Planning Note: Tintagel Drive, HA7 4SR

This Planning Note assesses the scope of redeveloping the site to provide housing. This desktop appraisal includes a review of the relevant planning history for the site and surrounding area and a commentary on the planning policy framework, before assessing the scope of residential development.

Existing Site and Surroundings	**Site Area** 320 sqm. **Site Description** The site comprises a row of 8 single storey garages and an area of hardstanding located off Tintagel Drive. **Surroundings** The surrounding area is predominantly characterised by residential properties. To the south, east and west of the site are rear gardens of detached and semi-detached properties along Morecambe Gardens and Pangbourne Drive. Further south is the Aylward Primary School, accessed from Westbere Drive and Pangbourne Drive. Along the northern boundary is 12 Tintagel Drive, a two storey semi-detached house with garden and garage. There are two windows on the flank wall which face directly onto the site. Further north is a large open space and which is designated as Open Space. **Transport Accessibility** The site has a Public Transport Accessibility Level (PTAL) of 2 on a scale where 0 is the lowest level of accessibility and 6b is the highest. The closest underground station is Stanmore which is located approximately 600 metres from the site and is served by the Jubilee line. There are also 2 bus stops within 650 metres of the site, the stop at London Road/Reenglass Road being served by route 142 and the stop at Stanmore Station being served by the 324 and H12. **Conservation Areas/Listed Buildings** The site does not fall within a Conservation Area nor does it contain any listed buildings. **Flooding** The site falls within flood zone 1 on the Environment Agency's flood maps and is therefore at a low risk of flooding. **Trees** There are no trees on-site protected by a Tree Preservation Order (TPO).
Planning History Search	A desk-based planning history search of the London Borough of Harrow's (LBH) online statutory records has been undertaken.

	The Site There have been no recent applications for the site's redevelopment. **Surroundings** At 90 Pangbourne Drive, permission was granted for the conversion of the dwelling to two flats, single and two storey side to rear extension, single storey rear extension, parking, landscaping, bin/cycle storage and external alterations (including demolition of outbuilding) on 11th April 2019 (application reference P/0710/19).
Site Specific Designations	The site falls within the following designations on Harrow Council's adopted policies map: • RAF Northolt Safeguarding Zone (Blue) • RAF Northolt Safeguarding Zones: Black Dotted Line (Plan B) • RAF Northolt Safeguarding Zones: Black Line • Critical Drainage Area • Core Strategy Sub Area: Stanmore and Harrow Weald The site also falls in close proximity to the following planning designation: • To the north of the site is Designated Open Space, which includes three Tree Preservation Orders.
The Development Plan and Other Material Planning Considerations	The statutory development plan for the London Borough of Harrow (LBH) comprises: • The London Plan (LP, 2016) • Core Strategy (CS, 2012) • Development Management Policies Local Plan (DMP, 2013) • Harrow and Wealdstone Area Action Plan (AAP, 2013) • Site Allocations Local Plan (2013) Material planning considerations to consider in the determination of a planning application include the National Planning Policy Framework (NPPF, 2019) and the Intend to Publish London Plan (ItP, 2019). Relevant Supplementary Planning Documents (SPDs) include the Harrow Residential Design Guide SPD (RDG SPD, 2010) and the Planning Obligations SPD (2013).
Planning Policy Review	**Principle of Residential** The site has not been designated for any specific use in planning policy terms and constitutes previously developed land. The site is surrounded by housing on all sides and therefore a residential use would be consistent with surrounding land uses. The London Plan (2016) sets a minimum annual target of 593 residential units in Harrow, equating to 5,927 new homes over a 10 year period. The 10 year target in the ItP London Plan (2019) increases this target to 8,020 homes, which translates to an annual average of 802 net completions. In addition, Harrow CS Policy CS1 also sets out the need for the provision of additional housing across Harrow. A residential development at the site would make a contribution towards the housing stock in the Borough.

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The ItP London Plan seeks to utilise previously developed small sites for housing (Policies GG2 and H2). Table 4.2 sets a minimum 10 year target of 3,750 net housing completions on small sites (below 0.25 hectares) for the Borough.

In this context it is considered that the redevelopment of the site for housing is acceptable in principle, subject to overcoming other planning policy considerations.

Height
Surrounding residential properties rise to two storeys in height. In line with policy DMP DM1 and paragraph 4.16 of the RDG SPD, new development will need to reflect the scale, massing and roof form of surrounding buildings.

Quantum/Density
The site has a PTAL of 2 and lies in a suburban area. The London Plan density matrix sets out a density guideline of up to 250 habitable rooms per hectare (hr/ha) and 95 units per hectare (u/ha) for a site with this level of accessibility. This equates to a maximum of 8 habitable rooms and 3 units. However, it is recognised that the density matrix is a guide only and should not be applied mechanistically. The emerging ItP London Plan seeks to remove the density matrix and in its place promotes an approach which makes the most efficient use of land (Policy D6).

The appropriate quantum of development will also be determined by other considerations such as residential amenity (including daylight and sunlight impact and ensuring appropriate separation distances to surrounding properties), the level of car parking (both for the new units and any re-provision parking required as a result of the loss of the garages) and the RPAs of retained trees (further information set out in the sections below).

