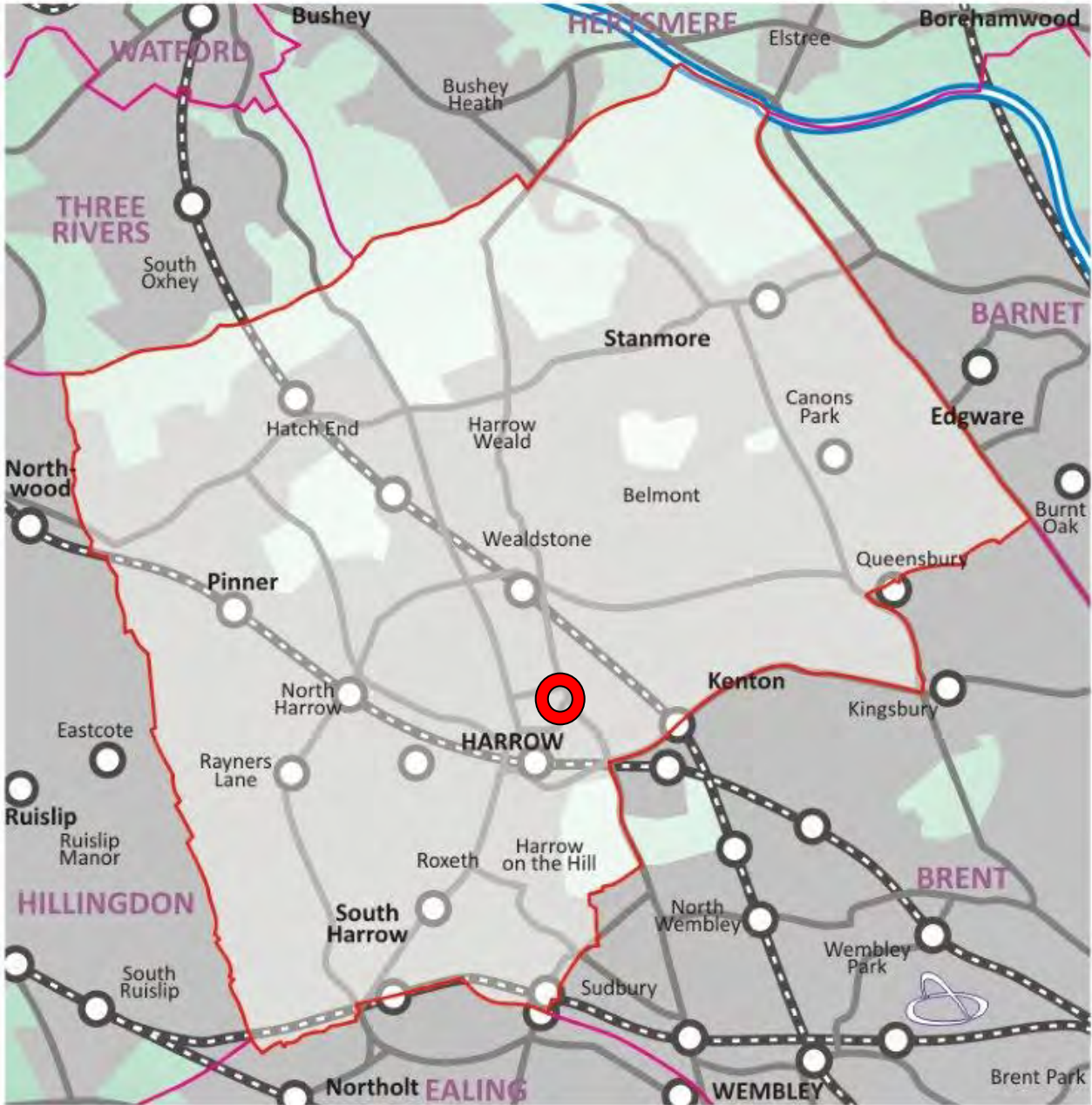
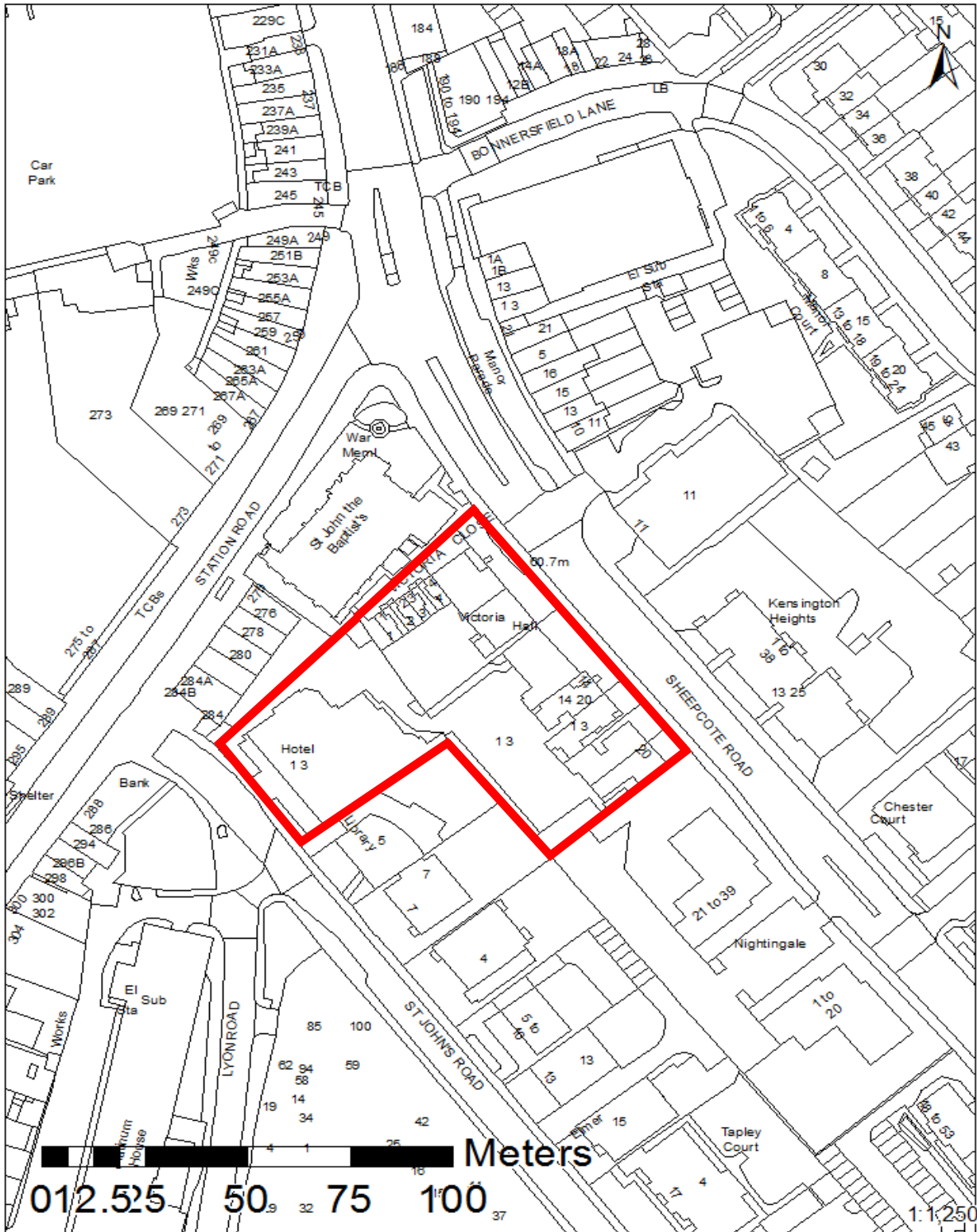


 = application site



<b>Former Cumberland Hotel and Victoria Hall, 1-3 St John's Road, Harrow</b>	<b>P/4332/17</b>
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<p><b>Former Cumberland Hotel and Victoria Hall, St Johns Road, Harrow</b></p>	<p><b>P/4332/17</b></p>
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# LONDON BOROUGH OF HARROW

## PLANNING COMMITTEE

14<sup>th</sup> DECEMBER 2017

**APPLICATION NUMBER:** P/4332/17  
**VALIDATE DATE:** 06/10/2017  
**LOCATION:** FORMER CUMBERLAND HOTEL , 1-3 ST JOHN'S ROAD, HARROW, VICTORIA HALL, SHEEPCOTE ROAD, HARROW, NOS. 1 TO 4 VICTORIA CLOSE, SHEEPCOTE ROAD, HARROW  
**WARD:** GREENHILL  
**POSTCODE:** HA1 3EF, HA1 2JN AND HA1 2JE  
**APPLICANT:** ORIGIN HOUSING  
**AGENT:** JLL  
**CASE OFFICER:** SUSHILA BHANDARI  
**EXPIRY DATE:** 05/01/2018

### PURPOSE OF REPORT/PROPOSAL

The purpose of this report is to set out the Officer recommendations to the Planning Committee regarding an application for planning permission relating to the following proposal.

*Redevelopment of the former Cumberland Hotel ,Victoria Hall and houses on Victoria Close to provide 569 m2 for the new Victoria Hall community facilities (Use Class D2), 204 residential flats (Use Class C3), 78.9 m2 floorspace for a flexible retail unit along St Johns Road (Use Classes A1-A4, B1, C3, D1 and D2) in buildings up to 16 storeys in height; a pedestrian link between Sheepecote Road and St Johns Road and associated plaza; basement and ground floor servicing and parking; amenity space, hard and soft landscaping; and plant room*

The Planning Committee is asked to:

### RECOMMENDATION A

- 1) agree the reasons for approval as set out in this report, and
- 2) refer this application to the Mayor of London (the GLA) as a Stage 2 referral; and
- 3) subject to the Mayor of London (or delegated authorised officer) advising that he is content to allow the Council to determine the case itself and does not wish to direct refusal, or to issue a direction under Article 7 that he does not wish to direct refusal, or to issue a direction under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application delegate authority to the Divisional Director of Regeneration, Enterprise and Planning in consultation with the Director of Legal and Governance Services for the completion of the Section 106 legal agreement and other enabling development

and issue of the planning permission and subject to minor amendments to the conditions or the legal agreement. The Section 106 Agreement Heads of Terms would cover the following matters:

### **Affordable Housing and Wheelchair Homes**

A minimum of 27 homes to be provided as affordable rented and 54 as intermediate housing

10% of affordable homes to be constructed as wheelchair accessible

Early Review Mechanism if not implemented within 2 years and a further late review mechanism to capture any uplift in profit, threshold of which to be negotiated

### **Play Space Provision**

Contribution of £1,045 towards the improvement of an existing play space area within the locality of the site

### **Employment and Training**

The developer to submit to the Council for approval, prior to commencement of the development, a Training and Recruitment Plan. The developer to implement the agreed Plan

The developer to use all reasonable endeavours to secure the use of local suppliers and apprentices during the construction of the development

### **Public Realm**

Payment of £20,000.00 towards the upgrade of the public pathway linking the site and the carriageway of St John's Road prior to commencement of development

### **Transport and Highways**

The developer to enter into a section 278 agreement to undertake the necessary modifications of vehicle access points on Sheepcote Road and St John's Road

Submission of Travel Plans in accordance with the timings set out in the Travel Plan Strategy

A travel plan bond of £10,000 will be required to be used by the Council to remedy any failure to comply with the terms of the approved travel plan.

Payment of a Travel Plan Monitoring Fee of £5,000 for the purposes of monitoring the operation and effectiveness of the travel plan

The developer to ensure the effective implementation, monitoring and management of the travel plan for the site

Payment of £5,000 to the provision of an on street car club space in the vicinity of the development site.

Payment of £10,000 towards the provision of TfL quiet way cycle link

Payment of £10,000 towards the provision of legible London wayfinding signs

Exclusion of future occupiers of the development from applying to the Council for residents permits

### **Carbon Offset**

Provision of actual carbon emissions and payment of any additional contribution if the on-site carbon reductions stated in the strategy are not achieved

### **Decentralised Energy Networks**

In the event of any future district decentralised energy network becoming available, the developer to use all reasonable endeavours to agree terms pursuant to a connection between the site-wide CHP system and the decentralised energy network.

The developer to safeguard a route to be agreed with the Council to enable a connection to any future district decentralised energy network.

### **Legal Costs, Administration and Monitoring**

A financial contribution (to be agreed) to be paid by the developer to the Council to reimburse the Council's legal costs associated with the preparation of the planning obligation and a further financial obligation (to be agreed) to be paid to reimburse the Council's administrative costs associated with monitoring compliance with the obligation terms

## **RECOMMENDATION B**

That if the Section 106 Agreement is not completed by 7<sup>th</sup> June 2018 or as such extended period as may be agreed by the Divisional Director of Regeneration, Enterprise and Planning in consultation with the Chair of the Planning Committee, then it is recommended to delegate the decision to REFUSE planning permission to the Divisional Director of Regeneration, Enterprise and Planning on the grounds that:

The proposed development, in the absence of a Legal Agreement to provide appropriate improvements, benefits and monitoring that directly relate to the development, would fail to adequately mitigate the impact of the development on the wider area and provide for necessary social, environmental and physical infrastructural improvements arising directly from the development, contrary to the National Planning Policy Framework (2012), policies 3.11, 3.13, 5.2, 6.3, 7.4, 7.5, 7.6, and 7.19 of The London Plan (2016), Core Strategy (2012) policy CS1, policies AAP4, AAP13 and AAP19 of the Harrow and Wealdstone Area Action Plan(2013) and policies DM1, DM2 DM42, DM43 and DM50 of the Harrow Development Management Polices Local Plan and the Supplementary Planning Document: Planning Obligations (2013).

