PPS4*
- Housing *London Plan; PPS3; Housing SPG; Providing for Children and Young People's Play and Informal Recreation SPG, Housing Strategy; Interim Housing SPG; Housing SPG EiP draft*
- Affordable housing *London Plan; PPS3; Housing SPG, Housing Strategy; Interim Housing SPG; Housing SPG EiP draft*
- Density *London Plan; PPS3; Housing SPG; Interim Housing SPG; Housing SPG EiP draft*
- Urban design *London Plan; PPS1*
- Access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Sustainable development *London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; the Mayor's Energy Strategy; Mayor's draft Climate Change Mitigation and Adaptation Strategies; Mayor's draft Water Strategy; Sustainable Design and Construction SPG*
- Transport and parking *London Plan; the Mayor's Transport Strategy; PPG13*

11 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 2004 Harrow Unitary Development Plan saved policies and the London Plan (2011).

12 The following are also relevant material considerations:

- The Harrow Core Strategy (Submission Stage)
- The Harrow and Wealdstone Area Action Plan (Issues and Options Stage)

Principle of development

13 The site is located within Harrow Metropolitan Town Centre, as defined by the 2004 Harrow UDP, and this designation continues to be reflected through the Council's emerging LDF proposals map. The site also lies within the wider Harrow and Wealdstone Intensification Area, as indicated by Map 2.4 in the London Plan, and identified in more detail within the emerging Harrow Core Strategy and Harrow and Wealdstone AAP.

14 London Plan Policy 4.7 states that the Mayor will support a strong, partnership approach to assessing need and bringing forward capacity for retail, commercial, culture and leisure development in town centres, whilst Policy 4.8 seeks to support a successful, competitive and

15 As discussed previously in paragraph five and thirteen, the site is located within the boundary of Harrow Metropolitan Town Centre. It is, however, noted that the application site lies some distance from the designated primary shopping frontage within the town centre. Therefore, when using the definitions within Annex B of PPS6, it is evident that the site should be treated as an edge-of-centre location.

16 London Plan Policy 4.7, part B, sets out strategic principles to be applied when assessing development proposals for retail and commercial uses. In particular, these relate to the appropriate scaling of retail proposals relative to the size, role and function of the town centre, the intention that these uses should be focused in central town centre locations first, and the need for edge or out of centre development to provide an assessment of impact.

Scale of retail development

17 London Plan Policy 4.7, part B(a) states that the scale of retail and commercial development should be related to the size, role and function of a town centre and its catchment. Findings from the Harrow retail study 2009, reflected in Harrow Council’s emerging Core Strategy, provides figures for projected growth in retail floorspace in the borough up to 2020. The vast majority of future capacity is expected to be accommodated within the Harrow and Wealdstone Intensification Area, and within this, the Harrow Metropolitan Town Centre is expected to make provision for approximately 22,500 sq.m. of net comparison floorspace, and 4,000 sq.m. of net convenience floorspace. Capacity for an additional 8,000 sq.m. net floorspace of services and Use Classes A2-A5 is also identified.

18 Set against this context, a detailed break down of the nature of the proposals, in terms of net floorspace against the existing provision at the site, is provided below.

	Existing (sq.m.)	Proposed addition (sq.m.)	Total (sq.m.)
Net convenience	3,075	651	3,708
Net comparison	395	2,368	2,763
Net commercial (Use Class A)	0	324	324
Total net retail	3,452	3,343	6,795

19 The proposed increases in net convenience and net comparison floorspace represent 16% and 11%, respectively, of the relevant projections for growth up to 2020. With regard to the proposed commercial floorspace, assuming it was to fall within Use Classes A2-A5, this would represent 4% of the associated projection for future growth. Therefore, on the basis of the growth projections within the Harrow 2009 retail study, and the emerging Harrow Core Strategy, it would appear that the increase in retail floorspace proposed could be accommodated within growth forecasts for the town centre. The Council should, however, satisfy itself of this as part of its own local assessment.

