

# Supporting Planning Statement

In Respect of

Proposals for the Redevelopment of Land at  
Copse Farm, Harrow

On behalf of

ZEDHomes Ltd

September 2006

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## 1. INTRODUCTION

1.1 This planning statement is in support of the planning application for the redevelopment of land at Copse Farm, Brookshill Drive, Harrow. It should be read alongside other supporting documents as follows:

- Supporting Planning Statement by Planning Potential (September 2006);
- Design and Access Statement by Kenneth W Reed Associates (August 2006);
- Ecological Survey by Applied Ecology Ltd (November 2005);
- Viability Report by Simmonds and Sons (August 2006);
- Report on ZEDHomes commitment to environmentally sustainable solutions for Copse Farm by ZEDHomes Ltd (September 2006)

1.2 This current application follows the withdrawal of a previous planning application (ref: P/3101/05/CCA/ADK) for a similar scheme which sought alterations and change of use of barn to workspace, extensions to farm building for two houses and the construction of 12 dwellings. The application was recommended for refusal but was withdrawn prior to its consideration at planning committee, following consideration of the planning case officer's recommendations for refusal. The purpose of withdrawing the application at that stage was to reconsider the scheme with particular regard to the proposed reasons for refusal, with the aim of overcoming the concerns raised.

1.3 The purpose of this report is to examine the principal planning issues associated with the proposed residential development of Copse Farm, Harrow. The proposals are for the refurbishment of the barn and conversion to office use and associated workshop / studio, the erection of 12 new dwellings and extension of existing farm building to form 2 additional dwellings. Alongside the planning application, we have

included a Conservation Area application which seeks the demolition of farm buildings and outhouses.

1.4 The application is submitted following discussions with Planning and Conservation Officers of the London Borough of Harrow and consultation with local residents. Comments received during these meetings, including those made by local residents, have been taken into consideration in the preparation of this application.

1.5 This statement describes the site and surrounding area, outlines the relevant planning history, details its relevant planning policy context and assesses the scheme's compliance with policy and, in particular, its impact on the Green Belt and the Conservation Area, provides details of relevant planning decisions in the Green Belt in Harrow and other parts of the country, provides a detailed response to the officer's proposed reasons for refusal of the previous planning application for a similar scheme and concludes by assessing the planning merits of the scheme. Our report concludes that the proposed development is consistent with national and local planning policy guidance for the following reasons:

- The proposals constituting this application are appropriate development within the Green Belt;
- Very special circumstances also exist to provide additional justification for this form of development in the Green Belt;
- The development, by virtue of design and overall reduction in build footprint, will have a reduced impact on the openness of the Green Belt;
- The visual quality of the site will be enhanced;
- The scheme will preserve and enhance the character and appearance of the Brookshill Drive and Grimsdyke Estate Conservation Area.

- A previously developed site will be recycled for residential use and contribute towards the Borough's housing requirements;
- A development scheme of high design quality will be created which will enhance the amenity and character of the surrounding environment;
- The functions of the Green Belt in this area will not be compromised;
- The proposals include the restoration and improvement of locally listed buildings;
- The proposal would result in a highly sustainable and environmentally responsible development in accordance with National Planning Policy.
- The scheme will re-use previously developed land and buildings for relatively low-density residential development which respects the character of the surrounding area and safeguards the countryside from encroachment.
- The proposals will remove unsightly buildings which have little or no architectural significance and provide dwellings of high quality design.
- Locally listed buildings on the site will be retained and restored, therefore preserving and enhancing the character of the Brookshill and Grimsdyke Estate Conservation Area and the Harrow Weald Ridge Area of Special Character.
- The openness of the Green Belt will be preserved and enhanced as a result of these proposals, which will improve the visual quality by reducing the existing footprint, introducing additional planting and retaining all existing mature trees and vegetation;
- The introduction of sustainable development practices which reduce environmental emissions and conserve energy consumption and natural resources.

## **2. SITE & SURROUNDINGS**

- 2.1. The site is located to the north west of Harrow, situated to the south of Old Redding and to the west of Brookshill Drive. The site lies within the Metropolitan Green Belt, the Grimsdyke Estate and the Brookshill Drive Conservation Area and the Harrow Weald Ridge Area of Special Character.
- 2.2. The site forms land previously operated as part of Copse Farm and measures approximately 1.10 hectares in area. The last use of the site was as a livery yard and 'Suzanne's Riding School', however, high running costs and poor viability forced the operator to close the business and dispose of the site.
- 2.3. Copse Farm accommodates various structures and covered areas comprising numerous redundant farm buildings, horse stables, ménages, and occupied residential dwelling houses at 'Dairy Cottage', 'Farm Cottage' and 'Copse Farm House'. These dwellings do not form part of the site for the purposes of this application. Part of the former livery operation within the main stable buildings, opposite Dairy Cottage, was used as office accommodation. The vast majority of the existing buildings are in a poor state of repair.
- 2.4. The site is currently occupied by numerous buildings and areas of hard standing. The arrangement of buildings on the site can be divided into two areas, the eastern and western courtyards.
- 2.5. The eastern courtyard comprises a U-shape pattern of development including 'Dairy Cottage' and 'Farm Cottage' (two-storey dwelling houses, both of which are locally listed) to the north-west corner, single-storey former stables to the south and a larger two storey stable block to the west. To the south of the courtyard, there is a large

- former hay store building forming an archway between the stable blocks and providing access to a large ménage. Beyond this, south of the application site, there is a further, separate, ménage.
- 2.6. The western courtyard consists of a cluster of buildings to the north-west comprising a two-storey barn to the north western frontage, which is Locally Listed, this is attached to another two-storey barn forming an 'L' shaped building. Copse Farm House, a locally listed, two-storey dwelling house, is located to the west of these buildings, outside of the application site. To the South of Copse Farm House, lies a series of connected single storey stable blocks, which have been locally listed. To the south eastern corner of the courtyard is a more modern, large two-storey agricultural building with a large ménage extending along the southern boundary.
  - 2.7. The application site is, overall, a mix of older, original buildings, a considerable amount of newer and ad-hoc structures, with no design relationship to the older properties, plus more modern, purpose built and functional agricultural structures in the form of a large barn and substantial areas of hardstanding, previously used as ménages. The appearance of the site is one of a significant amount of established buildings with limited architectural integrity overall.
  - 2.8. The site has substantial belts of mature trees and hedging along many of its boundaries. In particular, to the south and east of the eastern courtyard.
  - 2.9. The site slopes significantly from the north east to the south west.
  - 2.10. The overall footprint of existing buildings is some 2,333 sq m. The vast majority of buildings are in poor repair and would be costly to refurbish.

- 2.11. Part of the site is surrounded by open fields to the south and west. Three dwelling houses are located immediately to the north, opposite the site boundary. These comprise No's 1 & 2 Brookshill Cottage, semi-detached two storey dwellings, 'White Cottage', a large two storey house made of two former semi detached houses and, 'Bridle Cottage', a single storey dwelling. All dwellings are set back from their frontages and set within substantial plots. A tall mature hedge along the boundary frontage provides excellent privacy to these properties. To the east, along Brookshill Drive, lies 'Dukes Cottage', a two-storey detached dwelling. Similarly, this property benefits from substantial screening by way of mature hedging.
- 2.12. Located adjacent to the eastern boundary of the application site, south of Brookshill Drive, lies 'Red Corners', a two-storey detached dwelling. It is set well back from its western boundary with Copse Farm and has a long rear garden which is well screened by mature hedging affording privacy to the occupiers. There are numerous detached dwelling houses and a development of apartments further along Brookshill Drive. These buildings are a mix of building styles.
- 2.13. Pedestrian and vehicle access to the application site is currently obtained via two access roads.
- 2.14. There are many local services in the surrounding area including shopping, health and leisure facilities, particularly at Wealdstone High Street to the south of the site. Local education facilities are provided at Weald Middle School, Woodlands First and Middle school, Bentley Wood High School and Harrow Sixth Form College, all located within 2km from the site. There is also a range of accessible employment to the south within Harrow and the Greater London area. There is a bus route (Arriva Service 258) close to the site located at the junction of

Brookshill Road and Old Redding. This runs from Watford Junction to South Harrow Station (via Wealdstone High Street) offering a regular 7 day service (approximately every 15mins) from 06:50 (08:09 Sunday) to 00:05.

- 2.15. A public footpath and bridleway runs north south through the site via the existing road providing access to Old Redding to the north west. The fields associated with the farm can be viewed from Old Redding. The application site, however, is not obvious from this view point as it is screened by planting.
- 2.16. Views into the site from Brookshill Drive are limited due to significant built development along the frontage of this road plus mature hedges and trees. Similarly, views into the site from the small road leading to Old Redding are also very restricted due to significant natural screening and the physical barrier of Copse Farm House and the locally listed barn.
- 2.17. It is understood that there are no Tree Preservation Orders affecting the site.
- 2.18. The locally listed buildings covering the application site are: Copse Farm House, Copse Farm Barn and attached stable range, Dairy Cottage, Farm Cottage and the Riding Stables.