## **REASON FOR THE RECOMMENDATIONS**

The principle of redevelopment of the former hotel site has already been established through the granted of planning permission under ref: P/0586/15. This current application seeks to now include the land comprising Victoria Hall and the four houses located on Victoria Close to provide a comprehensive redevelopment of the larger site. The development would provide a new modernised community hall, 200 additional new homes and a commercial unit fronting St John's Road.

The site is currently occupied by a dated hotel, community hall and dwellings which are characterised by a varied configuration of built forms depicting the era that they were constructed. The proposed redevelopment of the site would be a positive contribution to the town centre environment and would add to the current regeneration of the area that is currently being delivered through the redevelopment of a number of nearby sites, such as the Lyon Road and Gayton Road schemes. The loss of the hotel itself, given its size, is afforded no protection in the adopted development plan. There would be no loss of community floor space on the site and the four houses that would be lost through the redevelopment would be re-provided onsite in addition to the proposed 200 new units. The redevelopment of the site would enhance the urban environment in terms of material presence, attractive streetscape, and good routes, access and makes a positive contribution to the local area, in terms of quality and character.

The proposed development would secure the provision of onsite affordable housing at a level that meets the minimum affordable housing target set out in the development plan. Overall, the number of units proposed would positively add to the Council's housing delivery targets.

The proposed redevelopment of the site would result in a modern, contemporary design that responds positively to the local context, and would provide appropriate living conditions which would be accessible for all future occupiers of the development.

The layout and orientation of the buildings and separation distances to neighbouring properties is considered to be satisfactory to protect the amenities of the neighbouring occupiers and the development would contribute towards the strategic objectives of reducing the carbon emissions of the borough.

The decision to grant planning permission has been taken having regard to the National Planning Policy Framework (2012), the policies of The London Plan (2016), Harrow's Core Strategy (2012), the policies of the Harrow and Wealdstone Area Action Plan (2013) and the policies of the Harrow Development Management Policies Local Plan (2013), as well as to all relevant material considerations including the responses to consultation.

## **INFORMATION**

This application is reported to Planning Committee as it is a Major Development and therefore falls outside Schedule 1 of the Scheme of Delegation.

Statutory Return Type:	Major Application
Council Interest:	Pavement along Sheepcote Road and St Johns Road is adopted highway
GLA Community Infrastructure Levy (CIL) Contribution (provisional):	To be confirmed
Local CIL requirement:	To be confirmed

## **HUMAN RIGHTS ACT**

The provisions of the Human Rights Act 1998 have been taken into account in the processing of the application and the preparation of this report.

## **EQUALITIES**

In determining this planning application the Council has regard to its equalities obligations including its obligations under section 149 of the Equality Act 2010.

For the purposes of this application there are no adverse equalities issues.

## **S17 CRIME & DISORDER ACT**

Policies 7.3.B and 7.13.B of The London Plan and Policy DM1 of the Development Management Policies Local Plan require all new developments to have regard to safety and the measures to reduce crime in the design of development proposal. It is considered that the development does not adversely affect crime risk.

## **LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985 BACKGROUND PAPERS USED IN PREPARING THIS REPORT:**

- Planning Application
- Statutory Register of Planning Decisions
- Correspondence with Adjoining Occupiers
- Correspondence with Statutory Bodies
- Correspondence with other Council Departments
- Nation Planning Policy Framework
- London Plan
- Local Plan - Core Strategy, Development Management Policies, SPGs
- Other relevant guidance

## **LIST OF ENCLOSURES / APPENDICES:**

Officer Report:  
Part 1: Planning Application Fact Sheet  
Part 2: Officer Assessment  
Appendix 1 – Conditions and Informatives  
Appendix 2 – Site Plan  
Appendix 3 – Plans and Elevations

## OFFICER REPORT

### PART 1: Planning Application Fact Sheet

The Site	
Address	<b>Former Cumberland Hotel , 1-3 St John's Road, Harrow, , Victoria Hall, Sheepcote Road, Harrow, Nos. 1 to 4 Victoria Close, Sheepcote Road, Harrow</b>
Applicant	<b>Origin Housing</b>
Ward	Greenhill
Local Plan allocation	<b><u>n/a</u></b>
Conservation Area	<b><u>n/a</u></b>
Listed Building	<b><u>n/a</u></b>
Setting of Listed Building	<b><u>Within setting of St John Baptist Church</u></b>
Building of Local Interest	<b><u>n/a</u></b>
Tree Preservation Order	<b><u>n/a</u></b>
Other	

Housing		
Density	Proposed Density hr/ha	1,018
	Proposed Density u/ph	385
	PTAL	6a
	London Plan Density Range	650-1100
Dwelling Mix	Studio (no. / %)	11
	1 bed ( no. / %)	56
	2 bed ( no. / %)	131
	3 bed ( no. / %)	6
	4 bed ( no. / %)	
	Overall % of Affordable Housing	40% (by units) 42% (by habitable rooms)
	Social Rent (no. / %)	33.3% (by units) 34.2% (by habitable rooms)
	Intermediate (no. / %)	66.7% (by units) 65.8% (by habitable rooms)
	Private (no. / %)	59.1%
	Commuted Sum	
	Comply with London Housing SPG?	Yes
	Comply with London Housing SPG?	Yes
Comply with M4(2) of Building Regulations?	Yes	



<b>Non-residential Uses</b>		
Existing Use(s)	Existing Use / Operator	C2/ C3/ D1
	Existing Use Class(es) sqm	4,698.95sqm
Proposed Use(s)	Proposed Use / Operator	C3/ D1/ Flexible use(A1-A5/B1/D1/D2)
	Proposed Use Class(es) sqm	23,660.5sqm
Employment	Existing number of jobs	
	Proposed number of jobs	

<b>Transportation</b>		
Car parking	No. Existing Car Parking spaces	57
	No. Proposed Car Parking spaces	84
	Proposed Parking Ratio	0.3
Cycle Parking	No. Existing Cycle Parking spaces	0
	No. Proposed Cycle Parking spaces	514
	Cycle Parking Ratio	
Public Transport	PTAL Rating	6a
	Closest Rail Station / Distance (m)	Harrow on the Hill/ 582m
	Bus Routes	114, 140, 183, 186, 258 and 340
Parking Controls	Controlled Parking Zone?	Yes
	CPZ Hours	8.30am to 6.30pm
	Previous CPZ Consultation (if not in a CPZ)	
	Other on-street controls	
Parking Stress	Area/streets of parking stress survey	200m walking distance
	Dates/times of parking stress survey	17 <sup>th</sup> / 18 <sup>th</sup> September 2014 at 3am
	Summary of results of survey	Parking stress of 11%/ 17.2%
Refuse/Recycling Collection	Summary of proposed refuse/recycling strategy	Each block will have its own designated bin store. On day of collection bins will be wheeled to bin holding area located on St Johns Road

<b>Sustainability / Energy</b>	
BREEAM Rating	
Development complies with Part L 2013?	Reduction of 45.5% CO <sup>2</sup> combined site wide
Renewable Energy Source / %	PV panels

## **PART 2: Assessment**

### **1.0 SITE DESCRIPTION**

- 1.1 The former hotel site comprises a group of buildings ranging from single storey to three storeys in height. The site contains a number of Victorian and post war buildings of various configurations, with the main entrance to the hotel from St John's Road
- 1.2 Victoria Hall is a two storey, late 1960's built community hall which connects to Victoria Close which comprises four, three storey terraced dwelling houses.
- 1.3 The site is bounded by St John's Road to the south west and Sheepcote Road to the north east.
- 1.4 Nightingale Court is situated on Sheepcote Road and is located to the south of the subject site, and comprises residential flats within two buildings of four storeys in height.
- 1.5 Also immediately to the south of the subject site and fronting St John's Road is Gayton Road Library which is a five storey building.
- 1.6 Adjacent to this library is an office building known as 'Bank House' which is a four storey building which also adjoins the lower south west boundary of the application site.
- 1.7 To the north of the hotel buildings fronting St John's Road is a service road serving the retail premises located at Nos.276 to 284 (odds only) Station Road.
- 1.8 To the northeast of the main hotel building is St John's Church which is a Grade II listed church building. As such the subject redevelopment would be within the setting of this heritage asset.
- 1.9 Directly opposite the main hotel entrance is St John's Road public car park and Platinum House which is a residential development ranging in height from five to eight storey in height with an additional two floors at ground and first floor levels forming part of the under-croft parking for the flats and additional pay and display spaces at ground floor level.
- 1.10 To the south west of the main hotel building is the Lyon Road redevelopment site which formerly comprised offices buildings known as Equitable House and Lyon House. The site is under construction and would provide a mixed use development comprising a range of building heights, with the maximum height being 14 storeys at the junction with Lyon Road and St John's Road. As part of this development, section 106 contributions have been secured for comprehensive public realm works in the area of land fronting this new redevelopment, which would encompass the public car park at the start of St John's Road and would also front the subject site.

1.11 The subject site is located within Harrow Town Centre East and within the Harrow and Wealdstone Opportunity Area (as upgraded following the consolidation of the amendments to the London Plan in 2015).

1.12 The site is also located within a high public transport accessibility area (6a).

## **2.0 PROPOSAL**

2.1 The proposal seeks to demolish the existing buildings on the site and to redevelop the site to provide 204 residential flats, a new community hall and a flexible use commercial unit, along with a pedestrian link between Sheepcote Road and St John's Road, new vehicular access on Sheepcote Road, associated bicycle/ refuse stores and basement car parking.

2.2 The development would comprise three blocks ranging in height from single storey to sixteen storeys.

### **Block A**

2.3 Block A would front Sheepcote Road and would be 8 storeys in height, with the top storey being set back. This block would form a 'T' shaped footprint, with the rear outrigger providing a separation between the two external amenity areas.

2.4 This block would have a total of 75 units of which 27 units would be affordable rented and 48 units would be in shared ownership (intermediate housing), ranging from 1 bed to 3 bed units.

2.5 This block would be served by a single core entrance, with a secondary means of access from the private residential route through. The upper floors would be served by four lifts, of which two would be wheelchair compliant.

2.6 The two ground floor units fronting Sheepcote Road would have individual access in addition to the access from the core.

2.7 The ground floor would also contain two cycle stores serving Block A and Block B and a refuse store containing 22 bins.

### **Block B**

2.8 Block B would be linked to Block A from first floor onwards and would be 7 storeys in height at the front, dropping down to single storey at the rear. This block would take the form of an 'L' shaped footprint and would link with Block C at the rear (fronting St John's Road).

2.9 The ground floor of this building would form part of the community hall known as Victoria Hall. The entrance to the hall would be off the public route though located along the northern flank elevation of the proposed building. The community hall would contain a total of three halls, an ancillary office, a kitchen, WC facilities and associated storage. It is also proposed to install a lift to facilitate access to and from the basement car park.

- 2.10 The upper floors would comprise residential units which would be accessed from a single core. The principal access would be from Sheepcote Road, with a secondary access from the undercroft. The upper floors would be served by two lifts.
- 2.11 A total of 24 units are proposed within this block of which all would be 2bed 4 person units. All units would be private tenure.
- 2.12 The ground floor of this building would also contain a refuse store which would have capacity to hold 6 bins to serve this block.

### **Block C**

- 2.13 Block C would comprise the tallest elements of the proposed development with two linked blocks with a height of 11 and 16 storeys respectively. The 16 storey element would front St John's Road.
- 2.14 This block would be served by a single core, accessed from the southern corner of the building fronting St John's Road. A secondary access is proposed from the private residential route, located to the south of the proposed block. The upper floors would be served by two lifts, of which one would be wheelchair compliant. The two ground floor units fronting the private residential route through would also have individual access from this route as well as internal access.
- 2.15 A commercial unit is proposed in the north western corner of this block, which would have a GIA of 78.9sqm and would be accessed from St John's Road frontage.
- 2.16 The ground floor of the building would also contain two refuse stores, capable of storing 6 bins and 21 bins respectively.
- 2.17 This block would contain a total of 105 units of which 99 units would be in private tenure and 6 units would be in shared ownership tenure and would range from studios to 2 bed units.

### **Overall site**

- 2.18 Each unit would have access to a private balcony/ terrace, and access to two communal amenity areas located centrally within the site and to the south of Block A.
- 2.19 A new vehicle access point is proposed along the southern most section fronting Sheepcote Road, which would provide a ramped access to the basement parking area. The new vehicle access would have an approximate width of 5.4m. The existing access on Sheepcote road would be closed. A new drop-off point is proposed for the new community hall which would be located along the northern most frontage of Sheepcote Road.
- 2.20 It is also proposed to construct a new pedestrian link between Sheepcote Road and St John's Road with associated landscaping, raised planters and

boundary fencing. Entrance gates are proposed at either end of this pedestrian link, which would be set back from the pavement end and would restrict access through during the late evening/ night time. A further private pedestrian route is proposed which would be accessed through an undercroft located in between Blocks A and B and would provide a through route through to St John's Road and the private communal areas.

2.21 An electric substation is proposed adjacent to the southern site boundary adjoining Garden House, which would have a footprint of 6m x 4m.

2.22 The basement level would have a total GIA of 3522sqm and would largely cover the site area. The basement would comprise of 85 car parking spaces in total, of which 22 spaces would be dedicated for the use of the community hall. 20 of the spaces would be wheelchair compliant spaces. The basement would also provide space for motorcycle parking, cycle stores, plant rooms and a refuse store for the community hall. Each of the building cores can also be accessed from the basement. In addition a dedicated cycle lift is proposed which would provide access to the external pedestrian route above.