20 When considering the total provision of net retail floorspace at the store holistically, the retail split (including the proposed extension) would be 57% convenience 43% comparison. This sits against a current split of 89% convenience 11% comparison. It is evident that the proposal would create a marked shift in the nature of retail offer of the site, and officers have some concerns that the proposed 86% increase in comparison floorspace could have significant implications for the way that the store operates as a shopping destination within the town centre. In assessing the local impacts of the proposal the Council should satisfy itself that the retail make

21 As discussed in paragraph eight, and detailed in the table above, the applicant has proposed 324 sq.m. of Use Class A commercial floorspace in four units to front Station Road and the Hindes Road Junction. However, the proposed specifics of the Use Class(es) has not yet been defined as the applicant is seeking flexibility to respond to market requirements. London Plan Policy 4.9 seeks to encourage large retail developments to provide or support affordable shop units suitable for small or independent retailers and service outlets to strengthen and promote the retail offer, attractiveness and competitiveness of town centres. On this basis, and coupled with the urban design benefits discussed in paragraph 47, this approach is supported in principle. The applicant and the Council should, however, ensure that these units would be viable and affordable for potential small business occupiers, and (as discussed in detail in paragraph 47) ensure a vacancy strategy is in place to avoid blank facades or empty units fronting the street while the commercial space is being marketed.

22 In summary, whilst in strategic terms it would appear that the increase in retail floorspace proposed within this metropolitan town centre and area for intensification could be accommodated within projected growth forecasts, in assessing the local impacts of the proposal the Council should satisfy itself that the proposed rate and nature of growth accords with local aspirations for Harrow town centre, and the wider intensification area, in accordance with the principles of London Plan Policy 4.7, part B(a). The Council should also ensure that the proposed A Class units at Station Road and Hindes Road are viable, and affordable, in line with the aspirations of London Plan Policy 4.9.

Town centre first

23 London Plan Policy 4.7, part B(b) states that retail, commercial, culture and leisure development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that are, or can be, well integrated with the existing centre and public transport. As discussed in paragraph fifteen, the application site is located at the edge of Harrow town centre. It is, therefore, necessary for the applicant to demonstrate that no in-centre sites are available for this development, before the proposal could be acceptable in an edge-of-centre location.

24 To this end the applicant has conducted a sequential assessment to analyse the potential for the development to occur (even in disaggregated form) on other, more central, sites. Having considered various other sites in Harrow and Wealdstone town centres, the assessment concludes that none provide an opportunity that would be suitable, available and viable.

25 On this basis it would appear that the Tesco Station Road site is the only suitable location for the development within the area of assessment, however, the Council should satisfy itself that all appropriate local sites have been considered as part of the sequential test, before the selection of this edge-of-centre site can be accepted in accordance with London Plan Policy 4.7, part B(b).

Assessment of impact

26 London Plan Policy 4.7, part B(c) states that proposals for new, or extensions to existing, edge or out of centre development will be subject to an assessment of impact. In response to this the applicant has provided an assessment of the anticipated impact of the development within the submitted planning statement. It is understood that the parameters for assessment have been based on scoping discussions with the Council.

27 With respect to the impact on centre vitality and viability, the applicant has calculated the level of trade diversion that the proposal would draw from Harrow Metropolitan Town Centre. Based on the material provided, the impact assessment indicates that the proposal would result in a diversion of £600,000 convenience expenditure, against a town centre turnover of £22,000,000, and a diversion of £2,730,000 comparison expenditure, against a town centre turnover of £256,060,000.

28 These figures represent a 3% diversion in convenience expenditure, and a 1% diversion in comparison expenditure, from Harrow town centre. Whilst this would not raise any significant concerns at the strategic level, in assessing the local impacts of the proposal the Council should ensure that the level of trade diversion would not be likely to adversely impact on the vitality and viability of Harrow Metropolitan Town Centre, nor indeed that of Wealdstone District Centre, which has a more niche and localised convenience retail offer.

Employment

29 London Plan Policy 4.12 seeks to improve employment opportunities for Londoners and to remove barriers to employment. This policy states that strategic development proposals should support local employment, skills development and training opportunities. The applicant is, therefore, strongly encouraged to provide local employment initiatives as part of these proposals. Employment opportunities should cover both the construction and operation of the development, and associated jobs should be advertised locally. These initiatives should be detailed within an employment and training strategy, and this should be secured by the Council through planning condition.