### **3. RELEVANT PLANNING HISTORY**

- 3.1. Planning history records indicate that the site has been in use as a riding school since the mid to late 1960's. Various approved applications up to 1979 were made in relation to this use including a storage building, a single storey extension and a covered arena.
  
- 3.2. The most recent applications P/3090/05/CFU/ADK for alterations and change of use of barn to work space, extensions to farm building for 2 houses and the construction of 12 dwellings and application reference P/3101/05/CCA/ADK which sought Conservation Area Consent for the demolition of farm buildings and outhouses were both withdrawn by the applicant on June 1<sup>st</sup> 2006.

#### **4. DESCRIPTION OF THE APPLICATION SCHEME AND BACKGROUND TO THE REVISED PROPOSALS**

- 4.1. Throughout the planning process, discussions and meetings have been held with officers at the London Borough of Harrow as well as local residents. The first public consultation meeting took place on 14<sup>th</sup> July 2004, attended by 16 residents and representatives of organisations in Harrow. The purpose of this meeting was to explain the new owner's interest in the application site, as well as proposals for the future of the site whilst raising awareness of concerns that residents may have over the future of the site. Full details of the public consultation are outlined in the Design and Access Statement, submitted with this planning application.
- 4.2. A second public meeting was held on 6<sup>th</sup> October 2004, attended by 16 people, 6 of who were representatives of various organisations around Harrow, the other 10 were residents of Brookshill Drive. The purpose of this meeting was to discuss preliminary designs.

##### **Proposals**

- 4.3. The proposals forming this planning application seek the refurbishment of the barn and conversion to office use (Class B1) and associated workshop / studio, the erection of 12 new dwellings and extension of existing farm building to form 2 additional dwellings. The Conservation Area application seeks demolition of farm buildings and outhouses. This current application seeks to address concerns raised by officers at Harrow Council in relation to the previous application, particularly with regard to issues relating to the Conservation Area, the Green Belt and the locally listed buildings on the site.

#### Eastern Courtyard

- 4.4. The proposals within the Eastern Courtyard involve the retention of Dairy Cottage, Farm Cottage and stables between Farm Cottage and the open arch hayloft, the conversion of the existing office building to residential use (houses 6 and 7) and the demolition of all remaining buildings and their replacement with houses 8,9 & 10, comprising 1 two bed house, 3 three bed houses and one four bedroom houses.
- 4.5. The existing ménage will be removed and the area will be resurfaced with topsoil and grass seeds planted to improve the connection between Copse Farm and the adjacent open grassland.
- 4.6. The Open Arch Hayloft, which lies at the edge of the eastern courtyard, will be refurbished and converted to workspace use.

#### Western Courtyard

- 4.7. The demolition of stables to the south of Copse Farm House will provide for houses 1 and 2, both four bedroom houses. The existing stable block to the south of the western courtyard will be converted to houses 4 and 5, both 3 bed houses. The scheme minimises disruption to the external brickwork and openings of the existing structures and preserves the volume and height of the building under a new roof to the same profile of the existing stables.

#### Central Courtyard

- 4.8. Within the central courtyard, houses 3, 11, 12, 13 and 14 sit on the footprint of the agricultural shed, formerly used as the indoor arena. They are set at the low level of the shed and are hidden under a sedum grass roof. Houses 3, 11, 12, 13 and 14 are all to be 4 bedrooms. These houses have been designed to be fully sustainable with almost zero carbon emissions. Further details of the sustainability

of the proposals are outlined in the ZEDHomes commitment to Environmentally Sustainable Solutions to Copse Farm.

- 4.9. The total footprint of the proposed development is some 1981 sq m, which represents a decrease in the existing footprint of 352 sq m. There will be a reduction in hardstanding on the site as a result of the proposals of some 2268 sq m. Appendix 2 provides a full breakdown of the floorspace and volume of the application proposals.

#### Access

- 4.10. The proposed access points onto the site will remain as existing, with the main access road being Brookshill Drive. Existing surfaces within the eastern and western courtyards and the adjacent bridle path will be retained and brought to a good state of repair with matching materials.

#### Landscaping

- 4.11. The proposed landscaping is sensitive to the character of Copse Farm and its surrounding area. Where possible, there has been a presumption in favour of retaining existing buildings and structures of merit to retain the character and appearance of the area.
- 4.12. The landscaping of the existing ménages aims to improve the openness of the farm by removing the hard surfaces and fences, regrading the areas to their natural levels. Grass seeds will then be planted which will allow for the extension of the adjacent grassland area.
- 4.13. Further details of the landscaping proposals are outlined in the Design and Access Statement.

#### Design

- 4.14. The overall design of the scheme has been such that the character of the Conservation Area has been retained and, where possible, improved upon. Those buildings that make a positive contribution to the Conservation Area have been retained and refurbished. Elsewhere, derelict buildings of poor quality have been replaced with new, high quality buildings which respect the existing buildings and their surroundings and the integrity of the built form. Each dwelling will have design features common with each other and be compatible with the dwellings and retained buildings forming Copse Farm. Further details on the design of the application proposals are outlined in the Design and Access Statement submitted with the planning application.
- 4.15. In addition to the high quality design features, all new and refurbished buildings will be fully environmentally friendly; further details of the sustainable credentials are outlined in the report on ZEDHomes commitment to environmentally sustainable solutions for Copse Farm by ZEDHomes Ltd submitted with this planning application.

## **5. PLANNING POLICY CONTEXT**

- 5.1. To accord with Section 38 of the Planning and Compulsory Act 2004, an application for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 5.2. For this application, the development plan comprises the London Plan 2004 and the London Borough of Harrow Unitary Development Plan (July 2004). Harrow are now progressing their LDF and have produced a Local Development Scheme (June 2006). The Council aim to have an issues and options version of the Core Strategy available in September 2006.
- 5.3. Other material considerations comprise Government planning guidance such as PPG's and PPS's.
- 5.4. The relevant national, regional and local planning policies are described in the following paragraphs.

### **National Planning Policy Guidance**

#### Planning Policy Statement 1: 'Delivering Sustainable Development'

- 5.5. According to Paragraph 3 of PPS1, sustainable development is the core principle underpinning planning. At the heart of sustainable development is the simple idea of ensuring a better quality of life for everyone, now and for future generations.
- 5.6. Paragraph 22 encourages the more efficient use of existing resources, rather than making new demands on the environment and the promotion of renewable resources, for example, by the development of renewable energy. It further states that Regional and Local Planning

Authorities should promote resource and energy efficient buildings, community heating schemes, the use of combined heat and power, small scale renewable and low carbon energy schemes in developments; the sustainable use of water resources and the use of sustainable drainage systems in the management of run-off.

5.7. Paragraph 5 states that the planning system also has an important role to regulate the development and use of land in the public interest and that a sustainable planning framework should *“use already developed areas in the most efficient way, by making them more attractive places in which to live”*. Four objectives of a sustainable planning framework are stipulated. Of these, any development of the site would have to address the following objectives:

- To use already developed areas in the most efficient way, while making them more attractive places in which to live and work.
- Conserve both the cultural heritage and natural resources taking particular care to safeguard designations of national and international importance e.g. Green Belts.
- Shape new development patterns in a way which minimises the need to travel.

5.8. Paragraph 15 states that *“good design should be the aim of all those involved in the development process and should be encouraged everywhere.”*

Planning Policy Guidance Note 2: ‘Green Belts’

5.9. Paragraph 1.4 states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. It confirms that the most important attribute of Green Belts is their openness.

5.10. Green Belt is a long established feature of the town planning system. PPG2 (Green Belts) was amended in 1995 to give more emphasis to enhancing the environmental quality of the Green Belt. It indicates five purposes for including land in the Green Belt and six objectives that the use of land has a positive role to play in fulfilling. These are set out below.

5.11. The five purpose of including land in Green Belts are:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighboring towns from merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

5.12. The use of land in Green Belts has a positive role to play in fulfilling the following objectives:

- To provide opportunities for access to the open countryside for the urban population;
- To provide opportunities for outdoor sport and outdoor recreation near urban areas;
- To retain attractive landscapes, and enhance landscapes, near to where people live;
- To improve damaged and derelict land around towns;
- To secure nature conservation interest; and
- To retain land in agricultural, forestry and related uses

5.13. PPG2 advises that development control in Green Belts hinges on a two-part test.

- i. Whether the development proposed is "appropriate".

- ii. If inappropriate, whether there are very special circumstances present which clearly outweigh the harm caused by virtue of inappropriateness, and any other harm.

5.14. "Appropriate" development includes extensions, alterations or replacement of existing dwellings and the re-use of buildings. PPG2 states that "inappropriate" development, by definition, is harmful to the Green Belt.

5.15. PPG 2 confirms that the extension or alteration of dwellings is not inappropriate in the Green Belt provided that it does not result in disproportionate additions over and above the size of the original building. Further, the replacement of existing dwellings need not be inappropriate, providing new dwellings are not materially larger than those being replaced (Paragraph 3.6).