### 3.0 RELEVANT PLANNING HISTORY

3.1 A summary of the relevant planning application history is set out in the table below:

Ref no.	Description	Status and date of decision
P/0586/15	Demolition of existing hotel buildings (use class c1) and phased redevelopment of the site to provide 121 residential flats (use class c3) including affordable housing within two blocks with basement and ranging from five to nine storeys in height; a pedestrian link between shepcote road and St John's Road with associated landscaping, raised planters, boundary treatment, entrance gates; new vehicle crossover with access drive on shepcote road (reinstatement of existing vehicle access points), associated mechanical and ventilation plant, refuse stores, bicycle and car parking spaces; pv panels	Granted 06/10/2015

#### 4.0 **CONSULTATION**

- 4.1 A Site Notice was erected on 13.10.2017 expiring on 3.11.2017.
- 4.2 Press Notice was advertised in the Harrow Times on the 12.10.2017, expiring on 2.11.2017.
- 4.3 The application was advertised as a major application and being within the settling of a Listed Building.
- 4.4 A total of 827 consultation letters were sent to neighbouring properties regarding this application.
- 4.5 The overall public consultation period expired on 31.10.2017

#### 4.6 **Adjoining Properties**

Number of letters Sent	827
Number of Responses Received	7
Number in Support	2
Number of Objections	5
Number of other Representations (neither objecting or supporting)	0

- 4.7 5 objections were received from nearby residents.
- 4.8 A summary of the responses received along with the Officer comments are set out below:

<b>Details of Representation</b>	<b>Summary of Comments</b>	<b>Officer Comments</b>
Peter Belgrave Court St John's Road Harrow HA1 2DB	Objects to the application due to: <ul style="list-style-type: none"><li>• Loss of light and overshadowing.</li><li>• Overlooking/ loss of privacy.</li><li>• Visual amenity – scale of development not in keeping with surrounding developments.</li><li>• Adequacy of parking/ loading/ turning – access to this site is restricted.</li></ul>	All points raised are addressed under the relevant sections of the appraisal below.

	<ul style="list-style-type: none"> <li>• Traffic generation – add to congestion and impact on number of accidents.</li> <li>• Noise and disturbance – from building work, road damage, traffic and in additional to influx of 600+ people and increase in cars.</li> <li>• Hazardous materials – dust from construction work.</li> <li>• Layout and density of building – over bearing, out of scale, out of character compared to existing building in the area that are typically 4 storeys maximum.</li> <li>• Design, appearance and materials – not in keeping will have impact on the listed building.</li> <li>• Road access – not sufficient access.</li> <li>• Affect setting of Listed Building – will have negative impact on the church.</li> </ul>	
<p>Olga Lappas 42 Curtis Court Lyon Road Harrow HA1 2EW</p>	<ul style="list-style-type: none"> <li>• Affects the character and appearance of the streetscape.</li> <li>• Fails to respect the scale and proportions of the original buildings and established scale of buildings.</li> <li>• Changes the skyline dramatically – horizon to the north-east of St Johns will completely disappear.</li> </ul>	<p>All points raised are addressed under the relevant sections of the appraisal below.</p>
<p>Brian Saperia &amp; Diana Saperia 1 Gerard Road Harrow HA1 2<sup>ND</sup></p>	<ul style="list-style-type: none"> <li>• Why are the online proposals different from those on public display at the site?</li> <li>• What consultation will there be about the infrastructure issues of yet another major residential development?</li> <li>• Harrow does not need new retail development.</li> <li>• Harrow’s architectural</li> </ul>	



	<p>character is already at risk and would be further damaged by such a high rise development.</p>	
<p>James Jackson Belgrave Court St Johns Road Harrow HA1 2DB</p>	<ul style="list-style-type: none"> <li>• Loss of light/ overshadowing.</li> <li>• Overlooked/ loss of privacy.</li> <li>• Visual amenity.</li> <li>• Increased noise and traffic generation.</li> <li>• The effect on a listed building.</li> <li>• Layout and density of building.</li> <li>• The design, appearance and materials of the building.</li> <li>• Landscaping.</li> <li>• Road access.</li> <li>• Proposed possible height.</li> <li>• A conservation area will be affected.</li> <li>• Parking and loading inadequate.</li> <li>• 95 documents listed on the website, that is difficult to access and slow.</li> <li>• Note the several letters of support which indicates that certain stakeholders were consulted from the outset – were other stakeholders consulted.</li> </ul>	<ul style="list-style-type: none"> <li>• Matters relating to loss of light, privacy, visual amenity, traffic, parking, layout, density, design, settling on listed building, landscaping and access are dealt with under the relevant sections of the appraisal below.</li> <li>• The proposal site is not sited within close proximity to any conservation area.</li> <li>• Issues of the website are noted. However a hard copy of all the plans and document were available to view at the local Gayton Road Library. The consultation letter sent out to residents clearly set this out. As such local residents have not been prejudiced in any way in terms of commenting on the proposal.</li> <li>• The applicant did undertake a public consultation event, prior to the submission of this application, in which number of local residents and businesses were invited to come and view the proposals.</li> </ul>

<p>Mrs L Ong Flat 527 Platinum House, Lyon Road Harrow HA1 2EX</p>	<ul style="list-style-type: none"> <li>• Overdevelopment of the site – scale, height and massing of Block C – poor architectural response to the form of development and the general townscape of Harrow.</li> <li>• Design and Access Statement – perspective on front cover attempt to conceal the over dominant scale.</li> <li>• Detrimental impact on visual amenity – the comment from the Design Review panel and subsequent scheme amendments has only served to increase overshadowing.</li> <li>• Statement of community involvement – no flyer delivered and therefore not aware of the public consultation.</li> <li>• Block C Front Elevation – in contact demonstrates perfectly that its scale and height are completely out of keeping with the streetscape and overdevelopment of the southern part of the site.</li> <li>• Contextual site section/ composited plan – proposed 16 storey block detrimentally affects the unique nature of the 14 storey Lyon Square corner building.</li> <li>• No need for a gateway.</li> <li>• 60% of views currently afforded through the living room facing Block C will be blocked due to its location, size and vertical height.</li> </ul>	<ul style="list-style-type: none"> <li>• All matters are dealt with under the relevant sections of the appraisal below.</li> </ul>
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4.9 Statutory and Non Statutory Consultation

4.10 The following consultations have been undertaken:

LBH Environmental Health
LBH Highways
LBH Planning Policy
LBH Design
LBH Conservation Officer
LBH Tree Officer
LBH Landscape Architects
LBH Cycling
LBH Lighting Section
LBH Waste Officer
TFL
EDF Energy (Network PLC)
Historic England - GLASS
Environment Agency
Designing Out Crime Officer, Metropolitan Police Service
National Grid Transco
Thames Water Authority

4.11 External Consultation

4.12 A summary of the consultation responses received along with the Officer comments are set out in the Table below.

Consultee	Summary of Comments	Officer Comments
The Campaign for a better Harrow environment	<ul style="list-style-type: none"> <li>Environment Agency's flood map shows the proposed development lies on a flood plain.</li> <li>Muir Associates reject the advice given by Harrow Council that the maximum build-up of pluvial floodwater could be up to 600mm and used a figure of 300mm instead.</li> <li>Concerns over the possible impact of this development on people living and working nearby in the town centre.</li> <li>What happens to public drains that area already overflowing and the</li> </ul>	Noted. The Council's Drainage Authority has confirmed that the site has two localised flooding areas (zone 3a). However, they consider that the submitted Flood Risk Assessment is satisfactory, but that 40% climate change should be used in the future surface water storage calculations. On this basis they have recommended their standard conditions and

	<p>attenuation tanks at the site are full.</p> <ul style="list-style-type: none"> <li>• Major disruption occurred in Wealdstone when water pipes burst – extra pollution from delayed traffic and hours wasted are part of the costs to Harrow people.</li> <li>• The intensification going on in Harrow and other London Boroughs should have been accompanied by modernisation of the infrastructure.</li> <li>• Proposal is too big for a small site on a flood plain in an overdeveloped area.</li> </ul>	informative.
Thames Water	<ul style="list-style-type: none"> <li>• No objection to the proposed development – advise given in respect of waste, surface water drainage, sewage infrastructure, piling and groundwater discharge.</li> </ul>	Noted and appropriate informatives suggested.
London Underground	No comments to make on this application.	Noted.
Natural England	No comment to make on this application. Refer to standing advice.	Noted.
GLA	<p>Opportunity Area: The comprehensive residential-led mixed use redevelopment of this highly accessible town centre site is strongly supported in line with London Plan policies 2.13 and 3.3, and policies SD1 and H1 of the draft London Plan.</p> <ul style="list-style-type: none"> <li>• Social infrastructure: The proposed provision of enhanced community space as part of this comprehensive redevelopment is strongly supported in line with London Plan Policy 3.16 and Policy</li> </ul>	Noted

	<p>S1 of the draft London Plan.</p> <ul style="list-style-type: none"> <li>• Housing: Notwithstanding the proposal to provide 42% affordable by habitable room, the latest Redloft exercise demonstrates that the scheme is not viable at 35% before grant. Therefore, we cannot deal with the application under 'Fast Track Route' of the AH&amp;V SPG.</li> </ul> <p>Accordingly, the Mayor will expect early and late stage review mechanisms to be secured as part of the S.106 in line with the 'Viability Tested Route' of the SPG. These should be itemised within the heads of terms of the Harrow Committee report.</p> <ul style="list-style-type: none"> <li>• Urban design: The proposed design and public realm provision is supported in line with London Plan policies 7.1 and 7.8 and policies D1 and HC1 of the draft London Plan.</li> <li>• Inclusive access: The proposed response to access and inclusion is supported in line with London Plan Policy 7.2 and Policy D3 of the draft London Plan.</li> <li>• Sustainable development: The proposed energy strategy and climate change adaptation measures are broadly supported in strategic planning terms. Once all opportunities to secure further feasible on-site carbon dioxide savings have been exhausted, a carbon offset contribution must be secured to mitigate any residual</li> </ul>	
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	<p>shortfall. The Council must secure the associated energy strategy and climate change adaptation details by way of planning condition in accordance with London Plan policies 5.2, 5.10, 5.12 and 5.13 and policies S12, S12 and S13 of the draft London Plan.</p>	
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## 5.0 **POLICIES**

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that:

‘If regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the Plan unless material considerations indicate otherwise.’

5.2 The Government has issued the National Planning Policy Framework [NPPF] which consolidates national planning policy and is a material consideration in the determination of this application.

5.3 In this instance, the Development Plan comprises The London Plan 2016 [LP] and the Local Development Framework [LDF]. The LDF comprises The Harrow Core Strategy 2012 [CS], Harrow and Wealdstone Area Action Plan 2013 [AAP], the Development Management Policies Local Plan 2013 [DMP], the Site Allocations Local Plan [SALP] 2013 and Harrow Local Area Map 2013 [LAP].

5.4 A full list of all the policies used in the consideration of this application is provided as Informative 1 in Appendix 1 of this report.

## 6.0 **ASSESSMENT**

6.1 The main issues are;

Principle of the Development  
 Regeneration  
 Affordable Housing  
 Housing Density and Unit Mix  
 Design, Character and Appearance of the Area/ Setting of Listed Building  
 Residential Amenity  
 Traffic, Safety and Parking  
 Development and Flood Risk

Accessibility  
Sustainability  
Air Quality  
Environmental Impact Assessment  
Statement of Community Involvement  
Impacts on Trees and Biodiversity  
Planning Obligations

## 6.2 Principle of Development

6.2.1 The spatial strategy for London is set out at chapter 2 of the London Plan. It uses a number of strategic designations to identify areas for more accelerated levels of change, pursuant to the objective of accommodating London's objectively assessed development needs. Among the designations are 'Opportunity Areas' and 'Intensification Areas'. As part of the now adopted London Plan, the strategic designation of Harrow & Wealdstone's has changed from that of an Intensification Area to an Opportunity Area, with an expectation that higher density residential and mixed-use development on key strategic sites will contribute to the delivery of 3,000 jobs and a minimum of 2,800 new homes within the Area. Pursuant to the delivery of the spatial strategy for London, Policy 2.13 *Opportunity Areas and Intensification Areas* of the London Plan requires proposals to:

- support the strategic policy direction for the Area;
- optimise residential and non-residential output and provide necessary infrastructure;
- contribute to meeting (or exceeding where appropriate) the Area's employment and housing outputs;
- promote inclusive access including cycling and walking; and
- support wider regeneration.

6.2.2 Harrow's spatial strategy for the plan period 2009-2026 is set-out in the Core Strategy (2012) and is predicated on a new, pro-active approach to growth management and place-making. The strategy focuses on the [now] opportunity area designation of central Harrow and Wealdstone to deliver growth through higher-density residential and mixed-use development, it being a location with high levels of public transport accessibility and where there is capacity to accommodate and benefit from major change. Pursuant to the spatial strategy, the Core Strategy incorporates an objective to create 3,000 jobs within the opportunity area and a policy commitment to deliver a minimum of 2,800 new homes on sites to be identified and allocated in an area action plan.

6.2.3 The Harrow and Wealdstone Area Action Plan (AAP) (2013) seeks to establish the opportunity area as the 'Heart of Harrow', reassert Harrow's visibility as the capital of Metro-land in London and to reaffirm Harrow town centre's role as a Metropolitan Centre. As required by the Core Strategy, the AAP identifies and allocates sites with a combined capacity of 3,684 new homes and estimates that there is potential to deliver over 3,000 jobs across the opportunity area.

6.2.4 In addition to being an Opportunity Area, the entire Heart of Harrow is also designated as a Housing Zone, which seeks to help unlock the potential to deliver more than 5,000 new homes over the plan period. Housing Zones are designed to work flexibly depending on the local circumstances, however all new developments would need to be built to high quality standards and in compliance with all relevant policies contained within the development plan. In particular, proposals will need to demonstrate how new homes will come forward in a master planned approach, delivering strong communities through urban design and achieving coherent neighbourhood.