Housing

30 As discussed in paragraph 8, the proposals include the provision of fourteen residential units, stacked above the proposed commercial units at the Station Road and Hindes Road Junction. Details of the proposed residential mix is provided below.

Unit type	Number of units	People per unit
One-bedroom	5	2
Two-bedroom	4	3
Three-bedroom	5	4

Affordable housing

31 The applicant has stated that all fourteen units are intended to be affordable. This is strongly supported in accordance with London Plan Policy 3.11, which seeks to maximise affordable housing provision. However, no details have been provided with regard to the nature of the affordable housing product(s) proposed.

32 The applicant is advised that in the recent funding programme issued by the Homes and Communities Agency for the period 2011 to 2015, it has been made clear that funding for social rented products will only be supported in limited circumstances. The applicant should therefore have regard to the revised definitions of affordable housing within Planning Policy Statement 3: Housing (June 2011), which formally introduces affordable rent as a new affordable housing product, and submit viable proposals for delivering the proposed affordable provision.

Tenure split

33 London Plan Policy 3.11 seeks to ensure that 60% of the affordable housing delivered throughout the Plan period is social rented housing, and that 40% is intermediate provision. It is, however, acknowledged that the shift in national housing policy, discussed in paragraph 31 above, is not currently reflected in strategic planning policies for London.

34 The applicant has not provided any details on an intended affordable tenure or split. As discussed in paragraph 31, the applicant should develop the housing offer in more detail, and submit viable proposals in response to strategic objectives, and local housing need.

Mix of units

35 London Plan Policy 3.8 encourages a full range of housing choice. This is supported by the London Plan Housing SPG, which seeks to secure family accommodation within residential schemes, particularly within the social rented sector, and sets strategic guidance for councils in assessing their local needs. Policy 3.11 of the London Plan states that within affordable housing provision, priority should be accorded to family housing. Recent guidance is also set out in the London Plan Interim Housing SPG (April 2010). Also relevant is Policy 1.1, part C, of the London Housing Strategy, which sets a target for 42% of social rented homes to have three or more bedrooms.

36 The scheme proposes, 36% family accommodation within the proposed affordable provision, all five units of which are three-bedroom. The proposals also include 29% two-bedroom units, and 36% one-bedroom units.

37 GLA officers acknowledge that this is a comparatively small residential scheme, and on the basis that the proposed provision will be 100% affordable, and that 36% of this provision will be for three-bedroom family units, the proposed mix is acceptable in accordance with London Plan Policy 3.8 and 3.11.

Density

38 London Plan Policy 3.4 seeks to optimise the housing potential of sites, having regard to local context, design principles and public transport accessibility. The site has a public transport accessibility level of three to four, and is classified as urban in character. The London Plan density matrix (Table 3.2) would, therefore, broadly suggest a residential density of between 200 and 450 habitable rooms per hectare. An assessment of residential density has not been provided, however, officer estimates indicate the mixed-use portion of the scheme would have a residential density of approximately 320 habitable rooms per hectare. This would accord with the range within the London Plan density matrix.

39 While there is not an in principle objection to the density proposed, which accords with the London Plan density matrix, to be acceptable the development will need to provide high quality residential accommodation that is well designed and delivers an appropriate mix of units, sufficient play and amenity space in line with London Plan requirements, and be well designed and in context with its surroundings. These considerations are addressed under relevant sections of this report, and the applicant must address any associated concerns raised, in order for the proposal to be acceptable in accordance with the principles of London Plan Policy 3.4.

Residential design standards

40 Policy 3.5 within the London Plan seeks to ensure housing developments are of the highest quality internally, externally, and in relation to their context and to the wider environment. Table

41 The applicant has stated that all units would achieve Lifetime Homes standards, and that dwellings have been designed to meet standards within the London Plan and London Housing Design Guide. The plans submitted support the stated commitment to deliver these standards, and the residential typologies proposed are acceptable in accordance with London Plan Policy 3.5.

Children's play space

42 While officers acknowledge that the applicant intends to provide a degree of amenity space for residents in the form of private balconies, no detail appears to have been provided on how the development would make the necessary provision for children's play space.