5.16. The guidance also accepts that existing buildings can be re-used within the Green Belt without prejudicing its openness, since the buildings are already there. It states that the alternative to re-use may be a building that is left vacant and prone to vandalism and dereliction (Paragraph 3.7).

5.17. According to PPG2, the re-use of buildings inside a Green Belt is not inappropriate development, providing the proposed development meets certain criteria (Paragraph 3.8), including:

- a. It does not have a materially greater impact than the present use on the openness of the Green Belt and the purposes of including land in it;
- b. Strict control is exercised over the extension of re-used buildings, and over any associated uses of land surrounding the building

which might conflict with the openness of the Green Belt and the purposes of including land in it; and

- c. The form, bulk and general design of the buildings are in keeping with their surroundings. Conversion proposals may be more acceptable if they respect local building styles and materials, though the use of equivalent natural materials that are not local should not be ruled out.
- 5.18. Paragraph 3.9 states that, where the above criteria are not met, Local Planning Authorities should consider whether any objections could be overcome by the imposition of reasonable conditions. Further, it confirms that there is no need for the applicant to provide evidence that the buildings are no longer needed for their original purposes.
- 5.19. Paragraph 3.15 states that the visual amenities of the Green Belt should not be injured by proposals for development within, or conspicuous from, the Green Belt.

#### PPG15: Planning and the Historic Environment

- 5.20. Chapter 2 deals with how the development plan should look to preserving and enhancing the historic environment. Paragraph 2.8 deals with the upkeep of historic buildings stating that plans should seek to identify the opportunities which the historic fabric of an area can offer as a focus for regeneration. Excessively detailed or inflexible policies concerning individual buildings or groups of buildings should be avoided.
- 5.21. Paragraphs 2.18 and 2.19 deal with change of use of listed buildings and other buildings within Conservation Areas. It highlights that new uses may often be the key to a building's preservation and controls over land use, density, plot ratio, daylighting and other planning

matters should be exercised sympathetically where this would enable a historic building or area to be given a new lease of life.

- 5.22. Section 71 of the Act places a duty on local planning authorities to formulate and publish proposals for the preservation and enhancement of conservation areas. It is important that designation is not seen as an end in itself: policies will almost always need to be developed which clearly identify what it is about the character or appearance of the area which should be preserved or enhanced, and set out the means by which that objective is to be pursued. Clear assessment and definition of an area's special interest and the action needed to protect it will help to generate awareness and encourage local property owners to take the right sort of action for themselves.
- 5.23. As to the precise interpretation of 'preserve or enhance', the Courts have held (*South Lakeland DC v Secretary of State for the Environment*, [1992] 2 WLR 204) that there is no requirement in the legislation that conservation areas should be protected from all development which does not enhance or positively preserve. Whilst the character and appearance of conservation areas should always be given full weight in planning decisions, the objective of preservation can be achieved either by development which makes a positive contribution to an area's character or appearance, or by development which leaves character and appearance unharmed.

Planning Policy Statement 22: 'Renewable Energy'

- 5.24. The Government is committed to reducing carbon emissions by 60%. The increased development of renewable energy resources is vital to facilitating the delivery of the Government's commitments on both climate change and renewable energy. Positive planning which facilitates renewable energy developments can contribute to the Government's sustainable development strategy including:

- Social progress, by contributing to the nation's energy needs, ensuring all homes are adequately and affordably heated;
- Effective protection of the environment, by reductions in emissions of greenhouse gases and thereby reducing the potential for the environment to be affected by climate change; and
- Prudent use of natural resources, by reducing the nation's reliance on ever diminishing supplies of fossil fuels;

5.25. A Key Principle of the PPS confirms that the wider environmental and economic benefits of all proposals for renewable energy projects, whatever their scale, are material considerations that should be given significant weight in determining whether proposals should be granted planning permission.

5.26. Of further relevance to this application is paragraph 18 which encourages local planning authorities and developers to consider the opportunities for incorporating renewable energy projects in all new developments. *"Small scale renewable energy schemes utilising technologies such as solar panels, Biomass heating, small scale wind turbines, photovoltaic cells and combined heat and power schemes can be incorporated both into new developments and some existing buildings. Local planning authorities should specifically encourage such schemes through positively expressed policies in local development documents"*.

Planning Policy Guidance Note 3: 'Housing'

5.27. This document highlights the Government's commitment to promoting more sustainable patterns of development, by making more efficient use of land through maximising the re-use of previously developed

land. Paragraph 6.5 recognises that not all development can take place within urban areas, although any development that does take place outside urban areas should utilise the most sustainable option. Paragraph 21 explains that the government is also committed to promoting more sustainable patterns of development that reduce the loss of Greenfield land. This is to be achieved by making more efficient use land by maximising the reuse for housing of previously developed land, like at Copse Farm.

- 5.28. PPG3 seeks not only to ensure the efficient use of previously developed land for housing but also to improve the attractiveness of residential areas and the countryside. This principle is particularly relevant to the application site, which is occupied by various unsightly and derelict buildings which harm the amenity of the surrounding area.

Planning Policy Guidance Note 4: 'Industrial, Commercial Development and Small Firms'

- 5.29. PPG4 states that the characteristics of industry and commerce are evolving continuously, and many businesses can be carried on in rural and residential areas without causing unacceptable disturbance through increased traffic, noise, pollution or other adverse effects. It further confirms that individual planning decisions will depend on such factors as the scale of the development, the nature of the use of the site and its location (Paragraph 1.4).
- 5.30. Within areas which are primarily residential, development plan policies should not seek unreasonably to restrict commercial and industrial activities of an appropriate scale - particularly in existing buildings - which would not adversely affect residential amenity (Paragraph 1.5).

### **London Plan, February 2004**

5.31. The London Plan provides a spatial development strategy for Greater London, setting out an integrated social, economic and environmental framework for its future development, looking forward 15–20 years.

#### *Re-use of Existing Land*

- 5.32. Policies within the London Plan are based upon six key objectives; performance indicators are provided in chapter 6 which will be used to monitor the key elements of each of the six objectives.
- 5.33. Objective 1 is of relevance and aims to accommodate London's growth within its boundaries without encroaching on open spaces.
- 5.34. The first performance measure for this objective relates to increasing the proportion of development taking place on previously developed land. Outlining an expectation of a minimum 5% improvement over each five-year period. Another of the performance measures is the protection of open space. The London Plan states that there should be no net loss of open space designated for protection in UDP's due to new development.
- 5.35. All policies in the London Plan promote sustainable development. Policy 2A.1 lists the sustainable criteria which the Mayor will use when considering UDP's and planning applications which are referred to him. The first criterion used is that development should optimise the use of previously developed land and vacant or under used buildings.
- 5.36. Policy 4B.11 of the Plan deals with historic conservation-led regeneration and states that the mayor will, and boroughs should, support schemes which make use of historic assets and stimulate environmental, economic and community regeneration. Particularly

where they bring redundant or under-used buildings and spaces into appropriate use.

#### *Green Belt*

5.37. The London Plan, within Policy 3D.8, contains specific reference on the protection of London's Green Belt in accordance with government guidance in PPG2. It states that there is a general presumption against inappropriate development in the Green Belt, and such development should not be approved except in very special circumstances.

#### **Sustainable Design and Construction**

5.38. The above document has been produced as Supplementary Planning Guidance (SPG) to support the implementation of the Mayor's London Plan. The SPG can be taken into account as a material consideration, so has weight as a formal supplement to the London Plan.

5.39. Policy 4B.6 confirms that the Mayor will, and boroughs should, ensure future developments meet the highest standards of sustainable design and construction and reflect this principle in UDP policies. These will include measures to, *inter alia*;

- Re-use land and buildings;
- Conserve energy, materials, water and other resources;
- Ensure designs make the most of natural systems both within, in and around the building;
- Reduce the impacts of noise, pollution, flooding and micro-climatic effects;
- Ensure developments are comfortable and secure for users;
- Conserve and enhance the natural environment, particularly in relation to biodiversity;
- Promote sustainable waste behaviour in new and existing developments, including support for local integrated recycling

schemes, Combined Heat and Power schemes and other treatment options.

- 5.40. The policy states that Boroughs should ensure that, where appropriate, the above sustainability principles are used to address planning applications.
- 5.41. Paragraph 2.1.3 also seeks to maximise the re-use of existing buildings which can be refurbished or extended without the need for substantial use of new materials from primary resources.
- 5.42. Paragraph 2.1.2 states that 100% of development should be on previously developed land, unless very special circumstances can be demonstrated. It defines very special circumstances as being where the previously developed land has been identified as a Site of Importance for Nature Conservation by the procedures set out in Appendix 1 of the Mayor's Biodiversity Strategy.

#### **London Borough of Harrow Adopted UDP, July 2004**

- 5.43. In the adopted UDP the application site falls within the Metropolitan Green Belt, the Brookshill Drive and Grimmsdyke Estate Conservation Area and the Harrow Weald Ridge Area of Special Character. The above designations and other relevant general policies are discussed in the following paragraphs.