*Loss of Hotel*

6.2.4 There are no specific policies contained within the AAP that directly relate to the loss of hotels, although it is noted that Policy AAP16 does refer to the provision of major hotel developments within the Harrow Town Centre. Similarly, there is no specific policy within the Development Management Policies Local Plan (DMP) that would apply. Strategic policy 4.5A(b) of the London Plan seeks to achieve 40,000 net additional hotel bedrooms by 2036, of which at least 10 per cent should be wheelchair accessible, sub section (c) sets out the strategic location where new visitor accommodation would be appropriate. At local decision level, policy 4.5B of the London Plan sets out that development should contribute towards the hotel provision, be consistent with the strategic location principles set out under 4.5A(c) and not result in the loss of strategically important hotel capacity.. For outside Central London locations, strategically important hotel capacity would typically comprise development exceeding 15,000 square metres.

6.2.5 Cumberland Hotel has a floor area of just under 3860 square metres with a total of 84 bedrooms and it is therefore well below the threshold of a strategically important hotels as defined in the London Plan. As noted under the history section of this report, the loss of the hotel floorspace has already been considered acceptable through the grant of planning permission to provide residential development under application P/0586/15. There have been no significant changes in planning policies, other than the adoption of an updated London Plan and the designation of the Heart of Harrow as a Housing Zone, to warrant a different decision to that reached under application P/0586/15 regard to the principle of development.

6.2.6 The application site falls within the sub area of Harrow Town Centre East as set out in the AAP. Whilst the site is not an allocated development site as defined within the adopted Site Allocations Local Plan (2013), the site is regarded as previously developed land for the purposes of the policies contained within the National Planning Policy Framework and the Harrow Core Strategy which seeks to redirect all new development the Harrow and Development Opportunity Area, to town centers and to previously developed land in suburban area. On this basis, the proposal to develop this site for residential purposes is considered to be acceptable in principle.

6.2.7 The loss of the hotel is further reinforced by the fact that the redevelopment would bring forward the delivery of affordable housing on this site which would add to the Council's housing delivery targets.



*Community Development*

- 6.2.8 Policy AAP16 (Supporting the service sector in Harrow Town Centre) will support community development amongst other service sectors, so long as proposals are consistent with other relevant policies in the AAP and contributes to the delivery of the objectives of the Harrow Core Strategy and conducive with the residential environment within the surrounding town centre.
- 6.2.9 Victoria Hall is a community hall that serves the local community and operates a number of community based events, activities and classes, as well as offering community function space. The hall is well-established in this locality. The proposal would see the demolition of the existing dated facilities to be replaced with a modern new hall. The floorspace to be provided would be slightly above (approx. 11sqm) the current floorspace and therefore there would be no net loss of any community floorspace. The slight uptake in the floorspace by 11sqm is unlikely, as discussed in detail elsewhere in this report to have any discernible impact in terms of intensity of use. Accordingly, given the established use on the site, the re-provision of the community hall on this site is supported.

*Provision of Flexible Commercial Floorspace*

- 6.2.10 The subject site falls outside of the primary shopping area of Harrow Town Centre, however, it is located within the town centre boundary. Policy AAP18 (Secondary frontages, neighbourhood parades, and non-designated retail parades) will permit within the non-designated retail parades of Harrow Town Centre, the use of ground floor premises for purposes that are appropriate town centre, community and economic use on the proviso that in the case of non-A class uses, a window display or other frontage appropriate to the centre is retained and that the use would not be detrimental to the amenities of neighbouring occupiers.
- 6.2.11 The proposal seeks to incorporate a flexible commercial unit on the ground floor of Block C fronting St John's Road. Uses would include A1, A2, A3, B1, D1 and D2. The proposal would also include the flexibility to convert the space to a C3 (residential) use.
- 6.2.12 As noted above, the subject site is not located within a designated frontage or within the primary shopping area of the town centre. The requirement of a commercial floorspace along this frontage has been borne through the Planning Committee's resolution in respect of the planning permission granted under P/0586/15. The Committee granted planning permission on the grounds that the two ground floor units fronting St John's Road were changed from residential (use class C3) to a commercial unit. The premise for this decision was on the reflection that the former hotel featured an active frontage (in form of a restaurant and drinking establishment) which although just outside the primary shopping area, added to the vitality of the town centre. As such, the principle of some form of commercial floorspace has already been established through the granted of the previous planning permission, and the former commercial uses that operated on the hotel site.

- 6.2.13 There is no objection to the proposed use of the unit for purposes that would fall within use classes A1, A2, A3, B1, D1 and D2, so long as an active frontage is maintained in respect of the non-traditional retail uses i.e. B1, D1 and D2. This can be controlled by condition.
- 6.2.14 With regard to the fall-back position of a C3 use class (residential), Officers consider that having regard to the future redevelopment of the Lyon Road public square, a residential unit fronting a public square would not activate this frontage or support the function of a public square in the same way as a commercial unit would do. However, this needs to be balanced against the risk of having a vacant unit at this location for an indefinite period of time, which the LPA would want to avoid. In order to safeguard this, it is considered that a C3 use should only come into effect after all permitted commercial/ retail avenues have first been exhausted. The Council would require evidence that the applicants have failed to secure an appropriate occupier through a comprehensive marketing report. It should be noted that the Council's Economic Development team are willing to support the applicant to deliver an appropriate end user for the commercial unit. On these grounds, an appropriate condition is imposed with regards to the intended fall-back use of the commercial unit as a C3 (residential) to ensure the use does not occur until a marketing report has been submitted to the LPA to demonstrate that there is no demand for the flexible floorspace at this location and that the C3 use shall not be brought into use until the LPA has agreed to the contents of such a marketing report in writing.

#### *Loss of Residential*

- 6.2.15 Whilst there is a general presumption against the loss of existing residential development in the current development plan, the proposals would re-provide the four houses lost as part of the redevelopment on site. In this regard, there would be no conflict with the development plan.

#### *Conclusion*

- 6.2.16 In conclusion, having regard to the fact that there is no presumption against the loss of this hotel, the re-provision of a community hall, provision of a flexible commercial floorspace and taking into consideration that the site is regarded as previously developed land, the proposed residential led redevelopment of the site is considered to be acceptable within this town centre context. On this basis, the proposal is considered to be acceptable in principle with regard to the above policies. Further there is strong support for the scheme from the GLA.

### 6.3 Regeneration

- 6.3.1 The London Borough of Harrow published a Regeneration Strategy for 2015 – 2026. The objective of this document is to deliver three core objectives over the plans life, which include;
- **Place;** Providing the homes, schools and infrastructure needed to meet the demands of our growing population and business base, with high quality

town and district centres that attract business investment and foster community engagement;

- **Communities;** Creating new jobs, breaking down barriers to employment, tackling overcrowding and fuel poverty in our homes and working alongside other services to address health and welfare issues;
- **Business;** Reinforcing our commercial centres, promoting Harrow as an investment location, addressing skills shortages, and supporting new business start-ups, developing local supply chains through procurement.

6.3.2 The proposed development would achieve the overall aspiration of regeneration of the borough. Currently, the site is underutilised, and is not the most efficient use of the site. The proposed development allows the site to be used in a much more efficient way that would at least for the short term assist in providing employment for local trade workers. Furthermore, the construction of the site would result in some temporary jobs within the Borough, which would be throughout the duration of the construction process.

6.3.3 The proposed development would provide for housing and updated community facilities within the Heart of Harrow, whereby providing a much more attractive area to further promote growth into the area. Lastly, it would provide some employment floorspace and job creation through the provision of a flexible commercial unit, the management of the community hall and the long term management of the site through maintenance and upkeep within the heart of Harrow. It is therefore considered that the proposed development would meet the overarching principles of regeneration into the area.

#### 6.4 Affordable Housing *Policy context*

6.4.1 Policy CS1.J of the Harrow Core Strategy 2012 sets an aim for 40% of new housing development in the borough to be affordable housing and states that the Council will seek the maximum reasonable amount of affordable housing on all development sites with a capacity to provide for ten or more units having regard to various criteria and the viability of the scheme. Such requirements are in line with London Plan policy 3.12.A/B which requires the maximum reasonable level of affordable housing to be provided. The reasoned justification to policy 3.12.A/B of The London Plan 2016 states that boroughs should take a reasonable and flexible approach to securing affordable housing on a site by site basis. As noted under section 1 of the appraisal, the London Plan 2016 designates Harrow and Wealdstone as an Opportunity Area and seeks to increase the minimum annual housing target for Harrow from 350 to 593 per annum.

6.4.2 Policy 3.11A of The London Plan sets out that of the 60% of the affordable housing should be for social and affordable rented accommodation and 40% for intermediate rent or sale of the overall affordable housing provision on any given development site. Policy 3.11B sets out that individual boroughs should set out in their LDF the amount of affordable housing provision needed. This is reinforced under policy AAP13(C) which states that within Wealdstone Central sub area, an affordable tenure split which favours intermediate housing will be sought. Throughout the rest of the Heart of Harrow an affordable housing

tenure split of 60% social/affordable rent homes and 40% intermediate homes are required.

- 6.4.3 Supplemental to the above policies the Mayor has produced Homes for Londoners – Affordable Housing and Viability SPG which aims to provide guidance on ways to speed up planning decisions and increase the amount of affordable housing delivered through the planning system. The SPG sets out the different threshold approach to viability appraisals. The first of which is the ‘fast track route’ (Route B) in which if the scheme delivers 35% of affordable housing, does so without any public subsidy and meets the specified tenure mix and other requirements and obligations, are not required to submit viability information. Schemes which do not meet the 35% threshold or require public subsidy, will be required to submit detailed viability information (Route A). The 35% of a scheme as affordable housing is based on habitable rooms. Under both Routes an early review mechanism will be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted. A further late (near end of development) review would also apply in the case of proposals coming forward under Route A, which is applied once 75% of units are sold. Where a surplus profit is identified this should be split 60/40 between the LPA and developer and should be in the form of contributions towards off site affordable housing provision. This would need to be secured legally through the section 106 agreement, which should also set out an agreed Benchmark Land Value that would form the basis for a comparison should an early review be triggered.

*Appraisal*

- 6.4.4 The applicant is Origin Housing, and according to the supporting documents submitted, it is an affordable housing provider with a proven track record in delivering and managing mixed tenure and mixed-use developments.
- 6.4.5 It is noted that under the Mayor’s Fast Track Route set out in the Affordable Housing and Viability SPG a Financial Viability Assessment (FVA) would not be required if 35% of affordable housing is being provided, it further sets out that a minimum proportion of 30% of each tenure type should be achieved with the remaining 40% left to the LPA to determine what tenure type is required. As stated above, Harrow seeks the proportion split of 60% affordable rented and 40% intermediate housing in line with its adopted local policies.
- 6.4.6 The scheme as submitted, proposes the provision of 65.8% shared ownership habitable rooms and 34.2% affordable rent habitable rooms. As the proposed tenure split does not comply with Harrow’s tenure split, the applicant was requested to submit a Financial Viability Appraisal (FVA) in support of this application to demonstrate that the level of affordable housing being offered, in particular regard to the affordable rented units is the maximum reasonable level that can be provided on this site.
- 6.4.7 The applicant has submitted a financial viability appraisal for the development site, which is based on the provision of 42% affordable housing of the overall housing scheme, based on habitable rooms (40% in terms of unit numbers).

This is broken down as 123 private market units, 54 shared ownership units and 27 social rented units.

- 6.4.8 The viability submitted for the 42% affordable housing scheme shows that based on the assumptions made in terms of the gross development value and the cost of the development, the residual land value when taking into consideration the benchmark value of the existing land would generate a deficit of just under £10m. The Council tendered an external review of this viability, which after adjusting some of the assumptions made (including an increase in the capitalised ground rent, including a 6% profit on affordable housing, 15% profit on the commercial unit, adjustment to the project programme timeline and the reduction in site value) and increasing the average sales value achieved per square foot to reflect the market conditions at the time of this review, still generated a deficit in excess of circa £720,000.00.
- 6.4.9 The viability assessments undertaken by Redloft and BNP both conclude that the scheme before the Council is unable to deliver more than 40% affordable housing (units) on this scheme. Officers, based on expert advice consider that should the scheme were to deliver a policy compliant tenure split of 60% affordable rent and 40% shared/ intermediate housing, it would reduce the overall provision of affordable housing on this site and would further worsen the viability position of this scheme.
- 6.4.10 Since the review of the initial FVA, the LPA have been informed that the proposed scheme would be delivered with grant funding and therefore the proposed scheme would fall outside the scope of the Mayors 'Fast Track Scheme' and would therefore fall within Route A as set out above.
- 6.4.11 The Council's Housing Enabling Team are disappointed with percentages of the tenure split being offered is more favourable towards shared ownership and advised that the applicant should make an attempt to move closer to the 60/40 policy requirement in favour of affordable rent units. As noted above, an external review demonstrates that the proposed tenure split is the maximum reasonable level that can be delivered on this site. Officers would also point out that the developer is also re-providing the community hall on this site at their own cost.
- 6.4.12 Whilst the overall percentage of affordable housing would be policy compliant, it is considered that as the scheme would not fall under Route B of the Mayors SPG, an early and late review mechanism would be required in this instance, as per the requirements of the Mayors Affordable Housing and Viability SPG. At the time of writing this appraisal, the GLA had not issued its formal Stage 1 response. However, the LPA have been provided comfort in the form of an email from the GLA Case Officer who broadly supports the assessment above and recommendations.
- Conclusion*
- 6.4.13 Whilst it is noted that the proposed tenure split would not strictly comply with the 60/40 tenure split set out in the London Plan and the AAP, it is concluded

that the level of total affordable housing at 42%, which would be secured by a section 106 agreement would meet the minimum policy requirement of 40%. Furthermore, the higher proportion of shared ownership housing would meet the key objective of the Housing Zone to deliver low cost home ownership.