43 The applicant should have regard to London Plan Policy 3.6, and the methodology within the Mayor's supplementary planning guidance '*Providing for Children and Young People's Play and Informal Recreation*', to anticipate the expected child population within the development, and provide play facilities to meet this need. Paragraph 4.31 of the SPG states that all developments with an estimated child occupancy of ten or more should seek to make appropriate play provision to meet the needs arising from the development. The applicant should note that estimated child population will vary depending on tenure. Initial officer estimates, using the methodology within in the SPG, indicate that the development would be expected to have a child population of three under a wholly intermediate scenario, or fifteen under a wholly social rented (or affordable rented equivalent) scenario.

44 Once the proposed model and tenure of the affordable housing has been established, the applicant should carry out a child yield assessment, using the methodology within the SPG, to determine whether access to children's play space provision will be required as part of the development. While officers acknowledge that this is a relatively small housing scheme, and likely to be on the threshold of the requirements of the SPG, the applicant should demonstrate how the objectives of London Plan Policy 3.6 will be met, either on site, or through existing provision.

Urban design

45 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 7 which address both general design principles and specific design issues, with new development required to have regard to its context, and reinforce or enhance the character, legibility, and permeability of the neighbourhood (Policy 7.1).

Layout

46 London Plan Policy 7.1, part D, sets out the requirement for developments to reinforce or enhance the permeability and legibility of neighbourhoods, so that communities can easily access community infrastructure, commercial services and public transport. The proposed development is set within its own urban block and does not, therefore, need to provide any additional routes through the site. However, development's response to the frontages at Station Road, Hinds Road and High Mead will have a direct impact on how easy and attractive it is for people to move through the area.

47 The applicant's intention to locate the mixed-use commercial and residential block along the Station Road frontage is strongly supported. This will help to restore the building line along this section of the street, as well as providing passive surveillance and activity to the public realm along Station Road. The proposed inclusion of commercial units at the ground floor re-enforces

48 Whilst the approach to the Station Road frontage is roundly supported, the proposed response to High Mead and Hindes Road is, a little more disappointing. Whilst the building form encloses High Mead relatively well, it turns its back to the development opposite, and would not provide any form of meaningful interaction with the street. With regard to the Hindes Road boundary, the proposal would not provide adequate enclosure, or surveillance to the street, which performs an important function as a key approach to the high street and town centre from the west. The applicant is, therefore, advised to review the approach to these two boundaries, and, in particular, to consider an extension of the proposed Station Road block, to wrap around further along Hindes Road. This would enhance the character and legibility of Hindes Road in accordance with London Plan Policy 7.1, and help to optimise the site's potential in line with London Plan Policy 7.6.

Scale, height and massing

49 London Plan Policy 7.6, part B, sets out the requirement for development to be of a proportion, composition, scale and orientation that enhances, activates and appropriately encloses the public realm. This Policy also states that buildings should provide a contemporary architectural response to a site, whilst having regard to the pattern and grain of development in the wider area.

50 Whilst officers are content that the proposed height of the development does not present any strategic design concerns, it is noted that the large footprint format of the extended store, coupled with the associated car park, would not reflect the finer grain development that characterises its surroundings. The applicant's efforts to mitigate this impact along Station Road, through the introduction of a finer grain street frontage, is successful, and the applicant is strongly encouraged to adopt a similar approach along Hindes Road and High Mead, where possible.

Inclusive access

51 London Plan Policy 7.2 seeks to ensure that proposals aim for the highest standards of accessibility and inclusion (not just the minimum), and that the design process has considered how everyone, including disabled and deaf people, older people, children and young people, will be able to use the places and spaces that are proposed.

52 As discussed in paragraph 41 the applicant has committed to achieving Lifetime Homes standards for 100% of the proposed dwellings. Indicative plans have been provided, demonstrating that hoists and grab rails could be fitted as necessary. This is supported in accordance with London Plan Policy 3.8, and the Council should secure compliance with Lifetime Homes standards through planning condition.

53 London Plan Policy 3.8 also requires that ten per cent of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. The applicant has indicated that one unit would be accessible for wheelchair users, and has provided a dedicated Blue-Badge parking space in conjunction with this provision. This is acceptable.