#### *Re-use of previously developed land and buildings*

- 5.44. The Council, in Policy EP20, seeks to encourage all new development to locate on previously developed land (brownfield sites) in order to reduce development pressure on greenfield land. The Council also seek, in Policy EP21, to encourage the re-use of vacant and disused buildings and land. Supporting text (Paragraph 3.72), states that it is

important this is done as quickly as possible. In particular, appropriate levels of new housing provision need to be secured.

*Green Belt*

- 5.45. Policy EP32 'Acceptable Land Uses within the Green Belt' of the UDP reiterates policy 3D.8 of the London Plan and guidance within PPG2. It states that land within the Green Belt as shown on the proposals map will be kept primarily open in character and free from development. However, the construction of new buildings for specified uses is acceptable in principle including, limited extension, alteration or replacement of existing dwellings (subject to Policy EP34). Supporting text states, "*The Council does not regard the extension or alteration of dwellings, as well as the replacement of existing dwellings, as inappropriate, providing this does not result in disproportionate additions over and above the size of the original building.*"
- 5.46. Policy EP33 provides criteria against which development in the Green Belt will be assessed, including whether:
- a. The proposal is appropriate to its Green Belt location;
  - b. The proposal is well designed in relation to the size and shape of the site and in particular, whether sufficient space exists within the site and its surroundings;
  - c. The proposal retains the openness and character of the Green Belt;
  - d. Existing trees and natural features are retained, and a high standard of landscaping could be achieved;
  - e. Any proposed structure would conflict with the purposes and the proper functioning of the Green Belt;
  - f. Any aspect of the proposal would have an adverse visual impact on the skyline and adjacent areas;
  - g. And in the case of replacement dwellings there would be any material increase in site coverage, bulk and height of buildings.

- 5.47. Policy EP34 refers to the extension of buildings within the Green Belt. Such development is expected to be appropriate in terms of bulk, height and site coverage in relation to total site area and to minimise adverse environmental impact on the Green Belt character and; not result in disproportionate additions over and above the size of the original dwelling; and contribute to the reduction of any existing environmental problems on the site.
- 5.48. Policy EP37 relates specifically to the re-use of existing buildings in the Green Belt. The Council will consider applications for such uses in relation to, *inter alia*, whether the proposed use has a materially greater impact than the present use on the openness of the Green Belt and the purposes of including land in it; and whether the buildings are of permanent and substantial construction and are capable of conversion without major or complete reconstruction. The policy also states that criteria under Policy EP34 will be used to assess such proposals.

#### Green Belt Management Strategy

- 5.49. According to Policy EP47, the Council approved a Green Belt Management Strategy which sets out the Council's vision of the future of Harrow's Green Belt. The policy states that the strategy forms supplementary planning guidance and decisions on planning applications should be in conformity. However, the strategy was produced in 1985 and is now dated. A revised strategy document, produced by Land Use Consultants in 2004, is presently at draft consultation stage but is considered to be more up to date for development control purposes.
- 5.50. The draft strategy identifies six different types of landscape character areas. Within these areas the report recognises that derelict and

neglected buildings detract from the quality of the landscape. The strategy sets out 10 strategic objectives for the future of Harrow's Green Belt to be implemented through a range of actions. Of these, a feasibility study to improve pedestrian and cycle access between Pinner Park and Copse Farm pastures is recommended under 'Informal Recreation Provision' objectives; and a feasibility study on the future use of Copse Farm is identified under 'Agriculture Objectives'.

#### Areas of Special Character

- 5.51. The Areas of Special Character designated in Harrow largely consist of sloping ground. Their character is defined by a wide range of features such as ponds, meadows, hedges, ancient field patterns, copses, dykes, ditches, individual or groups of historically interesting or attractive buildings and important views and skylines.
- 5.52. Policy EP31 deals with sites of special character and states that within such areas, the Council will:
- Resist the loss of, or damage to, features which contribute to the area of special character;
  - Preserve architectural and historic features which contribute to the character of the area;
  - Protect skylines and views from intrusive development; and
  - Ensure that development schemes preserve or improve the character and appearance of the area.

### Conservation Area

5.53. Policy D14 seeks to enhance the character or appearance of the Conservation Areas. This is to be achieved by:

- Seeking to retain buildings, trees and other features important to the character or appearance of the area;
- To permit redevelopment only when this would contribute to the area by preserving or enhancing its character or appearance;
- Preparing specific policies and proposals for each Conservation Area, within the framework of the plan; and
- Preparing supplementary planning guidance to be applied to existing or proposed development within the Conservation Areas.

5.54. The policy also states that there will be a presumption against the demolition of buildings which make a positive contribution to the character or appearance of a Conservation Area. If a building makes a neutral contribution, its value will be assessed against any proposed redevelopment.

5.55. Under Policy D16, the preservation of the character or appearance of Conservation Areas may be considered to override other plan policies and building control standards in appropriate cases. Supporting text confirms that the preservation or enhancement of their character or appearance is given high priority by the Council.

### Draft Brookshill Drive & Grimsdyke Conservation Area Appraisal

5.56. The Draft Conservation Area Appraisal distinguishes Brookshill Drive from the Grimsdyke Estate. There is reference to the countryside feel and limited modern development; however the appraisal also notes that Brookshill Drive has a relatively suburban character. The appraisal goes on to highlight how, due to the geographical and characteristic differences of each area, the Brookshill Drive and Grimsdyke Estate areas will be considered as two separate character areas. Cope Farm

should therefore be considered as part of the Brookshill Drive area when making a determination based upon criteria set out in the Conservation Area Statement.

- 5.57. Paragraph 3.6 provides guidance on what the Council feels is important about the layout and architecture of Copse Farm and highlights how Dairy Cottage and Farm Cottage have been locally listed, and the adjoining surrounding stables are locally listed for their group value.
- 5.58. The Conservation Area Appraisal separates the application site into two farms, namely Copse Farm and Brookshill Farm and states that Copse Farm's courtyard and Brookshill's horseshoe layout are integral forms, essential to the area's character. The Draft Appraisal states that "these well constructed vernacular buildings are similar in scale, style, materials, giving the area a cohesive character". It advises that the detailing is characteristic of Victorian domestic architecture, particularly in terms of the chimney stacks and barge-boarding. Small paned windows, pitched tilted roofs and timber doors are also stated to be typical features. Paragraph 3.10 provides similar advice in respect of the farmyard associated with Copse Farmhouse.
- 5.59. The management strategy identifies what it claims to be negative features and proposed actions to remedy them. A number of these items relate to Copse Farm / Brookshill Farm. These are outlined below:
- The need to secure the long term future of the site. The response to this highlights that the farm buildings need to be retained in their integral farm layout in order to maintain the local character.
  - A further negative feature is seen as the lack of maintenance of the farm buildings.

- It is claimed that the security equipment at Copse Farm is a negative feature and it is proposed that the Council will enforce on unlawful security equipment, lighting, CCTV and fencing which impacts on the buildings' or area's character.
- Fly tipping is considered a negative feature. The council will work with the Highway teams to install a timber height restriction on the barrier at the junction with Old Redding.

#### Views

5.60. Policy D31 relates to views and landmarks within Harrow. The application site is partially visible from a viewpoint off Old Redding offering a panoramic view of the Borough. The Council will resist development that has an adverse impact on important local views, panoramas and prospects, and will seek to ensure that public access to identified viewpoints is maintained and enhanced.

#### Housing

5.61. Supporting text to Policy H3 'New Housing' states that land for new housing is severely limited in Harrow. In recognition of the number of additional dwellings that should be provided, the Council seeks to make the best use of appropriate vacant sites with or without planning permission and those remaining undeveloped for long periods.

5.62. Policy H4 'Residential Density' re-affirms Government advice in PPG3 to make effective use of land. However, supporting text confirms that consideration will be given to the design and appearance of new development, such as within the Green Belt and Conservation Areas, to ensure that this does not detract from established local character and amenity.

5.63. The most recent housing needs survey was carried out in 2002, which is now slightly out of date. A new survey is currently being carried out

by Harrow Council as part of the LDF preparation, however, the results are not yet complete or available to the public.

#### Design of New Development and Residential Amenity

- 5.64. A high standard of design is expected in all new development as required under Policy D4. Relevant criteria include site and setting; context, scale and character; energy efficiency, renewable energy, sustainable design and construction; layout, access and movement; safety; landscape and open space. Applications for new build residential development are expected to provide a design statement.
- 5.65. Policy D5 seeks the provision of adequate amenity space within new development, and adequate separation between buildings to protect amenity and the privacy of adjacent occupiers.
- 5.66. All existing trees, including those to be removed are required to be shown clearly in site layout plans according to Policy D10. A landscape scheme prior to approval is also required.
- 5.67. The Council encourages the retention and the restoration of existing locally listed buildings which preserve their architectural or historic interests under Policy D12.