- 6.4.14 Based on the above factors, it is considered that the development would accord with policies 3.11 and 3.12.A/B of The London Plan 2016, policy CS1.J of the Harrow Core Strategy 2012 and policy AAP13 of the AAP and the Mayor's SPG.

6.5 Housing Density and Unit Mix

- 6.5.1 London Plan policy 3.8 and policy AAP13 of the AAP require new development to provide a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups. London Plan policy 3.4 sets out a range of densities for new residential development.

*Density*

- 6.5.2 The site is considered to be within a Central Location and has a high Public Transport Accessibility Level [PTAL] of 6a. Although, it is noted that predominantly buildings within Harrow Metropolitan Centre are at the lower scale of the four to six storey height reference below.

**NB:** Central area are defined as areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an international, Metropolitan or Major town centre.

- 6.5.3 The London Plan sets out at Table 3.2 appropriate densities for various different areas. Table 3.2 sets out that a density of 650-1100 units per hectare and 215-405 habitable rooms per hectare would be most appropriate for this site. The development proposes a density of 385 u/ha and 1,018 hr/ha, which is within the levels set out in The London Plan 2016. In the context of the design and layout of the development and other site constraints, it is considered that such a density is appropriate in this location.

*Unit Mix*

- 6.5.4 The development would largely provide one-bed and two-bed units, with a small proportion of three-bed units as set out in the table below:

	<b>Studios</b>	<b>1 Bed</b>	<b>2 Bed</b>	<b>3 Bed</b>	<b>Total</b>
Private	10	34	79	0	<b>123</b>
Rented	0	6	19	2	<b>27</b>
Shared	1	16	33	4	<b>54</b>
<b>Total</b>	11	56	131	6	<b>204</b>

- 6.5.5 For a scheme of this scale and location in a town centre location which is likely to be attractive to small family or professional groups, it is considered that the units would be appropriate and would accord with development plan policies.

## 6.6 Design, Character and Appearance of the Area/ Setting of Listed Building

### *Policy Context*

- 6.6.1 The NPPF describes the setting of heritage assets (page 56) as ‘The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral’.
- 6.6.2 Paragraph 129 of the NPPF states that: ‘Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise’.
- 6.6.3 Paragraph 132 of the NPPF states:  
‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting’.
- 6.6.4 Paragraph 134 of the NPPF states:  
‘Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use’.
- 6.6.5 Policy 7.4 (B) of the London Plan requires that buildings, streets and open spaces should provide a high quality design response that has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass.
- 6.6.7 Core Policy CS1.B specifies that ‘All development shall respond positively to the local and historic context in terms of design, siting, density and spacing, reinforce the positive attributes of local distinctiveness whilst promoting innovative design and/or enhancing areas of poor design; extensions should respect their host building.’
- 6.6.8 Policies AAP1 and AAP4 of the AAP seeks to a high standard of development within the Harrow Town Centre and throughout the Heart of Harrow. Policy AAP1 states that development within all three sub areas of Harrow town centre will be required to strengthen its character, legibility and role as a Metropolitan Centre. Policy AAP4 sets out that inter alia, development should use high quality, durable and serviceable materials to the external finishes and should seeks to conserve and enhance the significance of heritage assets, including their settings.

### *Area Context*

- 6.6.9 The surrounding area has a strong urban character, without any significant coherence or commonality of design, with the exception of the three-storey Victorian terraced buildings to the north west of the site on Station Road. Buildings such as the Natwest Bank building, a Grade II Listed Building, St Johns Church, also Grade II Listed and Granada Cinema, also Grade II Listed provide significant landmark buildings in the immediate area and the differences in form and design of these buildings is indicative of the variety of built form in the locality. Whilst the scale and form of the buildings along Station Road are predominantly terraced and to a maximum height of four storeys, along Lyon Road to the east of Station Road, the height of building increase, with Platinum House being one of the tallest within the vicinity reaching to eight storeys in height. Congress House to the south of Platinum House is building of seven storeys. Both these buildings occupy a substantial built footprint, in particular Platinum house which occupies nearly half the width of Lyon Road itself.
- 6.6.10 To the south west of the main hotel building is the Lyon Road redevelopment site which formerly comprised offices buildings known as Equitable House and Lyon House. The sub-structure of the former office buildings shows that the buildings were seven storeys in height. The site has planning permission to construct a mixed use development comprising a range of building height, with the maximum height being 14 storeys high on the junction with Lyon Road and St Johns Road. Since the approval of P/0586/15, the Lyon Road scheme is substantially underway.

### *Setting of Listed Building*

- 6.6.11 As noted above, this proposal is within the setting of the grade II listed St Johns Church, the grade II listed war memorial and Granada Cinema.
- 6.6.12 The proposed development would not be visible in key views towards the principal elevation of the former cinema, particularly the taller parts which would be sited on St John's Road a fair distance away from the cinema.
- 6.6.13 In terms of significance, currently St John's Church is an attractive architectural landmark building defining this corner plot. It is the largest building in the immediate area, so there are good views towards it and around it that are not blocked or undermined by larger buildings in the background. This helps ensure focus on this landmark building.
- 6.6.14 The proposed Blocks A and B, facing Sheepcote Road would replace the existing bulky buildings with a series of interconnecting blocks having a neutral impact on setting. The proposed development would not change the historic functional and visual relationship between the memorial, church and churchyard in which it is situated which is a key part of their significance. There would then be no impact on the setting of these listed buildings.
- 6.6.15 Victoria Hall is sited very close to the south boundary of the church reducing its prominence in the streetscene due to its set forward positioning, bulky form



and poor quality design. The demolition of the buildings on the site would not have a harmful impact on the special interest of the listed church.

- 6.6.16 The proposed replacement would be formed of three blocks, two fronting Sheepcote Road and rising to 7 storeys (blocks A and B) and a further 10 and 16 storey block on St Johns Road (block C). The proposed blocks A and B would be situated further south from the boundary of the church than the existing building. There would be an open space provided by the public plaza between Sheepcote Road and St John's Road. This would open up views of the south elevation and enhance its presence. The proposed blocks A and B fronting Sheepcote Road would be a bit taller than the existing situation and that consented in 2015 but the impact would be similar with the bulk and scale of these buildings broken up by recessed bays and use of different façade treatments.
- 6.6.17 However, the Council's Conservation Officer has raised some concerns over Block C which would break the roofline of the church and therefore having some impact upon the landmark status. As such, clear and convincing justification would be required for any harm and public benefits need to be weighed up against the harm in accordance NPPF paragraphs 132 and 134. There would be public benefits as outlined by the supporting documents provided with this application including the provision of the plaza. These need to be carefully weighed up against the harm as outlined above.
- 6.6.18 In balancing the public benefit of this proposal, this is considered to be three-fold. Firstly the benefit of delivering much needed affordable housing is considered to be a public benefit. The scheme as discussed above, would despite a deficit, deliver 40% affordable housing, which Officers consider a significant public benefit, in light of the fact that a number of schemes recently approved having not achieved the minimum 40% required by the London Plan due to site viability. Secondly, the creation of a public pedestrian route, albeit to a lesser extent is also considered to be of some public benefit. It is considered that the delivery of significant affordable housing on this site, on balance outweighs the harm on the setting of St John Church. Thirdly, the scheme would re-provide modernised community facilities. Officers also consider that the principal views of the church on this prominent corner location would not be significantly harmed to the extent to set aside the clear public benefit of this development. In light of this justified public benefit, the proposal would give to no conflict with the guidance set out in the above policies.

*Scale*

- 6.6.19 The scheme before the Council has been developed through detailed pre-application discussions held with Officers, Design Project Officer and external design consultants.
- 6.6.20 The scheme has been presented to a design review panel, held in June 2017. The Panel summarised their comments as follows:

*“The Panel acknowledges and applauds the applicant for the comprehensive study of the additional site. The project now requires further design resolution to ensure it delivers high quality homes. It’s important that the public route and public square are combined alongside the church to create a useable and desirable public route. The massing also needs considerable thought, with the taller building on Lyon Square and Sheepcote Road blocks being more modest and part of the block. This is a key scheme for Harrow, on a prominent site in the town centre, next to a listed building – the proposal needs to raise the bar for design”.*

- 6.6.21 The heights of the buildings proposed have been amended since the initial presentation of the proposal to the DRP panel. The higher elements of the built form are located towards St Johns Road, with the highest element being 16 storeys. The scale and massing along Sheepcote Road would set the context for the much taller aspect of this scheme and that of the Lyon Road existing (Platinum House) and current development under construction along the south eastern side Lyon Road. In this regard, the height and scale of Block C, fronting St Johns Road is considered to respond positively to the scale of the established pattern of development and the redevelopment on the corner junction of Lyon Road and St Johns Road. Whilst it is acknowledged that the height of buildings on this side of St Johns Road range to a maximum height of five storeys and the small block of retail premises fronting Station Road (No.276-284 Station Road) is three storey in height, having regard to the fact that the proposed development would be located at what would be deemed as an end of street location and taking into consideration the future proposal to create a public square at this end of St John Road, which will now be realised through the implementation of the Lyon Road redevelopment, it is considered that the scale and massing albeit at sixteen storeys would be acceptable at this junction of St Johns Road. It would sit comfortably in context of the redevelopment at the corner of Lyon Road and St Johns Road and whilst that Block C would be two storeys greater than the Lyon Road scheme, having regard to the level changes, the finished roof heights for both development would broadly be level.
- 6.6.22 The frontage of Sheepcote road (Blocks A and B) would be limited to seven storeys with an eight storey set back. The massing of the elements fronting Sheepcote Road and St Johns Road would be separated by a single storey element which would form part of the community hall. This separation would serve to provide a visual break of the built form along the public access route and the private amenity space and would ensure that the proposals provide views of St Johns Church.
- 6.6.23 Whilst the height of Blocks A and B would be comparably higher than the buildings immediately surrounding the site, it is considered that the siting of the building and the creation of a public pedestrian route would create a sense of space around the buildings to help reduce the perception of scale between the subject building and church. Furthermore, the different scale of the buildings would create an interesting juxtaposition between the buildings, which is not uncommon in built up Metropolitan Centres such as this town centre.

6.6.24 When seen in context of the building to the south and east of Sheepcote Road and taking into account that the building heights range from three to four storeys in height, with traditional hipped roofs in most cases, the scale of the on Sheepcote Road would sit comfortably within the context and scale of the existing pattern of development. The scale of the buildings would also address the changes in levels coming down the hill at this end of Sheepcote Road and St Johns Road.

*Layout*

6.6.25 Through on going pre-application discussions, the layout of the buildings, amenity space and public access routes have been reconfigured in response to the feedback provided by the DRP panel. The extant permission (P/0586/15) provided for a public access route across the site from Sheepcote Road to St John Road. In earlier iterations of the proposal, it was intended to retain this public access route. However, following comments from the DRP panel, it was considered that the wider space between the western edge of the proposed community hall and St Johns Church would provide a more meaningful connectivity through the site as oppose to having a public route cutting in middle of the site. The proposals now before the Council show a public access on the western edge of the site and the previously provided access, in the centre of the site to be restricted for residents only. By providing a central private access route across the site has provided the opportunity to provide a more meaningful private amenity space for the future occupiers.

6.6.26 The applicant has also through pre-application discussions included some element of commercial floor space within the ground floor of the Block C fronting St John's Road. As noted under the principle section of this appraisal, Officers consider this as a positive move towards providing appropriate town centre uses to front out on to and integrate with the future Lyon Road square.

*Design and Appearance*

6.6.27 In terms of the appearance of the development, the proposal seeks to use a high quality brick finish to the building throughout. The proposed window reveals and recessed balconies would provide articulation to the façade of the building, helping the building to achieve its own identity in an area which is characterised by a varied pattern of development. The use of simple recessed modelling to the façade would add further articulation to the building's appearance and help delineate each of the apartments.

6.6.28 The proposed buildings have been designed to achieve an architectural cohesion with the proposed development on Lyon Road. The appearance would be modern and the palette of materials (which would be secured by condition) would seek to compliment the nearby buildings, but at the same time establish their own character in the urban environment. The palette of external materials would be controlled by way of an appropriate condition. Overall, it is considered that the modern design and appearance of the development would make a positive contribution to the wider urban environment.