54 With regard to the proposed store extension, as discussed in detail in paragraph 73, the applicant has proposed 27 Blue Badge parking bays. These would be located in close proximity to

55 In summary, officers are broadly satisfied that the proposal is acceptable in accordance with London Plan Policy 7.2 and 3.8.

Sustainable Development

56 London Plan climate change policies, set out in Chapter 5, collectively require developments to make the fullest contribution to the mitigation of, and adaptation to, climate change, and to minimise carbon dioxide emissions. London Plan Policy 5.2 sets out an energy hierarchy for assessing applications, London Plan Policy 5.3 ensures future developments meet the highest standards of sustainable design and construction, and London Plan policies 5.9-5.15 promote and support the most effective climate change adaptation measures including passive thermal regulation, urban greening, and water management.

Energy efficiency

57 The applicant has proposed a limited number of passive design features and demand reduction measures for the commercial spaces of the proposed development. However, no detail appears to have been provided in relation to the residential units, this is unacceptable.

58 Using 2010 Building Regulations compliance software, the applicant should model, and commit to, additional measures enable the development to exceed 2010 Building Regulations compliance through energy efficiency alone. The modelling and measures proposed must consider both the residential and commercial spaces of the proposed development to be acceptable in accordance with London Plan Policy 5.1.

District heating, and combined heat and power

59 The applicant's energy statement does not discuss the potential for connection to possible future heat networks in the area. While there are currently no district heating networks within the vicinity, there are aspirations for such networks to come forward in future, as part of strategically coordinated proposals for the Harrow and Wealdstone intensification area. On this basis the applicant should demonstrate that connection to future networks would be possible, in accordance with London Plan Policy 5.5.

60 The applicant also should provide clarification regarding the proposed heating infrastructure and heating systems, that are intended to supply the development with heat. Given the type and scale of development, the use of combined heat and power has not been proposed. Whilst this is accepted, the applicant should explore the opportunities that may arise from recovering waste heat from the refrigeration equipment, used in the supermarket stores.

Cooling

61 The applicant's energy statement does not appear to address proposals for cooling in sufficient detail. The applicant should provide information on how the demand for cooling has been reduced in the first instance, where within the development a demand for cooling will exist, and how this requirement would be provided with the lowest carbon impact, so that the proposal may be fully assessed against the principles of London Plan Policy 5.9.

Renewable energy technologies

62 The applicant has not committed to the use of any renewable technology on-site. Officers anticipate that once the modelling requested in paragraph 58 is submitted, it may demonstrate that the proposals would fall short of achieving the 25% carbon dioxide reduction target beyond Part L of 2010 Building Regulations as required by London Plan Policy 5.2. Therefore, the applicant should investigate opportunities for using renewable energy on-site in more detail. Whilst it is acknowledged that limitations may exist regarding the use of certain technologies, the use of photovoltaics, solar thermal and heat pumps should be investigated further in accordance with London Plan Policy 5.7. Officers are not currently satisfied that the arguments presented, purportedly precluding the use of these technologies as part of the scheme, are acceptable.

63 The applicant should provide drawings, showing the roof space available for the installation of solar technologies, before this option can be disregarded. Should the applicant fall short of the 25% carbon dioxide reduction target, opportunities for using the existing Tesco store to help reduce carbon dioxide emissions should be further investigated, e.g. use of roof on the existing store for installing photovoltaics.

Expressing carbon dioxide savings

64 Using 2010 Building Regulations approved modelling software, the applicant should:

- estimate the regulated carbon dioxide emissions of the development after each stage of the energy hierarchy in tonnes of carbon dioxide per year;
- estimate the regulated carbon dioxide emissions of the development after the cumulative effect of energy efficiency measures, CHP (if applicable) and renewable energy has been taken into account.

65 The carbon savings of the proposed scheme should be related to a 2010 Building Regulations compliant development.

Urban greening

66 London Plan Policy 5.10 seeks to promote and support urban greening, such as new planting in the public realm, and green infrastructure, to contribute to the adaptation to, and mitigation of, the effects of climate change and the urban heat island effect. Policy 5.11 requires major development proposals to be designed to include roof, wall and site planting, especially green roofs, where feasible.