#### New Work Space Accommodation

- 5.68. Strategic Objective 5 of the UDP aims to promote economic development and facilitate a balanced economy, and help contribute to the provision of a range of jobs and training opportunities.
- 5.69. Policy EM12 relates to the provision of small industrial units and workshops. However, supporting text also refers to office floorspace. The policy confirms that the Council will encourage the development of

smaller units, subject to their environmental impact including local amenity, the character of the area and traffic.

### **Summary of Planning Policy Context**

5.70. The planning policy context of the site demonstrates that a number of policy tests will have to be addressed by the proposed development, particularly in relation to Green Belt, Conservation Area, Area of Special Character and Housing issues. These are summarised below:

#### Green Belt

- Is the development appropriate development in the Green Belt, and not in conflict with Green Belt objectives?
- Is the visual amenity and openness of the Green Belt unharmed by the development?
- If it is inappropriate development, do very special circumstances exist to justify the development?
- Does the proposal meet the requirements of UDP Policy EP33, EP34 & EP37?

#### Conservation Area

- Is the character and appearance of the Grimsdyke Estate and Brookshill Drive Conservation Area preserved or enhanced?

#### Locally Listed Buildings

- Some of the buildings on the application site have been locally listed by Harrow Council. Although there are no statutory powers protecting a building on the local list, the Council generally considers that such buildings have some special characteristic that should be retained / protected.

### Housing

- Is the site suitable for residential development?
- Is the development sustainable, by making best use of the redevelopment of previously developed land whilst respecting local character and amenity?
- Will the development enhance the existing environment?

### New Work Space Accommodation

- Will the proposed work space use result in a detriment to local amenity, the character of the area and highway safety?

## 6. CONSIDERATION OF MAIN PLANNING ISSUES

6.1. Having identified the site's relevant planning policy context at section 5, it is clear that the main tests for redevelopment are imposed by its Green Belt, Conservation Area and Area of Special Character designations plus the local listing of some of the buildings on the application site. Any development on the site will also have to address the tests imposed by the relevant housing and environmental policies. The following paragraphs appraise the development against the relevant policy tests and demonstrate that the proposed development accords with national, regional and local planning policy.

### **Green Belt**

6.2. The site's Green Belt designation imposes a number of tests that any development would have to satisfy, as well as the policy objectives of Harrow's UDP. The issues are assessed below.

### ***Appropriate and inappropriate development in the Green Belt***

6.3. The proposed development is considered to be appropriate when measured against Green Belt Policy, as it meets all of the tests set out in PPG2. These tests are reviewed individually below. It is worthwhile noting here that there is no policy resistance, either national or local, to the presence or introduction of residential uses in the Green Belt. The Green Belt in Harrow already includes a great deal of housing, including at Copse Farm itself. PPG2 also includes policy guidance specifically on the extension and rebuilding of dwellings. It is therefore considered that residential use is not inappropriate development per se.

### THE RE-USE OF EXISTING LAND AND BUILDINGS

6.4. As highlighted in section 5 of this report, PPG2 accepts that existing buildings in the Green Belt can be re-used without prejudicing its

openness, since the buildings are already there. The reuse of buildings is also, therefore, considered “appropriate” development.

- 6.5. Policy 4B.6 of the GLA Sustainable Design and Construction SPG, confirms that Boroughs should ensure that future developments meet a set of criteria, including measures to re-use existing land and buildings. The current scheme proposes to re-use as many of the existing buildings as is practical and feasible, in line with policy EP37 of the Harrow UDP and Government guidance. Whilst the existing buildings proposed for reuse are not dwellings but barns and agricultural outbuildings, we consider the outcome would be no different in terms of impact on the function and characteristics of the Green Belt.
- 6.6. On this point, it should be noted that PPG2 does not require or envisage the reuse of buildings in the Green Belt being solely for their original or previous function. Paragraph 3.7 makes it clear that reuse can be for other purposes and that this would be preferable to dereliction and vandalism. Therefore, the fact that the application is for reuse for residential, does not make it inappropriate development or in conflict with PPG2.

#### EXTENSION TO AND ALTERATION OF DWELLINGS

- 6.7. PPG2 confirms that the extension or alteration of dwellings is not inappropriate in the Green Belt, provided that it does not result in disproportionate additions over and above the size of the original building. Whilst the existing buildings are not dwellings but barns and agricultural outbuildings, we consider the outcome would be no different in term of consequences for the role and characteristics of the Green Belt. The accepted policy principle is that existing buildings can be altered and extended, subject to controls, without comprising inappropriate development.

- 6.8. The design of the current proposals follows the basic pattern of that which currently exists on site. The established footprint of each group of buildings is broadly maintained, although there is a net reduction in the overall gross footprint area of some 352 sq m. All of those buildings on the application site which have been locally listed, and are considered to have particular architectural merit will be retained and refurbished, helping to ensure that the local character is maintained, in line with the criteria outlined in paragraph 3.8 of PPG2.
- 6.9. As with the successful appeal at Limes Lodge in Stanmore (summary of decision in Appendix 1), which sought the replacement of mobile homes with one, substantial detached dwelling, the proposed development forming this application will replace existing buildings and hardstanding, and therefore should be considered appropriate development in the Green Belt.
- 6.10. In the case at Limes Lodge, the scheme was considered appropriate, since the application proposals would result in smaller volume and footprint than the combined total potential footprint of each unit that would be allowed under Permitted Development rights.
- 6.11. Planning appeal (ref T/APP/M5450/A/99/1023616/PG) was allowed in October 1999 at Woolmer House, Priory Close, Stanmore (summarised in Appendix 1) for alterations, first floor extensions, rear gables and front canopy entrance. The proposals were to add between 12% - 15% to the volume of the building. Although neither PPG2 nor the Harrow UDP provided guidelines to determine an acceptable limit, the Council's witness referred to a 'rule of thumb' of 10% - 15% used to judge whether extensions could be regarded as 'limited'.

- 6.12. Since the total volume of the proposals forming this application would result in a decrease of in the total footprint of the development and increase the total volume by just 7.82%, using this rule of thumb of between 10% - 15%, the proposals set out in this application are therefore acceptable development in the Green Belt.

#### GENERAL DESIGN OF THE PROPOSALS

- 6.13. The form, bulk and general design of the proposed development is in keeping with the surrounding area and the existing buildings. We are proposing to retain the timber barn and the brick riding stables that are locally listed. The open hayloft is also to be retained. Where the proposals seek to demolish the existing buildings, the new buildings respectfully reflect the form and layout of those which currently exist and improve the quality of the site by removing the run down buildings which currently detract from the area.
- 6.14. The Design and Access Statement, submitted as part of this planning application, explains how the design of the new elements is such that the proposed development will reflect and respond to the retained buildings and the local area.

#### INAPPROPRIATE DEVELOPMENT ARISING FROM HARM TO THE GREEN BELT

- 6.15. PPG2 states that the key characteristic of the Green Belt is that of openness. It also explains the "inappropriate" development is anything which would cause harm to the Green Belt. A relevant test might, therefore, be to assess whether harm might result from impacts upon openness.

#### *Impact on the openness and visual amenity of the Green Belt*

- 6.16. In order to assess the potential impact of the proposed development on the openness and visual amenity of the Green Belt, it is helpful to

understand the existing character of the site in order to make comparisons with what is being proposed.

*Existing*

- 6.17. The site is occupied by numerous buildings and areas of hardstanding. It forms previously developed land and, as such, is relatively built up in relation to surrounding Green Belt land to the south, west and north. The site appears as part of the built development focused on and around Brookshill Drive.
- 6.18. It should be noted that the existing buildings and the large areas of fenced hardstanding already have an impact on the visual amenity and openness of the Green Belt. The site contains a significant amount of existing buildings, spread through its area. In fact, the application site is made up of an area which is covered in buildings, hardstanding and access areas. These form a clear visual block in local views of the surrounding open land in the Green Belt.
- 6.19. The current residential uses include car parking in visible, open locations garaging and domestic gardens. The run-down nature of many of the unused buildings and the open areas might be argued to result in an "adverse impact". The overall presence is one of a built up site, of a neglected nature but with clear evidence of residential occupation and the leftover structures, lighting and surfacing from a, now, historic use.
- 6.20. The site is bordered on the east by private residential uses, therefore, public views into the site are restricted to views from the public footpath passing through the site and via the site's vehicular access points from the road and partial views from land to the north at a public car park along Old Redding.