### *Landscaping and the Public Realm*

- 6.6.29 The proposal is supported with an indicative landscape plan for the site. The scheme before the LPA has been subject to a number of pre-applications discussions and revisions prior to the agreement in principle over the final approach.
- 6.6.30 The principal route through the site would provide controlled public pedestrian access between Sheepcote Road and St John's Road, and would also form a plaza for the new community hall which would allow patrons of the hall additional outdoor amenity. With this in mind, the main plaza would be largely hard landscaped to provide a functional space and would be soften along the north-western boundary with ground level planting laid out in a geometric pattern to provide visual interest along this route. A raised planter with a low brick wall is proposed along the Sheepcote Road entrance to form a buffer from the highway.
- 6.6.31 The communal garden located within the centre of the site would provide one of the private gardens for the residents of the development. This area would be enclosed by the buildings on the site and would have a private pedestrian route between Sheepcote Road and St John's Road which would have a secure gated access. The main planting area around the perimeter of the buildings would in form of raised planters which would serve as dual purpose in creating a soft/ green landscaped corridor with low level shrub planting and to also provide a defensible area between the proposed public realm and the ground floor units. Ground level planting is proposed along the south-eastern boundary abutting No.5 St John's Road. The main central area would be laid to lawn to provide informal play area and would include some play elements.
- 6.6.32 Along the Sheepcote Road frontage, the two private terraces will be enclosed by raised brick planters with railings and gates to help separate the private area from the public. The remaining frontage would include a row of trees with defined band of paving beneath the trees to help create a perception of separation between the public pathway and the road and the approaches to the main entrances along this frontage.
- 6.6.33 St John's Road frontage would also include street trees set within grilles and hard landscaping. As this area would front out on to the future public square (secured through the Lyon Road redevelopment) and having regard to the need to activate this frontage through the provision of the commercial floorspace, the level of hard surfacing proposed along this frontage would be acceptable. This would ensure that the space in front of the commercial unit can be used flexibly as outdoor seating or spill out area to support the overall function of the future public square. In order to ensure that the materials used in this frontage of the development matches/ or compliments the palette of materials that would be used for the future public square, a bespoke condition is recommended to separate the specification of materials and layout of the hard landscape works for the frontage along St Johns Road to the rest of the landscaping works related to the development. Furthermore, contribution is also sought with regard to the future upgrade of the footpath that links the site

and the carriageway of St John's Road. This is to ensure that the public footpaths along this stretch are upgraded to relate to the future public square.

- 6.6.34 Given the site constraints and town centre location, it is considered that any form of landscape feature would enhance the development at this location, which at present has little or no formal landscaped areas. The proposal would also include an area of play courtyard adjacent to Block A and a green roof over the single storey element of the proposed community hall which would also create a visual landscaped feature within the development site.
- 6.6.35 The proposals have been extensively reviewed by the Council's Principal Landscape Architect, who supports the proposals subject to the following condition being imposed:

*Landscaping to be approved, including landscape masterplan, hard and soft landscape details and planting plans (at a scale not less than 1:100), written specification of planting and cultivation works to be undertaken and schedules of plants, noting species, plant sizes, plant container sizes (all at time of planting) and proposed numbers / densities and a landscape implementation programme.*

*Biodiverse roofs- green and brown roofs, hard and soft landscape details and planting plans where appropriate, with a written specification of the planting and the biodiverse roof detail make build up of the layers, including the substrate and schedules of plants, noting species, plant sizes or types (all at time of planting) and proposed numbers / densities.*

*Hard landscape material and boundary treatment details.*

*Landscaping Scheme - Implementation including a period of 5 year period for replacements of soft landscape*

*Levels: a detailed Levels Plan. This document is to explain details of the levels of the buildings, roads and footpaths in relation to the adjoining land and highway, and any other changes proposed in the levels of the site.*

*Details and specifications with respect to the play area and play equipment.*

*Landscape Management Plan and Landscape Maintenance, including long term design objectives, management responsibilities and maintenance schedules for all landscape areas. A long term Landscape Management Plan for the whole of the proposed development to ensure the future success of the development, including the long term aims and objectives for the Public Realm Management Plan.*

*Note: A management Plan may be expected to set out, graphically and / or in writing, the overall functional and aesthetic objectives of a landscape scheme and the steps (eg legal arrangements including ownership and management responsibilities, planned maintenance tasks, any phased works, monitoring procedures etc) that will be taken after implementation*

*to ensure that the scheme becomes successfully established and reaches maturity.*

*Landscape Maintenance over a 5 year period* – for each phase of the development

*Note: Maintenance refers to the routine physical tasks (eg mowing, pruning, weeding, watering, litter clearance, maintenance of furniture, play equipment etc) required to satisfy appropriate standards of aftercare and to enable the design and implementation objectives in respect of planting to be satisfactorily achieved. It is essential to identify who is responsible for these tasks. A Schedule of Maintenance Operations is normally a component of a Landscape Management Plan and commonly included within a Landscape Design Specification document.*

- 6.6.36 Subject to the imposition of the above suggested conditions, it is considered that the proposal would be in accordance with the policies stated above.

*Refuse and Servicing*

- 6.6.37 The proposed floor plans show that the following provision would be made in terms of refuse storage for the development:

Block A – 22 bins to serve the 75 flats contained within this block, located in a single refuse storage area.

Block B – 6 bins to serve the 24 flats within this block located within a single refuse storage area.

Block C – a total of 27 bins to serve the 105 units within this block, located within two separate refuse storage areas.

- 6.6.38 According to the Council's 'Code of Practice for the Storage and Collection of Refuse and Materials for Recycling in Domestic Properties (February 2016)', this type of development would incorporate the 'Two bin system'. A 1280 litre blue bin would be required for recyclable waste and an 1100 litre grey bin would be required for residual waste for every eight flats. Based on this Code of Practice, the development would require the following amount of bins to serve the size of development being proposed:

Block A – 10 x 1280 litre bins and 10 x 1100 litre bins = 20 bins in total.

Block B - 3 x 1280 litre bins and 3 x 1100 litre bins = 6 bins.

Block C – 14 x 1280 litre bins and 14 x 1100 litre bins = 28 bins in total.

- 6.6.39 Block A would see an over provision by two bins of the total number of bins required for this block. Block B would provide the correct amount and Block C would have an under provision by two bins.

- 6.6.40 According to the applicant's Design and Access Statement (DAS), the development has been designed to provide adequate storage for 1 No. 1100 litre bins for every four flats (equating to 51 bins according to the DAS). In addition to this, waste storage for the community hall would be provided at basement level and would have capacity to hold five bins (although it is noted that according to the Delivery and Servicing Plan the community hall currently only has one wheelie bin collection per week). The DAS also indicates that

the bins for the commercial unit would be located at the ground floor of Block C, although this is not clearly indicated on the proposed floor plans.

- 6.6.41 The applicant's calculations based on one 1100 litre bin for every four flats is not correct. Whilst it is noted that the total number of bins (55 in total) provided at ground floor level would meet the requirement of 54 bins as required under the Code of Practice for the scale of development being proposed, Block A would have an over provision of bins and Block C would have an under provision of bins required to serve each respective block. Furthermore, from the total number of bins proposed, only one bin would be provided for the commercial unit which would not be sufficient. It is also considered that the storage of commercial and residential waste should be separated to avoid any confusion by occupiers of the development and also having regard to the fact that commercial waste is not necessarily collected by the Council and could be collected by private operators.
- 6.6.42 In terms of layout and appearance of the refuse stores, these appear to broadly work. However there are some questions raised in respect to the required number of bins needed to serve both the residential and commercial elements of the development and the actual size of bins required for each specific stream of general waste and recycling materials. Whilst the dimension for the bins has not been provided by the applicant, measuring from the proposed plans, the bins appear to broadly meet the requirements for the large 1280 litre bin. Therefore the refuse stores would have adequate capacity to store the size of bins needed. However, the number of bins needed for Blocks A and C need to be amended to reflect the required numbers stated above and separate provision (including the correct number of bins) for the commercial unit needs to be made. Having looked at the proposed ground floor plans, it is considered that there is scope to make these changes without affecting the appearance of the building, other than the provision of an additional door to the first bin store in Block C to facilitate a separate store for the commercial unit. These elements can be adequately dealt with by condition.
- 6.6.43 The proposal also shows a designated holding area for the bins on collection day, which would be sited on the St John Road frontage. This will be managed by the dedicated caretaker for this site. Subject to the imposition of the suggested condition above, it is considered that the location and provision of refuse stores would be compliant with the above stated policies.

#### *Solar Panels*

- 6.6.44 The applicant is proposing to install solar panels on the roof of the proposed building. These are unlikely to be perceptible at street level as such panels would be set in from the roof edges and the applicant has shown a parapet detail to provide some additional screening. It is considered that the proposed solar panels would not have adverse impact upon the character of the area or the appearance of the completed development.

### *Conclusion*

6.6.45 In conclusion, the proposed development would provide a high quality development on the site which would appropriately address the public realm. The contemporary design of the buildings would add positively to the built form within the town centre, setting out a high quality contemporary design that other developments in the town centre will set as a standard. It is considered that the development proposal would be appropriate and would accord with the NPPF, policies 7.4.B and 7.6.B of the London Plan 2016, policy CS1.B of The Harrow Core Strategy 2012 and policies AAP1 and AAP4 of the Harrow and Wealdstone Area Action Plan 2013.

## 6.7 Residential Amenity

### 6.7.1 Residential Amenity of Future Occupiers

There are no specific policies within the AAP which deal with safeguarding residential amenity but it states that development proposals would be required to meet policy DM1 of the Development Management Policies Local Plan (2013), which seeks to ensure that “proposals that would be detrimental to the privacy and amenity of neighbouring occupiers, or that would fail to achieve satisfactory privacy and amenity for future occupiers of the development, will be resisted”. Policies DM27 relating to amenity space and DM28 children and young people’s play facilities are also applicable.

6.7.2 Policy 3.5C of The London Plan requires all new residential development to provide, amongst other things, accommodation which is adequate to meet people’s needs. In this regard, minimum gross internal areas (GIA) are required for different types of accommodation, and new residential accommodation should have a layout that provides a functional space. Table 3.3 of The London Plan specifies minimum GIAs for residential units and advises that these minimum sizes should be exceeded where possible. The policy also provides a commitment that the Mayor will issue guidance on implementation of the policy, and this commitment is fulfilled by the publication of the Mayor’s Housing SPG (2016). The SPG sets out detailed guidance on a range of matters relating to residential quality, incorporating the Secured by Design principles, and these form the basis for the assessment below. The use of these residential unit GIA’s as minima is also reiterated in Appendix 1 of the Residential Design Guide SPD. This is supported by policy AAP13 of the AAP.

### *Defining good places*

6.7.3 As stated above, the redevelopment of this site would contribute positively to the urban renewal of this part of the town centre by creating a distinctive, yet complementary group of buildings to reinforce the Lyon Road redevelopment currently underway and to support the wider regeneration of the area. The proposals would re-provide the community facilities on the site with a more modern and accessible form of development to enhance and support the wider community. An additional of a commercial unit on the St Johns Road frontage would also support the function of the future public square. The development would incorporate clear identified entrance points from Sheepcote Road and St Johns Road and creation of a new public plaza through the site. It would



also add to levels of natural surveillance of the immediate surroundings. It is therefore considered that the proposal would enhance the quality of this part of area in accordance with the principles of London Plan Policy 3.5.

#### *Communal and Public Open Space*

- 6.7.4 The proposal includes two private communal spaces for the residents of the development which would be afforded natural surveillance by the surrounding development, accessible for disabled people and wheelchair users. Both spaces are orientated in a way to optimise direct sunlight given the constraints of the site. Management of these spaces can be controlled by condition, through a landscape maintenance and management plan.
- 6.7.5 The public open space would be located to the north west boundary and would offer controlled public access, with access restricted during night-time. The route through would be accessible for all users. Due to the build form of Block C parts of the public space would not receive direct sunlight. However, as the space would primarily serve as a walk through and for certain times as a spill out area for the community hall, it is considered that the space would still provide adequate and functioning form of public space.
- 6.7.6 Overall it is considered that the different forms of communal space being offered would be a benefit of the scheme and improving the environment of these properties. The space would benefit from high levels of natural surveillance and would be of dimensions/configuration that would lend itself to domestic recreational activities.

#### *Play Space*

- 6.7.7 Local Plan Policy DM28 requires on site provision of facilities where a development would result in a net increase in child yield. Applying the child yields at Appendix 1 of Harrow's Planning Obligations SPD, it is calculated that the development would yield a total 90 children across all age ranges.
- 6.7.8 The Council's Planning Obligations SPD, informed by Harrow's PPG 17 Study, sets a quantitative standard of 4 square metres play space per child. When applied to the above child yield, this generates a requirement for 360sqm play space. The proposal would provide up to 349sqm, comprising of 233sqm of doorstep play located in the central section of the site and 116sqm of 5-11 play. There would be no on-site provision for 12 plus age group.
- 6.7.9 Whilst it is noted that the supported landscape report adopts the GLA's Play and Informal Recreation SPG (2012) benchmark to calculate the child yield and the resultant play space requirement. Officers consider that the Council's Planning Obligation SPD, provides a better analysis the local play space requirement and as such has applied this in assessing this application. Notwithstanding this, the overall play space provision would fall marginally below what would be required for the size of the development proposed.
- 6.7.10 It is considered that the remaining 11sqm play space for teenage (11-15 and 16-17) age groups would be better met by new or enhanced provision off-site. Therefore, to mitigate the requirement generated by the development in

respect of that age cohort, a contribution towards such off-site provision should be sought as part of the Planning Obligation. In accordance with the SPD formula the required contribution is a sum of £1,045. Officer's will discuss this requirement with the applicant and report the outcome via the addendum prior to the Committee meeting.

*Entrance and approach/ active frontages*

- 6.7.11 The Mayor's Housing SPG calls for entrances to be visible from the public realm and clearly defined. All three block would have main entrance points from the main street frontage and would be visible in the public realm and of suitable size. Each residential block would be served by a single core which also has lift access to/ from the proposed basement. The entrance to the private residential courtyard would be visible from Sheepcote frontage through the gap on the ground level between block A and B and from the frontage on St Johns Road. Likewise, the entrance to the public plaza would be clearly identifiable and would provide a public through access.
- 6.7.12 The main entrance to the community hall, along with the residential terraces located on the ground floor of Block C would activate the frontage along the public plaza and therefore affording natural surveillance over this public route.
- 6.7.13 The ground floor of each of the residential blocks would overlook the communal residential areas so that these areas are also activated. Overall it is considered that the proposal would provide active frontages along all publically accessible spaces which would ensure natural surveillance and activity.