67 On the basis of submitted plans, and the sustainability statement, it is evident the applicant is proposing to develop various areas of soft landscaping and tree planting. This is supported. However, on the basis of the material provided, the applicant does not appear to have given adequate consideration to the provision of a green roof. Having regard to the comments made in paragraph 62 and 63 above (regarding provision of roof mounted photovoltaics), the applicant should present complementary proposals for provision of a green roof, in line with the aspirations of London Plan Policy 5.11.

Sustainable urban drainage systems

68 London Plan Policy 5.13 seeks to ensure that development utilises sustainable urban drainage systems (SUDS), unless there are practical reasons for not doing so, and aims to achieve greenfield run-off rates.

69 The applicant has stated that the site does not lie in a flood risk zone, and has calculated that 700 sq.m. attenuation would be required to cater for a one in hundred year plus 30% climate

Transport

70 It is expected that the proposed supermarket expansion would result in an increase in traffic generation by up to 23.7%, an increase of 114 and 141 two way vehicular trips for weekday AM and PM peak respectively, and 217 two way vehicular trips during the Saturday mid-day shopping hour. Existing multi-modal trip rates have been based on customer mode surveys at the existing Tesco site in January 2011, TfL is satisfied that this is acceptable. It is noted that the additional floorspace would primarily be used for non-food retail, and, in particular, bulky goods. However, TfL is content that the trip generation methodology adopted is in accordance with London Plan 6.3.

Highway capacity

71 Both TfL and the Council are assessing general highway capacity, and growth on the Station Road corridor between Harrow on the Hill and Harrow and Wealdstone stations. A transport study is being prepared using TfL's suite of strategic transport models. The initial stages of this work have begun, and a report will be published towards the end of the year. The purpose of the transport study is to provide a multi-modal assessment of the cumulative impact of new developments within the Harrow and Wealdstone intensification area. This will enable the Council to review with more certainty major development proposals coming forward, including those at this site, against background growth assumptions. As a result of this process there may be a change in layout and design of some of the key junctions, including the Station Road/Hindes Road junction, and elsewhere along the Station Road corridor, reflecting the Mayor's objective to smooth traffic flow, in accordance with London Plan policy.

72 Against this context TfL will require a contribution of £10,000 from the developer, to be secured through the section 106 legal agreement, towards developing the strategic highway model. This is necessary due to concerns regarding traffic flow and highway trips directly related to the proposed development. Once this work has been concluded, TfL will be seeking contributions from developers towards future highway works necessary to mitigate the proposed development and any cumulative impacts. This is required in accordance with London Plan Policy 6.12.

Car parking

73 Following the receipt of correspondence subsequent to the submission of the transport assessment, TfL understands that the planning application proposes a total of 462 parking spaces to serve the supermarket. This includes 27 disabled spaces, and 20 parent and child spaces. London Plan Policy 6.13 requires 6% of the total number of spaces to be Blue Badge bays. The proposed provision of 27 Blue Badge bays is acceptable.

74 Given the sensitive nature of the surrounding highway network, TfL would expect to see the minimum provision of parking spaces necessary to support the development, in line with London Plan standards. Applying these standards holistically to the site would result in a minimum of 354 spaces and a maximum of 517 spaces. TfL strongly advises that the number of spaces be reduced to 354 spaces, in accordance with the aspirations of London Plan Policy 6.13.

75 Six car parking spaces are proposed to serve the fourteen residential units. Taking into account the good accessibility to local public transport and amenities, TfL requests that the residential element is car free, except for at least one disabled parking space. To ensure accordance

76 TfL notes that electrical vehicle charging points are proposed in line with London Plan standards. This is supported in line with London Plan Policy 6.13.

Cycling

77 Ninety cycle parking spaces are proposed to serve the supermarket, with an additional fourteen spaces for the residential development. The level of provision for the supermarket is supported. However, the cycle provision for the residential units needs to be increased to reflect the need for two spaces for the 3-bed units. Additional visitor cycle parking is also required to ensure accordance with London Plan Policy 6.9.

78 It is acknowledged that reference is made within the transport assessment to the provision of cycle parking being increased, if demand requires it. This is welcomed by TfL, and plans should be provided to demonstrate safeguarded land to facilitate any expansion in cycle parking provision. Such land could also be used to provide a cycle club.