- 6.21. In respect of views from the public footpath, to the south of the site the land slopes upwards limiting views into the application site. Further, land to the east of the footpath along the edge of the meadow is well planted with mature hedges and trees providing significant screening to the site. As the footpath passes through the site to join the access roads, there are views into the east and west parts of the site, but these are of substantial areas of buildings. To the west, the view is of a large, functional and relatively recent barn with a ménage. To the east is the significant presence of the former hay barn and associated buildings. Further, the northern and eastern border of the 'Copse Farm' site is heavily planted with mature tall hedging acting as a barrier to views into the application site from the north.
- 6.22. Views of the application site from Old Redding are, as previously stated, limited due to the topography of the land between the road and the site and due to the presence of a large number of trees and hedging to the north west of the site.
- 6.23. From Brookshill Drive, the site appears as a built up area in local views. Brookshill Drive has a relatively suburban nature and the presence of development on the application site is not unnatural in local views and character.
- 6.24. In summary, the site is not particularly open to external views, either locally or at a distance. Whilst there are certain glimpses through the site at a very local level (for example, through the access gates), these are limited and not widespread or generally available.
- 6.25. It should be recognised that the guidance in PPG2 in respect of openness, has its basis in the function of Green Belt policy of keeping land open in order to prevent urban sprawl. In this context, it must be

acknowledged that the application site is not “open”. Rather, it includes a significant amount of built development.

*Proposed*

- 6.26. Views into and around the site have been produced by Kenneth W Reed Associates, forming part of this application. These show before and after views, providing an excellent visual impression of the potential “impact” of the proposed scheme on the character and perceived openness of the area.
- 6.27. The layout and scale of the proposed new dwellings has been sensitively designed to ensure that the impact on the visual amenity and openness of the Green Belt will not exceed that of the existing development. Furthermore, the visual impact of the development will be improved by the upgrading of the buildings on the site and the removal of unattractive buildings and structures.
- 6.28. The total footprint of the current proposals amounts to 1,981 sq m. when compared with the existing footprint of some 2,333 sq m, it is clear, therefore, that the proposals will not compromise the existing actual, or perceived, openness of the Green Belt by virtue of the fact that they reduce the footprint by some 508 sq m.
- 6.29. The ménage to the south of the eastern courtyard as well as the ménage in the west courtyard would be removed and re-landscaped, resulting in an enhancement to the openness of the Green Belt. As can be seen by the table in appendix 2, the total hardstanding on the Copse Farm will be reduced in the proposed development by some 2,268 sq m to just over 2,500 sq m. This reduction in footprint of the hardstanding is in addition to the reduction in footprint of the buildings, which will help improve the openness of the Green Belt.

6.30. The proposed development is sensitively accommodated within the site, since it is more contained in its spread than the existing development. In particular, the hard surfaced fenced ménages will be removed and not replaced with new structures. For the above reasons, the application proposal is considered to have less impact on the openness of the Green Belt than the existing development. The proposed development is, therefore, in compliance with PPG2 and policies within Harrow's adopted UDP.

6.31. It is our opinion that the removal of much of the existing hardstanding and structures on the site would be a considerable improvement to the appearance and openness of the Green Belt.

6.32. In light of the above, the proposed development would have less of an impact than the existing buildings / surfaces on the openness of the Green Belt and would help preserve and enhance the open nature of the Green Belt in accordance with PPG2 and adopted UDP policies. It would also improve the visual characteristics of the site which, at present, appear to need some material attention to achieve a fitting presence to this part of the Green Belt.

SUMMARY: APPROPRIATE DEVELOPMENT IN THE GREEN BELT

6.33. We conclude, therefore, that the application proposals form appropriate development in the Green Belt for the following reasons:

- a. Residential use is appropriate in the Green Belt;
- b. The reuse of buildings is appropriate development in the Green Belt;
- c. The reuse of existing buildings for different uses is appropriate development in the Green Belt;
- d. Appropriate extensions and alterations to dwellings in the Green Belt is appropriate development in the Green Belt;

- e. The proposals forming this planning application would not be harmful to the Green Belt due to impact on the openness, and therefore the proposals are appropriate development.

VERY SPECIAL CIRCUMSTANCES

- 6.34. According to PPG2, it is only necessary to show that a development comprises very special circumstances, if that development is considered inappropriate development in the Green Belt. For the reasons outlined above, the application proposals should be considered appropriate development in the Green Belt and, therefore, the applicant need not show that very special circumstances apply. However, in order to provide a comprehensive analysis, we have applied these tests to the application proposals.
  
- 6.35. In our opinion, the proposed development will also result in significant planning benefits that collectively constitute very special circumstances in support of the proposal. These can be summarised as follows:
  - a) The reduction in the footprint spread of the built envelope on the site, the sensitive and respectful layout and design of the proposed buildings and sympathetic landscaping will maintain and enhance the openness of the Green Belt;
  - b) The proposed residential use will be more in keeping with the nature of adjoining land uses;
  - c) The recycling of previously developed land, in accordance with PPG3 and the London Plan. This will assist in safeguarding open countryside from encroachment, in line with the purposes of including land within the Green Belt (PPG2);
  - d) The removal of unsightly buildings on the site, and their replacement and conversion to dwellings of a high design standard which will respect the site, the amenities of neighbouring properties and the character of the area;

- e) The 'greening' of the application site through the reduction of the building footprint, and the retention of existing trees and additional planting;
- f) A sensitively designed scheme for residential development would ensure the long-term sustainable use of the site and safeguard the visual amenity and openness of the Green Belt;
- g) The proposed reuse will provide a viable future which is not available via any other form of use. The only obvious alternative is the dereliction of buildings both within the Green Belt and a Conservation Area. With this could come the associated overgrowing of the planting on site, which could have the dual effect of reducing any current appearance of openness;
- h) Copse farm represents a built asset for which a viable future should be found. Its redevelopment would provide local housing and business space without any harm to the Green Belt.

6.36. Accordingly, it is considered that the development conforms to the underlying principles of PPG2. However, any proposals for development within the Green Belt also need to comply with the requirements of UDP Policy EP33 and its criteria.

COMPLIANCE WITH ADOPTED UDP POLICIES EP32, EP33, EP34 AND EP37

6.37. The proposed scheme is considered to comply with the criteria set out in the adopted Harrow UDP. Policy EP33 in particular, provides specific criteria which proposals should meet, as follows:

6.38. Criterion a) requires the proposal to be appropriate to its Green Belt location. Residential uses are not uncommon within the Green Belt and are not inherently inappropriate. Paragraphs 6.3 – 6.33 of this report highlights that residential development is an appropriate use in the Green Belt; this has been further addressed in Paragraph 6.52 – 6.58, which deals with the suitability of the site for residential use.

- 6.39. Criterion b) requires the proposal to be well designed in relation to the size and shape of the site and to ensure sufficient space exists within the site and its surroundings. The proposed scheme has been sensitively designed with respect to the site characteristics and ensures the same space to maintain views and the existing character of the site and locality. The proposed scheme reflects the form and layout of the existing development and, where possible, the proposals seek to retain existing buildings and redevelop so as to improve quality while retaining the character of the existing buildings. Where this has not been possible, we have kept the same layout and the proposed buildings are of similar appearance. The result of this is that the proposed development will have a similar appearance and will fit as well with the surroundings. Please also refer to the Design and Access Statement for a more detailed comparison.
- 6.40. Criterion c) seeks the retention of the openness and character of the Green Belt. Whilst this issue has been addressed in Paragraphs 6.16-6.32, the buildings adopt previous footprints, there is no material difference in the scale and bulk of the proposed buildings, the development maintains long views through the courtyard and other gaps through the site are to be maintained. The scheme also has a similar level of massing to the existing buildings. Full details of the existing and proposed floorspace and volume can be found in Appendix 2. Plan references 1347/1050 to 1347/1069 provide useful images which show existing and proposed views through the application site and plan reference 1347/1070 shows how the proposed development will fit in context with the existing buildings.
- 6.41. Criterion d) seeks a high standard of landscaping and the retention of existing trees and natural features on the site. The proposal seeks to retain all trees and boundary treatments on the site as well as the

addition of new planting. It also compliments the natural features of the site; such as in the design of House No 9 which makes excellent use of changes in ground levels. Whilst the scheme proposes new planting, it will still be in character with the rural nature of the area and won't diminish openness.

6.42. Criterion e) seeks to assess whether any proposed structure would conflict with the purposes and the functioning of the Green Belt. The proposed development complies with the purposes of including land within the Green Belt as set out in Paragraph of 1.5 of PPG2 for the following reasons:

- The fact that the application site sits within the body of the Green Belt, is not on the edge of a large built up area and already contains a significant amount of development, clearly indicates that its reuse as proposed under this planning application, would not put at risk Green Belt purposes. It would not result in the unrestricted sprawl of a large urban area.
- The Green Belt on this location has the purposes of separating Harrow to the South from Watford to the north. The application site falls within the Green Belt in an area which, whilst there is established development, is no a sensitive pinch point in that function of separation. Further, bearing in mind that the site already contains a greater footprint of built development than is proposed, there can be no claim that the proposal would cause neighbouring towns to merge.
- The redevelopment of an already built up site would not encroach into the countryside. The surrounding open land would remain as such and, indeed, areas of hardstanding would be removed and replaced with a more fitting landscaped solution.
- This part of the Green Belt has no function in preserving the setting and character of historic towns. Whilst an important function in

appropriate circumstances, the redevelopment of this already built up site will not compromise this basic Green Belt function.