*Shared circulation*

- 6.7.14 The SPG sets out a number of guidelines for shared circulation space, which includes the numbers units that are accessed from each core (eight units); the provision of entry phone, or audio-visual verification to the access control system where applicable; natural light and adequate ventilation where possible; in schemes with more than eight storeys the provision of two lifts; and in the case of those buildings with wheelchair units the provision of more than one lift.
- 6.7.15 Block A1 would be served by a single core which would have access to four lifts of which one would be wheelchair standard. However, from the first floor to the sixth floor, the core would serve ten dwellings, which would slightly exceed that recommended in the SPG. Whilst this is not ideal, the core itself would be adequately serviced and the block would be acceptable in terms of circulation in all other regards.
- 6.7.16 Blocks B and C would each be served by a single core that are serviced by two lifts each, whereby one lift is also wheelchair standard. The cores to these blocks would not serve more than eight dwellings per floor. Block C would also benefit from natural lighting on each floor through the windows located in the north-east elevations of this block.
- 6.7.17 In the absence of details submitted with the application, to accord with the SPG and to ensure the required high standard with regards to functionality, it

is therefore considered that an audio-visual entry system should be installed, or such other alternative access security measures as may be appropriate, in accordance with details to be agreed by condition.

*Dwelling space standards/ internal heights/ flexibility*

- 6.7.18 The minimum space standards are set out at Table 3.3 of the London Plan and are reproduced within the SPG.
- 6.7.19 Policy 3.8(c) of the London Plan relating to Housing Choice, requires 90% of homes should meet building regulations M4 (2) – ‘accessible and adopted dwellings’. Policy 3.8(d) will require 10% of new housing to meeting building regulations M4 (3) – ‘wheelchair user dwellings’. The accessibility requirement of the scheme is considered in detail elsewhere in this appraisal.
- 6.7.20 The proposed 1bed, 2bed and 3bed units are all shown to exceed the minimum space standards and the proposed studios would meet the minimum standards. The individual rooms within the flats are of good layout and size and suitable internal circulation space is provided in all units. In this respect the proposal is considered acceptable. The development would also achieve the minimum floor to ceiling height of 2.5 metres as required by the Housing SPG.
- 6.7.21 The SPG requires built in storage space to be provided in all new homes. The proposal is shown to provide an adequate level of storage space for each of the units. To ensure compliance with this standard, it is considered necessary to secure this as a condition of any planning permission.
- 6.7.22 The SPG also seeks adequate space and services to work from home. An indicative furniture layout is set out on the application drawings and this demonstrates that all of the flats would have space for a table. As such, each flat would have space flexible for dining and home study/work activities.

*Private open space*

- 6.7.23 The SPG requires a minimum of 5sqm per 1-2 person dwelling and an extra 1sqm for each additional occupant. Every flat would have a private balcony space or terrace which would meet the required standard recommended in the SPG. The SPG also calls for a minimum depth and width of 1.5 metres for all balconies and other private open spaces. The proposed balconies and roof terraces would comply with these minimum dimensions.
- 6.7.24 In addition to private balconies, residents would have access to private communal gardens, which is also consistent with the guidance contained in the Mayors SPG.

*Privacy*

- 6.7.25 The SPG calls for habitable rooms within dwellings to be provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces. Paragraph 2.3.36 of the SPG refers to yardstick separation distances of 18-21 metres between facing habitable room windows.

- 6.7.26 The starting point for the consideration of the subject proposal is that it is a town centre location and regard has to be given to the high density character and making effective use of this previously-developed site. Future occupiers choosing to live at the development are likely to have different expectations about the level of privacy afforded from such a development than those choosing to live in more traditional, suburban environments.
- 6.7.27 The layout of the units would in general ensure that the privacy of individual units would be maintained. With the exception of the balconies serving units C/1-5 to C/10-5 (Block C), all balconies would be recessed and in general, the return stepped element of these balconies would provide screening for these private amenity areas. The projecting balconies to units C/1-5 to C/10-5 would be sited in close proximity to adjacent bedroom windows and therefore could give rise to some overlooking. This could be either resolved by erecting a privacy screen on the flank side of the balconies nearest the neighbouring windows or alternatively moving the balconies further westward so that there is some distance maintained between the balconies and neighbouring windows. Such details can be conditioned. Where there are instances when two balconies adjoin, these would be provided with privacy screens to protect the privacy of the occupiers of each respective unit.
- 6.7.28 There are two top floor flats in Block A, units A/7-6 and A/7-7 that have flank secondary windows that serve the living/ kitchen areas to these units. These windows would have direct outlook over the roof terraces to the adjacent flats. As these windows are secondary, it is considered that these could be conditioned to be obscurely glazed to prevent any direct overlooking of the neighbouring roof terraces.
- 6.7.29 In terms of privacy between the blocks, a distance of at least 16m would be maintained between the rearmost corner of Block A and nearest corner of Block C and the buildings would be staggered. This relationship would still exhibit some degree of overlooking of the buildings in the western elevation to Block A and the southern elevation to Block C, however, the staggered layout of the development would in largely permit overlooking between each of the buildings at oblique angles only, and would not result in direct overlooking. In terms of the relationship between Block B and C which would have a more direct relationship, a distance of at least 21m to be maintained between the facing elevations.
- 6.7.30 It is noted that a number of the ground floor units within Block A and C would have ground floor terraces that either front the public plaza or the private residential route and communal gardens.
- 6.7.31 The ground floor units located on the north-west side of Block C would have terraces that are set at a higher ground level than the paved public route. This would provide some buffer between the public and private realm and would still provide a reasonable level of privacy to the occupiers of these units.
- 6.7.32 The ground floor units located on the south-east side of Block C would have terraces that front the private pedestrian route through the site. The proposed

landscaping plans show that raised planted would be directly placed in front of these terraces to provide a defensible buffer and provide some privacy to the occupiers of these units. Similar raised planters are also proposed along the perimeter of Block A (including the stepped element) to provide a privacy buffer between the terraces to the ground floor units and the communal gardens.

- 6.7.33 On balance, having regard to the high density nature of the proposal, which is consistent with the need to make effective use of this highly accessible edge of town centre site and recognising that those choosing to live in a high density development are likely to have different expectations about privacy, it is considered that the relationships between residential buildings would secure a standard of privacy that would be commensurately high for the vast majority of future occupiers.

*Dual Aspect*

- 6.7.34 The SPG seeks to avoid single aspect dwellings where: the dwelling is north facing (defined as being within 45 degrees of north); the dwelling would be exposed to harmful levels of external noise; or the dwelling would contain three or more bedrooms. The definition of a dual aspect dwelling is one with openable windows on two external walls, which may be opposite (i.e. front & back) or around a corner (i.e. front and side) and the SPG calls for developments to maximise the provision of dual aspect dwellings.

- 6.7.35 All of the units located within the corners of both building would be dual aspect. However it is noted that a large proportion of the units would be single aspect given the constraints of the site. Whilst the preference would be for dual aspect units, the proposed units would have south-east/ west and north-west/ east facing aspects and thereby each unit would receive adequate levels of natural daylight. It is considered that the single aspect nature of this development would be off-set by the good internal layout and circulation for each of the units.

*Noise*

- 6.7.36 The SPG seeks to limit the transmission of noise between flats, and from lifts/communal spaces to noise sensitive rooms, through careful attention to the layout of dwellings and the location of lifts. Local Plan Policy DM1 includes among its privacy and amenity considerations the adequacy of the internal layout in relation to the needs of future occupiers, and Harrow's Residential Design Guide SPD amplifies the point by advising that the vertical and horizontal arrangement of flats within a development should avoid conflicting room-use (i.e. bedroom vs. living/other room) relationships between flats.

- 6.7.37 In terms of internal noise transmission, the layout of the cores would ensure that noise sensitive rooms such as bedrooms are not sited adjacent to the lift shaft. Although, it is noted that the one of the four lifts within Block A would be sited adjacent to living/ kitchen areas of the adjoining units on all floors. As the living/ kitchen areas are considered to be areas where most noise/ domestic activities would be carried out within an apartment, it is considered that the

proposed layout would not have any unreasonable impact in terms of noise on the occupiers of these units.

- 6.7.38 Due to the Block configuration and the number of single aspect units, a number of flats would have bedrooms sited adjacent to living/ kitchen areas of adjoining flats. Whilst this is not ideal, in most cases due to site constraints, this is unavoidable. However, having regard to the fact the development would be a new build and therefore would be required to ensure that sufficient noise insulation is provided to meet Building Regulations. When considered against the requirement for thermal installation also, it is considered that sufficient level of noise mitigation would be achieved to provide a good level of accommodation for future occupiers.
- 6.7.39 The applicant has submitted a noise assessment report to determine whether any mitigation is necessary to achieve reasonable internal and external noise levels. The acoustic report assesses the acoustic performance of the proposed external building fabric and plant noise limits. Noise monitoring was undertaken between the 9<sup>th</sup> and 12<sup>th</sup> March 2015 and a total of three positions were measured as part of the survey (Sheepcote Road elevation, St Johns Road elevations and the car park). The results showed that the noise levels to the Sheepcote Road frontage are likely to be higher due to the busy trunk road. The survey indicates that in insulation of the adjoining traffic noise, the scheme is relatively quiet with the exception of the plant noise from the site and that from the adjoining sites. As such, the rear facades of each of the building are likely to experience relatively low noise levels.
- 6.7.40 In addition to the above assessment, the report notes that St John's Church holds concerts on alternative Thursdays commencing around 12.30pm and finishing 13.45pm. The nature of the concert will have amplified music. However, it assessment concludes that this does not give rise to particularly adverse noise impact on the future development. Given the frequency and time of this community event, it is considered that there would be no detrimental impact upon the future occupiers of this site.
- 6.7.41 The report recommends the targets to be achieved through the suitable construction of the building envelope, which include the type of glazing to be installed in the different façades of the development. A higher specification glazing is recommended for the windows facing Sheepcote Road, which includes acoustic lamination to the glazing panels. Internally, the development would utilise mechanical ventilation and heat recovery system throughout and therefore there will be no need for trickle ventilators or through-the-wall ventilators. The Council's Environmental Health Officer (EHO) is satisfied with the design criteria relating to the external fabric of the building.
- 6.7.42 The Council's EHO has also recommended a supplementary acoustic report be requested, requiring a BS 8233 assessment of noise exposure for any external amenity spaces provided for the residents' use, such as balconies, terraces, roof or other communal gardens. The assessment should include recommendations for mitigation to meet the level of 55dB LAeq.T where practicable. Where this is not practicable the report should specify what

mitigation is considered reasonable, with justification. However, Officers consider that given that the design of the balconies would be fixed at the application stage and having regard to the surrounding environment, being located on a busy road, it is unlikely that any significant noise reduction is likely to be achieved. Furthermore, in context of the urban location, it is to be expected that certain levels of noise would need to be endured by residents and external balconies would generally only be used for short period of times. Furthermore, Officers need to balance the need for some form of private external amenity areas, such as balconies and roof terraces to enhance the living standards for future occupiers. On this basis, it is considered that an imposition of such a condition would be onerous in this case.

- 6.7.43 With regard to the proposed mechanical plant for the building, the report recommends that the proposed plant (i.e. plant room louvers, car park ventilation fans, CHP/ Boiler flues) should not cumulatively exceed recommended noise levels when assessed at the nearest noise sensitive location. As the exact type of mechanical plant and machinery has not be specified, the Council's EHO has recommended a condition requiring all plant, machinery and equipment to be installed to meet the design parameters specified in the acoustic report. Also an acoustic verification survey to be carried out after machinery, plant and equipment are installed and operating to demonstrate compliance with such criteria.
- 6.7.44 In conclusion, subject to the imposition of appropriate planning conditions, it is considered that the impact of noise could be mitigated through the design of the buildings and employing appropriate installation of the mechanical plant. The impact of noise from the non-residential uses is discussed in detail below.

*Daylight and Sunlight*

- 6.7.45 The SPG (2016) states that *"All homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen and dining spaces should preferably receive direct sunlight"* (standard 32). Supporting paragraph 1.3.45 outlines that *"An appropriate degree of flexibility needs to be used when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties as well as within new developments themselves. Guidelines should be applied sensitively to higher development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and the scope for the character and form of an area to change over time."* Local Plan Policy DM1 includes among its amenity considerations the adequacy of light and outlook within buildings (habitable rooms and kitchens).
- 6.7.46 An assessment of potential impacts on sunlight, daylight and overshadowing has been undertaken and accompanies the application. The daylight and sunlight report is based on the Building Research Establishment's (BRE) 'Site Layout Planning for Daylight and Sunlight: A Good Practice Guide'. The assessment considers the impact on the site's residential neighbours, and on

the quality of sunlight and daylight to the new residential dwellings and open space. The methodology adopted is considered to be appropriate.