Going forward, it is advised that an architect develops a capacity study for the site to ascertain the appropriate quantum of development, with consideration of the factors highlighted above.

Unit Mix
The Borough's DMP Policy DM24 supports proposals that secure an appropriate mix of housing on site and which contribute to the creation of inclusive and mixed communities. Harrow's CS Policy SC1J identifies that for development sites with a capacity to provide ten or more units, the Council will seek the maximum reasonable amount of affordable housing.

It is advised that the unit mix is discussed and agreed in principle with Planning Officers from the London Borough of Harrow at the pre-application stage.

Residential Quality
Residential development coming forward at the site should accord with the minimum internal space standards set out in Table 3.3 of the London Plan (2016) and Table 3.1 of the ItP London Plan. Any future development should also accord with the accessibility standards in London Plan policy 3.8 and emerging ItP Policy D5.

Residential Amenity
Policy DM1 states that "*proposals that would be detrimental to the privacy and amenity of neighbouring occupiers, or that would fail to achieve satisfactory privacy and amenity*

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for future occupiers of the development, will be resisted". The Harrow Residential Design Guide SPD also provides design guidance in relation to new homes, including new build developments, and sets out standards in relation to internal and external layouts and design features, including streetscape and amenity considerations.

There are two windows on the flank wall of 12 Tintagel Drive which face directly onto the site. To the north-east of the site is 14 Tintagel Drive which will also likely be impacted. There are the rear gardens of properties to the east, west and south of the site. As well as sunlight and daylight considerations, any forthcoming development will need to ensure that the privacy of this amenity space is not severely impacted.

The relationship with neighbouring properties in terms of overlooking, privacy and daylight and sunlight should be considered, having regard to the guidance in Harrow's SPD.

Parking

The site currently provides 8 garages. JLL strongly recommend that a parking beat survey (including garage usage survey) is commissioned to determine how many of the existing garages are occupied (including how many are used for car parking and how many for storage) and to understand on-site and surrounding parking stress and whether there is any existing capacity. This will determine whether any car parking need to be re-provided as a result of the loss of the existing garages, which may affect the overall developable area.

DMP Policy DM42 states that the Council will expect development to comply with the London Plan maximum parking standards, which are: less than 1 parking space per 1-2 bedroom unit, up to 1.5 spaces per 3 bedroom unit and up to 2 spaces per 4 bedroom+ unit. The London Plan states that for outer London areas with a low PTAL boroughs should consider higher levels of provision to address overspill parking.

Turning to emerging policy, Table 10.3 of the ItP London Plan provides lower maximum standards and seeks up to a maximum of 1 space per dwelling for areas in Outer London with a PTAL of 2.

The site falls within the Stanmore (Station Area) Controlled Parking Zone (CPZ) H. This CPZ restriction is prevalent in many of the surrounding streets, however, a section of Tintagel Drive (eastwards) is not subject to the CPZ restriction.

Amenity Space

Policy DM27 states that the appropriate amount of amenity space should be informed by the Mayor's Housing Design Guide. Standard 26 of the Mayor of London's Housing SPG (2016) requires a minimum of 5 sqm of private outdoor space for a 1-2 person dwelling with an additional 1 sqm for each additional occupant. In addition, paragraph 4.65 of the Council's RDG SPD states "*where balconies are accepted as the only form of amenity space to be within a development, then they should be at least 1.5 metres in depth and of sufficient size to be used as a sitting out area".*

Trees

There are a number of trees in the neighbouring garden of 88 Pangbourne Drive to the south of the site. It is recommended that a tree survey is provided in order to assess

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	whether there would be any significant impact on these trees and their root protection areas (RPAs) as a result of the proposed development.
Community Infrastructure Levy (CIL)/Planning Obligations	**Mayoral Community Infrastructure Levy (MCIL)** Any additional floorspace will be subject to the Mayoral Community Infrastructure Levy (MCIL). This came into effect on 1st April 2019. MCIL is chargeable at £60 per sqm of net additional floorspace in Harrow (+ index linking). **Harrow CIL** The Harrow charging schedule applies CIL for residential (Use Class C3) at £110 per sqm (+ index linking). Social housing relief can be sought for both Mayoral and Harrow's levies. It is also possible to deduct any existing floorspace from the calculation if it has been in use for 6 out of the last 36 months. **Section 106 Contributions** Whilst Harrow's CIL is the primary means by which developments contribute towards infrastructure provision, the Section 106 planning obligations system in Harrow continues to be used to secure on-site affordable housing and justified site-specific mitigation requirements. The Council have a Planning Obligations SPD (2013) which helps to clarify the site specific or local circumstances when planning obligations will be used.
Summary and Conclusions	To summarise, there is considered to be strong planning justification to provide housing on this site, subject to overcoming other planning policy considerations. In the first instance, we recommend that a parking beat survey (including garage usage survey) is undertaken to determine the level of car parking that needs to be re-provided as part of the development due to the loss of the garages. We also recommend that a tree survey is conducted to ascertain the quality of existing trees, determine which need to be retained/removed and the impact of development on surrounding trees and their RPAs. The overall developable area/quantum of development should be tested through an initial capacity study, which also considers the relationship with neighbouring properties in terms of overlooking, privacy and daylight and sunlight. Going forward it is strongly recommended that formal pre-application discussions take place with the London Borough of Harrow.

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