- The protective status applied by the Green Belt is, in part, directed at encroaching urban renewal by enforcing an inward looking approach in urban areas. Again, this is a valid policy approach but one not compromised by the application scheme. The proposal is a direct and constructive response to the application site, its existing buildings and its redevelopment constraints. It is not, therefore, an alternative to the reuse of urban land. Further, the recycling of land at Copse Farm delivers similar aspirations to those in PPG2, in that the reuse of this brownfield site will reduce the reliance on Greenfield land.

6.43. The proposal also complies with the purpose of including land within the Green Belt as set out in Paragraph 1.6 of PPG2. Paragraph 1.6 states that the use of land in Green Belt has a positive role to play in fulfilling the following objectives;

- To provide opportunities for access to the open countryside and for outdoor sport and recreation for urban populations;

Whilst a Green Belt function per se, it is not one which applies to all parts of the Green Belt. The application site has been in farm / rural uses for many years, rather than general public access for recreation. Its reuse as proposed will not, therefore, diminish any such opportunities. The existing bridleway will be retained and views will therefore be enhanced for public benefit.

- To retain attractive landscapes, and enhance landscapes, near to where people live;

As highlighted in the Draft Conservation Area Appraisal, the Brookshill Drive area has a relatively suburban character. The proposals will

retain and enhance the existing landscapes by redeveloping existing buildings which are worth keeping and demolishing and replacing unattractive derelict buildings. The greening of the site will help to retain the attractive landscape. This will be further helped by the removal of much of the hardstanding currently on site.

- To improve damaged and derelict land around towns;

The proposals forming this application demolish derelict and unattractive buildings, replacing them with well designed buildings which follow existing form and design. The proposed buildings will exceed BREEAM guidelines on sustainable development and the visual improvement will be a material benefit.

- To secure nature conservation interests;

The scheme redevelops previously developed land, and will remove existing hardstanding from the site and replace this with landscaping. This site is already built up and offers no nature conservation value, however, all surrounding open areas will be retained and the former ménages returned to landscape. Further details are outlined in the Ecological Survey, submitted with this application.

- To retain land in agricultural, forestry and related uses.

A function of the Green Belt is to resist the loss of agricultural land to development. The application scheme will not take agricultural / forestry land. All such open land in the area will be maintained. The application has taken expert advice on the prospects for reusing the existing land and building for rural uses and has been advised that there is no commercial future. The proposal is only to reuse the exiting built up area, which will allow all open lands to remain in agricultural use.

- 6.44. Criterion f) requires new development to have no adverse visual impact on the skyline and adjacent areas. The proposal would not result in any detrimental visual impact on the skyline and adjacent areas. The proposed buildings would largely follow the lines of the existing buildings, and would therefore expect no visual difference in terms of views. In particular, the loss of the large agricultural barn makes a positive contribution to the views of the skyline.
- 6.45. Lastly, criterion g), in the case of replacement dwellings, seeks no material increase in site coverage, bulk and height of buildings. Whilst, the proposal does not involve the replacement of any dwellings at the site it does propose the replacement of existing buildings for the purpose of dwelling houses. In this regard, the proposal would result in a reduction in site coverage in terms of built footprint by some 352 sq m and also, would not result in a material increase in the height or bulk of existing buildings in terms of their appearance within the Green Belt. Using Harrow Council's rule of thumb, which indicates that extensions of between 10% – 15% could be regarded as 'limited', the current application proposals will see an increase in volume of less than 8% and therefore the application proposals should be deemed as limited.
- 6.46. It is considered that the proposed application site can be regarded as 'redundant' land within the Green Belt for the purposes of policy EP33. Accordingly, the proposal is considered to comply with the criteria set out in PPG2 in that it would have no greater impact on the openness of the Green Belt than the existing development; it would contribute to the achievement of the objectives for the use of the land in Green Belts; it would not exceed the overall volume of the existing buildings and would occupy a smaller area of the site than existing buildings.

6.47. The proposal is also fully compliant with Policy EP34 of the adopted UDP in that the proposed extensions to the two-storey stable block are subservient to the main buildings and appropriate in terms of bulk, height, site coverage and do not impact on the Green Belt character. The proposal also reduces environmental problems through physical and visual enhancements of retained buildings and overall site appearance.

### **Conservation Area**

6.48. In line with PPG15, which states that the objective of preservation can be achieved either by development which makes a positive contribution to an area's character or appearance, or by development which leaves character and appearance unharmed; the proposals of this planning application seek to retain and enhance those buildings of local architectural significance, while demolishing those which are considered to detract from the Conservation Area and replace them with buildings of high quality design which make a positive contribution to the area's character.

6.49. It is clear that Policies D14 and EP31 of the adopted UDP require any new proposals to preserve or enhance the character and appearance of both the Grimsdyke Estate and Brookshill Drive Conservation Area and the Harrow Weald Ridge Area of Special Character. It is relevant to note that the extent of the designation places Copse Farm at the very edge of the designation. The Draft Conservation Area Appraisal separates the Conservation Area into two distinct areas with the greater focus of the Conservation Area on the Grimsdyke Estate which is a little distance away, relatively enclosed and not viewed directly alongside Copse Farm. The application site falls within the Brookshill Drive area. The character and appearance most important to protect is, therefore, that relative to the immediate surroundings of the application site, against which it could have the greatest impact.

6.50. The proposed dwellings have been designed to respect and complement the sensitive area in which they would be sited. The detailed design of the dwellings and the overall scheme layout has been shaped by consultation with Conservation Officers of the LB Harrow and are considered to both preserve and enhance the Grimsdyke Estate and Brookshill Drive Conservation Area and the Harrow Weald Ridge Area of Special Character through:

- The removal of unsightly buildings which display no features characteristic to the Conservation Area as highlighted in the Draft Management Strategy;
- The removal of hard surfaced areas;
- The retention and restoration of locally listed buildings, preserving their architectural and historic interest;
- The design of high quality new housing which respects the character and design of surrounding development and the natural relief of the site;
- The introduction of new planting and landscaping;
- Materials in character with local buildings; and
- The retention of "Farmyard" central spaces.

6.51. The design takes particular care in preserving the form and layout of Copse Farm, particularly retaining the Courtyard and Horseshoe layout, which is specifically highlighted as a special feature in the Brookshill Drive and Grimsdyke Conservation Area Appraisal.

### **Housing**

6.52. There are a number of housing issues that the proposed development should address, which are discussed in the following paragraphs.

SUITABILITY OF THE SITE FOR RESIDENTIAL USE

- 6.53. The majority of the buildings on the site are in poor condition and in need of substantial refurbishment or redevelopment if any form of use is to continue in the long-term, be it agricultural, rural, commercial or residential. This essential work would be very expensive and is considered as the primary reason why no offers have been forthcoming for the site, thus far, for agricultural / rural / commercial purposes. A letter dated 4<sup>th</sup> February 2004 from Suzanne's Riding School, the previous occupier and owner, to the Head of Planning at the London Borough of Harrow has been attached as Appendix 3 to this Statement. The letter confirms that operating costs forced the business to re-locate and that there had been no interest shown in the site for its continuance as a riding school or any similar use.
- 6.54. Copse Farm is presently occupied by three residential dwellings at 'Dairy Cottage', 'Farm Cottage' and 'Copse Farm House' (These do not form part of the application site). Further, there are numerous residential properties to the north and east of the site along Brookshill Drive. The site is served by two existing roads which provide acceptable access to the proposed development.
- 6.55. As indicated above, PPG3 encourages the recycling of previously developed land for housing. PPG 3 recognise that not all development can take place in urban areas. Accordingly, the principle of redeveloping a brownfield site for housing should be supported in this location.
- 6.56. As demonstrated at section 5, there is a shortage of housing land within Harrow, and the UDP accepts that a proportion of the Borough Plan's housing requirement must be accommodated on unidentified sites and, through the conversion of existing buildings to residential use. The proposed development will result in the net increase of 14

dwellings on the site which will contribute towards satisfying the UDP housing requirement for the Borough, and help reduce the pressure for Greenfield development.

6.57. Residential development will replace existing unsightly outbuildings which are old and unsafe and of no particular architectural merit. The loss of these buildings, and the conversion and upgrading of existing structures to provide residential dwellings, will enhance the amenity of the adjacent residential occupiers.

6.58. Further, the site is in an accessible location, it is close to local facilities and the development would enhance an existing community. The use of the site for housing development should, therefore, be welcomed.

#### DENSITY / MIX

6.59. Paragraph 57 of revised PPG3 (Housing) advises that Local Planning Authorities should avoid the inefficient use of land, and seek to avoid development of less than 30 dwellings per hectare (12 per acre), in order to reduce pressure to develop on Greenfield sites or on valuable open space within built areas. Although, the density of the application scheme (13dph) is below this minimum density level it is considered appropriate in the context of the nature of the site and the surrounding residential uses and is in compliance with Green Belt policy. The proposed development optimises the site's development potential, whilst respecting the low-density character of the surrounding area and maintaining the openness of the Green Belt. It falls below the threshold for affordable housing provision, but provides a mixture of unit-sizes in accordance with national and local guidance.