Walking

79 Legible London is a way-finding initiative to encourage walking, and, through discussions with the Council, TfL will be seeking to secure a strategy towards the implementation of the scheme within the site's vicinity. The applicant is advised that a section 106 contribution will be sought to fund infrastructure at the site.

80 The approach to pedestrian widths, pavements treatments and quality of the public realm is seen as critical in setting a precedent for development within the intensification area. A PERS audit, and further discussion, is therefore required to determine local priorities, and establish appropriate contributions in accordance with London Plan Policy 6.10. As discussed in paragraph 46, the site presents a good opportunity to positively engage with the high street, and to improve the quality and legibility of surrounding pedestrian linkages.

Public transport

81 TfL considers that the proposal would have a negligible impact on public transport, but as discussed in paragraph 71, an assessment of cumulative impacts will be developed through the intensification area transport modelling process. TfL will, therefore, require further consideration of likely cumulative impacts in order to fully assess the proposal against London Plan Policy 6.3.

82 The applicant should provide confirmation as to whether the bus stops within a 400 metre radius of the site are compliant to the current accessibility standards. If they are not, TfL would seek a contribution of up to £10,000 per stop in accordance with London Plan Policy 6.7.

Travel plan

83 A revised travel plan has been submitted which has subsequently passed the basic ATTrBuTE assessment. However, the applicant must commit to funding towards travel plan incentives, which will need to feed into an overarching framework for the intensification area. The relevant authorities are currently considering how this will operate. TfL would welcome use of bonding the developer against the achievement of targets or contributions, based on floorspace and trip rates. Such targets would need to be agreed with the authorities prior to planning permission. The approach to mode share, monitoring and financial commitments, requires further

84 A delivery and servicing plan and construction logistics plan should be produced in support of the proposal. These must be prepared prior to the commencement of development. TfL would expect these plans to be secured by planning condition to ensure accordance London Plan Policy 6.14.

Local planning authority's position

85 The Council is expected to formally consider the application at planning committee in September 2011.

Legal considerations

86 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. 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

87 There are no financial considerations at this stage.

Conclusion

88 London Plan policies on retail, employment, housing, urban design, inclusive access, sustainable development and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Retail:** Whilst the proposal does not present any significant strategic concerns with regard to scale or impact, confirmation must be provided that the impact of the proposal would be acceptable at the local level in line with London Plan Policy 4.7.
- **Employment:** Commitments are sought regarding the provision of local employment initiatives in line with London Plan Policy 4.12.
- **Housing:** Further details and commitments are sought in line with London Plan Policies 3.11, 3.4 and 3.6.
- **Urban design:** Revisions are sought in line London Plan Policies 7.1 and 7.6.
- **Inclusive access:** The proposal is acceptable in accordance with London Plan Policies 7.2 and 3.8.
- **Sustainable development:** Further details and commitments are sought in line with London Plan Policies 5.1, 5.5, 5.9, 5.7, 5.11 and 5.13.
- **Transport:** Further details and commitments are sought in line with London Plan Policies 6.12, 6.13, 6.9, 6.10, 6.3, 6.7 and 6.14.

89 Whilst the application is broadly acceptable in strategic planning terms, on balance, the application does not comply with the London Plan.

90 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Retail:** The Council should satisfy itself that the scale, sequential assessment and impact of the proposal is acceptable at the local level in line with London Plan Policy 4.7.
- **Employment:** An employment and training strategy should be developed and secured by planning condition in line with London Plan Policy 4.12.
- **Housing:** The applicant should confirm the nature of the affordable housing products proposed, and demonstrate an appropriate response to the requirement for children’s play space in line with London Plan Policies 3.11, 3.4 and 3.6.
- **Urban design:** The applicant should respond to comments made regarding the Hindes Road and High Mead street frontages in line London Plan Policies 7.1 and 7.6.
- **Sustainable development:** The applicant should address concerns regarding energy efficiency, district heating, cooling, renewable technologies and green roofs in line with London Plan Policies 5.1, 5.5, 5.9, 5.7, 5.11 and 5.13.
- **Transport:** The applicant should address concerns regarding highway capacity, car parking, cycling, walking, public transport and travel planning in line with London Plan Policies 6.12, 6.13, 6.9, 6.10, 6.3, 6.7 and 6.14.

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