#### DESIGN

6.60. Good design is promoted by PPS1, PPG3 and policy D4 of the adopted UDP. The proposed layout and building designs achieve a sensitive

response to the character of the site and surrounding residential development, and add interest and consistency through the choice of a range of locally characteristic materials. Key design principles include:

- Limiting the height of the proposed dwellings;
- Additional planting of trees and vegetation within the site;
- Greening the site through the use of green roofs to dwellings 3, 11, 12, 13 and 14, which also delivers sustainability objectives;
- Sustainable design through the use of super insulation including triple and double glazing, the use of solar panels, Biomass boilers and ground source heat pump systems to reduce carbon emissions and save energy consumption; and
- Reducing the footprint of the new dwellings relative to the original buildings by approximately 15%.

#### AMENITY SPACE

6.61. In accordance with policy D5 of the adopted UDP on amenity space provision in residential development, the proposed scheme provides adequate amenity space which is sufficient to protect the privacy and amenity of occupiers of the proposed and existing surrounding buildings.

#### **New Work Space Accommodation**

6.62. The current scheme proposes to retain the existing barn and convert the space for use as offices. This followed from discussions with Conservation Officers at Harrow Council, who advised that this would be less harmful to the existing building than residential use. It is considered that the proposed office space would help preserve and enhance the Conservation Area by retaining the integrity of the barn.

6.63. In accordance with National planning policy (PPG4) and the UDP policy, the creation of a small office unit, by means of converting an existing locally listed building, would be an appropriate use in that it would:

- Preserve and enhance the locally listed building which contributes to the character of the Conservation Area and Area of Special Character;
- Not result in any detrimental impact on the amenity of surrounding residential occupiers by virtue of its size;
- Not create any significant highways problems given the expected limited number of vehicular movements

#### **Agricultural Viability and Marketing of Copse Farm**

6.64. In circumstances where proposals seek to reuse buildings in the Green Belt, PPG2 does not require proof that the buildings cannot continue or return to their last or original use.

6.65. Whilst PPG15 recommends the marketing of listed buildings which are due to be demolished, either in part or in full, there are no listed buildings on the application site, although some have been locally listed. Where possible, these buildings will be restored and converted into residential dwellings in order to preserve their future. Since there are no statutory regulations protecting locally listed buildings, the controls over these are far less than the statutorily listed buildings which are regulated by PPG15. However, as the lack of marketing information was raised as a criticism of the previous application by the Council, the applicant has provided a Viability Statement, which includes marketing information, in support of this application.

6.66. As can be seen in the Report on the Viability of the unit for Agricultural, Equestrian or Alternative Countryside Uses, carried out by Simmonds and Sons, the likelihood that Copse Farm could be operated

as a viable agricultural unit is very limited, unless used for an intensive livestock enterprise. This would, in all likelihood, increase the intensity of development and might therefore result in development which would be otherwise be considered contrary to policies within PPG2 and the adopted UDP, which aim to maintain the openness of the Green Belt. Section 5.2 of the report states that the area of the farm is not big enough for a dairy unit and any beef or sheep enterprise would not be financially viable on a farm of this limited size.

## **7. RESPONSE TO RECOMMENDED REASONS FOR REFUSAL OF THE PREVIOUS APPLICATION**

### Reason 1

*"The proposed development is inappropriate development and very special circumstances to justify it being allowed in the Green Belt have not been demonstrated to the satisfaction of the Local Planning Authority".*

- 7.1. As has been highlighted in section 6 of this report, the proposals forming this planning application do not form inappropriate development, and therefore do not need to show very special circumstances to justify development.
- 7.2. Residential development is considered appropriate development in the Green Belt, as is the reuse of existing buildings, since this will not prejudice the openness of the Green Belt. Limited extensions to existing buildings are also considered appropriate development in the Green Belt, provided that they do not result in disproportionate additions over and above the size of the existing buildings. A "rule of thumb" used by Harrow Council allows for extensions of around 10 – 15%.

### Reason 2:

*"The proposed houses, by virtue of size, siting and suburban layout, would provide excessive bulk, result in an excessive loss of openness, be visually intrusive and overbearing and give rise to a suburban form of development on this rural site, to the detriment of the streetscene, the character of the Green Belt, The Area of Special Character and would fail to preserve or enhance and appearance of the Brookshill Drive and Grimsdyke Estate Conservation Area".*

- 7.3. Following the withdrawal of the original planning application, careful consideration has been given to the proposals so that the revised scheme addresses issues concerning the above comments. The scheme has been redesigned in order to meet concerns raised by both the planning officers and conservation officers.
- 7.4. In particular, houses 1 and 2 have been completely redesigned so that their footprint falls within that of the building to be demolished. They have been designed in such a way that they are in keeping with the existing buildings and the character of the site.
- 7.5. House 3 has been removed from its previous location and will now sit adjacent to houses 11, 12, 13 and 14 on the footprint of the agricultural shed, formerly used as the indoor arena. They are set at the low level of the shed and are hidden under a curving sedum grass roof; this has left the view through the western courtyard unchanged. The height of the house to the left of the Hayloft has been reduced in order to retain the openness.
- 7.6. Under the current proposals, the barn is to be repaired and converted to offices. This will not only maintain the openness and character of Copse Farm, but will improve the quality of the structure and therefore the setting of the Conservation Area.
- 7.7. We have responded in full to the Local Planning Authority's criticisms of the original planning application. The redesign has been discussed and agreed with conservation officers at Harrow Council, and further details of the design and responses to consultation are outlined in full in the Design and Access Statement submitted with the planning application.

### Reason 3

*"The excessive number of on site parking spaces proposed would lead to a loss of openness and the area's semi-rural atmosphere to the detriment of the character of the Green Belt and the character and appearance of the Brookshill Drive and Grimsdyke Estate Conservation Area".*

- 7.8. When the development site functioned as a riding school, around 35 cars would have been parked on site each day. Riding lessons would be held at the school daily, which in itself would produce considerable traffic movement from visitors and parents delivering and picking up children for riding lessons. In addition to the 72 horses owned by the school, a further 27 were accommodated in the school as livery horses, which would attract daily traffic from the owners as well as substantial horse box traffic transporting the horses for the purposes of shows etc.
- 7.9. Agricultural uses are likely to have larger vehicles as well as more machinery which would create a greater impact on the setting of the Green Belt and the Conservation Area. The proposals forming this application reduce car parking on the site. The scheme has been amended since the original application in order to alleviate concerns on this matter. Any reuse of the site, even agriculture, would require car parking. If the Local Planning Authority remains resistant to new buildings, this car parking would be visible. The limited which the applicant proposes would have no impact on the openness of the Green Belt and would, potentially, be lower than other possible uses.

### Reason 4

*"The proposal would give rise to the unacceptable demolition of locally listed buildings which make a positive contribution to the character and appearance of the Conservation Area".*

7.10. The timber barn and brick riding stables are to be retained, as is the open hayloft, which will continue to be a feature of the site. The current scheme minimises disruption to the external appearance of the locally listed buildings, while providing them with a viable future. Many of the locally listed buildings will be retained under the current proposals; they will be refurbished and developed as residential dwellings, which would facilitate their ongoing contribution to the Conservation Area.

## 8. CONCLUSIONS

8.1. From the preceding analysis, it can be seen, this planning application accords with national, regional and local planning policy, as highlighted in paragraph 1.5 of this statement, this compliance can be summarized as follows:

- The proposals constituting this application are appropriate development within the Green Belt;
- Very special circumstances also exist to provide additional justification for this form of development in the Green Belt;
- The development, by virtue of design and overall reduction in build footprint, will have a reduced impact on the openness of the Green Belt;
- The visual quality of the site will be enhanced;
- The scheme will preserve and enhance the character and appearance of the Brookshill Drive and Grimsdyke Estate Conservation Area.
- A previously developed site will be recycled for residential use and contribute towards the Borough's housing requirements;
- A development scheme of high design quality will be created which will enhance the amenity and character of the surrounding environment;
- The functions of the Green Belt in this area will not be compromised;
- The proposals include the restoration and improvement of locally listed buildings;
- The proposal would result in a highly sustainable and environmentally responsible development in accordance with National Planning Policy.
- The scheme will re-use previously developed land and buildings for relatively low-density residential development which respects the

character of the surrounding area and safeguards the countryside from encroachment.

- The proposals will remove unsightly buildings which have little or no architectural significance and provide dwellings of high quality design.
- Locally listed buildings on the site will be retained and restored, therefore preserving and enhancing the character of the Brookshill and Grimsdyke Estate Conservation Area and the Harrow Weald Ridge Area of Special Character.
- The openness of the Green Belt will be preserved and enhanced as a result of these proposals, which will improve the visual quality by reducing the existing footprint, introducing additional planting and retaining all existing mature trees and vegetation;
- The introduction of sustainable development practices which reduce environmental emissions and conserve energy consumption and natural resources.