- 6.7.47 In respect of daylight/sunlight to amenity spaces, the report considers the percentage of area that will enjoy at least 2 hours of direct sunlight on the 21<sup>st</sup> March. The external amenity areas are split into two areas. Area A1 would be the public plaza located to the northwest of Blocks B and C. Area A2 is the communal private gardens located centrally within the site and to the south of Block A. In respect of Area A1, the results show that 95% of the garden area would enjoy at least 2 hours of direct sunlight. However, only 31% of the area A1 would receive 2 hours of sunlight on 21<sup>st</sup> March, which is below the 50% recommended under the BRE guidelines. The lower level of adherence to area A1 is due to the built up nature of the scheme massing. It is also worthy to note that the results show that the areas that receive less than the 2 hours are predominately hard landscaped areas. Furthermore area A1 serve mainly to private a route through the site and would only occasionally be used as a spill out area for the community hall. The proposal is therefore considered to be acceptable in this regard.
- 6.7.48 For the purposes of measuring the performance of habitable rooms within the proposed development, the assessment uses the Average Daylight Factor. This method measures how much sky can be seen from the window and converts the results into a percentage of annual probable sunlight hours received. The assessment notes that, for sunlight assessment, only the main window of each room within 90 degrees of due south need to be tested. The BRE guidelines recommend that ADF values of 1% should be achieved in bedrooms, 1.5% in living rooms and 2 % in kitchens. The report highlights that as a number of the living/ kitchen/ dining rooms have the kitchen area at the back of the room, which would be less well daylight, the kitchen has been excluded from the assessment. The report also acknowledges that the provision of balconies be it projecting or recessed will also have some impact upon the amount of daylight received to the habitable room. However this needs to be balanced against the need to provide private amenity space which is seen as the trade-off in this instance.
- 6.7.49 A selection of habitable rooms within Blocks A, B and C at ground, first, third and fifth floor levels were tested. In all 209 rooms were tested of which 74 rooms were living/ dining rooms, 4 studios and 131 bedrooms. The ADF results show that 186 of the 209 rooms tested (89%) would achieve or exceed the recommended ADF targets.
- 6.7.50 The results of the analysis demonstrate that the majority of habitable rooms will achieve the recommended level of daylight. However, officers also note that some rooms would only have ADF levels of less than 1% and as such there will be a number of apartments within the scheme which are inadequately lit and will receive poor daylight. It is highly likely therefore that some flats will require supplementary electric lighting particularly in the winter months. Despite this, it is also acknowledged the provision of balconies does provide a trade-off between providing easily accessible external amenity space and inevitable shading of windows below/ or recessed.



6.7.51 In conclusion, officers consider that whilst clearly it is desirable for a new development to achieve 100% compliance with the recommendations of the BRE guidelines, it is inevitable that a site of the proposed density will require consideration of some compromise between daylight/sunlight, the provision of highly valued residential amenity space (balconies) and other planning considerations that may influence the site layout and orientation of buildings. It should also be emphasised here that the recommended BRE guidelines for daylight and sunlight – whilst a valuable tool for measuring the degree of daylight and sunlight that would be achieved – do not form a part of the adopted development plan. Rather, Local Plan Policy DM1 requires a high standard of amenity and undertakes to have regard to a range of amenity considerations which includes, but is not limited to, the adequacy of light and outlook. Thus, while more than is desirable of the tested rooms/windows would not achieve the recommended BRE standards, across the development as a whole, it is demonstrated that the majority would. Furthermore, the majority of flats would benefit from a dual aspect, and all flats would meet or exceed the London Plan minimum space standards, and have access to private amenity space. On balance, therefore, it is considered that the poor performance of some parts of the development in terms of the recommended BRE guidelines is not unacceptable.

*Amenity Impacts of the Proposed flexible A1, A2, A3, B1, D1 and D2 uses*

6.7.52 Local Plan Policies AAP 18 and DM41 include criteria requiring the consideration of impacts of uses proposed upon neighbouring residential occupiers. Policy DM1 *Achieving a High Standard of Development* requires consideration of the amenity impact of a proposed use/activity in terms noise (including hours of operation), vibration, dust, air quality and light pollution.

6.7.53 Notably, a number of residential units will be situated above the proposed community hall located within the ground floor of Block B and the commercial space located within the ground floor of Block C. It is considered that the proposed flexible uses within the buildings, including D1 and A3 uses, could give rise to some potential noise conflict for the occupiers of the flats above and adjacent. The proposal have been reviewed by the Council's EHO who has confirmed that whilst there is no issue in principle to the proposed uses in the locations specified, there will be a requirement for certain conditions to be imposed to ensure that the amenity of the future occupiers is safeguarded in respect of noise and disturbance. This would be both in terms of the noise generated by the types of uses being proposed as well as any mechanical plant required associated with those uses.

6.7.54 The EHO has also requested that a management plan for events at the community hall to be agreed with the Council. This would include, but not be limited to, hours of operation, management and staffing, types of event, control of internal sound levels, management of ingress and egress of patrons etc. Whilst it is noted that the community hall already exists on this site, the hall is currently flanked on both side by non-residential uses. Although noted that there are four houses located to the rear of the hall which are in the ownership of the trustees of the community hall. The proposal would now form part of a

largely residential led development and would also include an external area that can also be used by the patrons of the community hall. As such, the imposition of a condition requiring a management plan would not be deemed unreasonable in this case. A condition is also recommended (based on EHO comments) for details of the measures to be incorporated within the design of the buildings to minimise excessive noise breakout from the proposed community hall and the commercial floorspace, which should include details any mechanical ventilation that would be required to achieve such mitigations.

- 6.7.55 It is also considered necessary to control the hours of use of the ground floor commercial premises as a condition of any planning permission.

In conclusion, subject to the imposition of appropriate planning conditions, it is considered that the impact of noise could be mitigated through the design of the buildings, by controlling hours of operation and use of external space for the commercial/community element and by limiting noise levels of any future mechanical plant.

*Impact of Development on Neighbouring Occupiers*

- 6.7.56 London Plan Policy 7.6 *Architecture* states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings in relation to privacy, overshadowing, wind and microclimate.

- 6.7.57 Core Strategy Policy CS1 B requires development to respond positively to the local context in terms of design, siting, density and spacing. Policy DM1 requires all development to achieve a high standard of privacy and amenity, and sets out a number of criteria for the consideration of the same. The Council's Residential Design Guide supplementary planning document is also relevant.

*Daylight and Sunlight*

- 6.7.58 The applicant has submitted a sunlight and daylight assessment which has assessed the potential impact of the proposed development upon the adjoining buildings. The following buildings were assessed:

St John the Baptist Church  
Kensington Heights  
Nightingale Court  
St John's Court  
Platinum House  
276-282 Station Road  
10-20 Manor Parade

- 6.7.59 In order to establish whether the proposals will have a significant effect on the daylight enjoyed by neighbouring properties, a Vertical Sky Component analysis (VSC) has been undertaken. BRE guidelines seek for each window to achieve a VSC of 27% or 0.8 times the existing.

- 6.7.60 With regard to daylight, the BRE Guidelines also set out numerical values for Daylight Distribution and seeks to ensure that a significant portion, which is

considered to mean at least 0.8 times the existing area of each habitable room, lies in front of the No Sky Line (NSL).

- 6.7.61 In assessing the sunlight to existing buildings BRE guidelines recommends an assessment in the case of new development would be situated within 90° of due south of a main window wall of an existing building and the section drawn perpendicular to the existing window wall, the new development would subtend an angle greater than 25° to the horizontal measured from the centre of the lowest window. Sunlighting to an existing window can be considered to be adversely affected if it receives less than 25% of annual probable sunlight hours (APSH), or less than 5% of annual probable sunlight hours between 21 September and 21 March, receives less than 0.8 times its former sunlight hours during either period and has a reduction in sunlight received over the whole year greater than 4% of the ASPH.
- 6.7.62 In assessing the impact on the Church, it is noted that the windows in the south east elevation of the Church would not be afforded the same level of protection as windows that service a residential premises. However, the sunlight and daylight assessment can be a useful tool to assess development impact upon adjoining buildings in terms of scale, massing and dominance. In assessing the Vertical Sky Component (VSC, the results show that 64% of the windows tested would continue to receive adequate daylight, or by retaining at least 0.8 times its former value, i.e. a reduction in 20% reduction. However, the windows located in the southern most corner of the Church would experience some loss of VSC greater than 20%, the lowest being 0.51. Having regard to the fact that the windows to the Church serve non-habitable areas and given the separation distance between the Church and the proposed development, it is considered that the impact would not be adverse. In addition, the results show that majority of the window would adequate levels of daylight. In terms of ASPH, 75% of the windows tested would adhere to the BRE guidelines criteria note above.
- 6.7.63 Kensington Heights is located on the opposite side of Sheepcote Road and to the east of Blocks A and B. The development would maintain a separation distance of at least 26m from Kensington Heights and the sunlight and daylight assessment shows that 92% of the windows tested facing the development site would still retain a VSC of at least 0.8 times its former value. In terms of daylight distribution of the habitable rooms tested, 94% would continue to enjoy good levels of daylight distribution. In terms of ASPH, 100% of the windows tested would adhere to the BRE guidelines criteria. In this regard, the proposed development would have no detrimental impact upon the residential amenities of the occupiers of this building in terms of loss of light, privacy or outlook. It is noted that the increase in the height and scale of built form would be perceptible from this building, however, the distance retained would off-set any perceived impact.
- 6.7.64 In assessing the impact upon the neighbouring building Nightingale Court which is located to the south of Block A, a minimum distance of at least 21m would be maintained between the flank elevation of the proposed Block A and the facing flank wall of Nightingale Court. The VSC results show that 79% of

the windows tested would adhere to the BRE guideline targets. The remaining 21% that do not adhere would experience ratio reductions between 0.72 and 0.78, which are only marginally below the 0.8 recommended guidelines. The proposal does show a number of habitable room windows and balconies that would face Nightingale Court. However, given that these windows and external balconies would effectively overlook what as communal garden and parking area serving Nightingale Court and taking into consideration the distances retained to the common boundary it is considered that the proposal would not give rise to any unacceptable loss of privacy.

- 6.7.65 In assessing, the impact of Block C on the Nos.276 to 284 Station Road, this block predominantly comprises commercial uses at ground, first and second floor levels, with the exception of No. 276 Station Road which comprises 2 flats located on the first and second floors. The rear elevation of Nos.276 to 284 comprises a number of windows that serve the commercial premises and the two flats located at No.276. Majority of the windows serving the commercial premise are obscure glazed and therefore for the purposes of the Council's guidelines these windows would not be considered protected. It is however noted that the report appears to refer to the windows to Nos.278 to 284 as serving residential unit. A site visit has established this not to be the case and therefore the data for these windows has not been given significant weight. The only habitable windows that are affected would be to No.276 Station Road. The results show that the VSC level and the daylight distribution levels will be below the recommended guidelines (VSC – 0.37 and 0.40 respectively). Whilst this is not ideal, and the fact that Block C would be sited to the south of this neighbouring building would give rise to some level of impact upon these windows, it is considered that the proposal would not give rise to an unreasonable level of impact to these windows to warrant a refusal on such basis. This is aided by the fact that the windows serve bedrooms which are considered to be areas that are primarily only used for sleeping and therefore are not likely to be used for great extent of times during the daytime as it would be in the case for a living room.
- 6.7.66 In terms of loss of outlook and privacy, Block C would be sited a minimum distance of at least 18m from the rear elevation of No.276 Station Road. It is inevitable that in built up areas that there would be some mutual overlooking between buildings. However, it is considered that the distance of 18m would still provide some separation between the existing and proposed buildings.
- 6.7.67 In assessing the impact upon Platinum House, the report demonstrates that 88% of the windows tested would adhere to the BRE guidelines by continuing to achieve at least 27% VSC or by retaining at least 0.8 times its former value. The remaining 12% that do not adhere would experience ratio reductions between 0.71 and 0.79, which are only marginally below the 0.8 recommended guidelines. In terms of daylight distribution and APSH, of the windows tested respectively, all would receive good levels of daylight distribution and sunlight. Block C would retain a distance of at least 38m. Given this distance, it is considered that the proposed development would not give rise to any unreasonable impact upon the occupiers of Platinum House in terms of loss of outlook, light and privacy.

- 6.7.68 It is noted that the report does not include an assessment on the impact upon the neighbouring library or the office building known as 'Bank House'. As the rear facing windows to the library and Bank House would not be given the same level of protection as in the case of a residential building and therefore there are no policy grounds to warrant a refusal on the grounds of the impact to these windows. Notwithstanding this, Block C would be sited to the north of the library and Bank House. Block A would maintain a distance of at least 16.5m. There will be some level of mutual overlooking between the buildings. However as noted above in a built up/ urban environment, this is to be expected given the close proximity of building and high density environment.
- 6.7.69 In terms of the impact on St Johns Court, Block A would be located to the north-east of this site and therefore the proposal would have no impact in terms of loss of light or outlook. The VSC results should that 100% of the windows tested would adhere to the BRE guidelines. Overlooking between both sites would be at an oblique angle and therefore there would be no unreasonable impact in this regard. Block C would be largely screened by the library and Bank House.
- 6.7.70 In terms of 10-20 Manor Parade, Station Road, Blocks A and B would be sited to the southwest of this site. The VSC results show that 100% of the windows tested would adhere to the BRE guidelines. Likewise, from the windows tested, the daylight distribution and APSH also show 100% adherence. Given that the development site would maintain a distance of at 24m (taken from the northern corner of the application site to the south west corner of Manor Parade) there would be no unreasonable impact on this neighbouring site in terms of loss of outlook, privacy or light.
- 6.7.71 In conclusion, the proposed development whilst would introduce a high density form of development within close proximity to existing building, it has been demonstrated that the proposal would not give rise to an unacceptable level of harm to any residential amenities of neighbouring site so as to warrant a refusal on such grounds. It is considered that the proposal would give rise to no conflict with the development plan policies stated above.

## 6.8 Traffic, Safety and Parking

- 6.8.1 The NPPF sets out the overarching planning policies on the delivery of sustainable development through the planning system. It emphasises the importance of reducing the need to travel, and encouraging public transport provision to secure new sustainable patterns of transport use.
- 6.8.2 The London Plan Policies 6.3, 6.9 and 6.13 seek to regulate parking in order to minimise additional car travel, reduce trip lengths and encourage use of other, more sustainable means of travel. The Parking Addendum to Chapter 6 of The London Plan sets out maximum parking standards for new development dependent upon their use and level of public transport accessibility. It is noted that at supporting paragraph 6A.3A to the Parking Addendum sets out that there is scope for greater flexibility to the parking

standards in different parts of London having regard to patterns of car ownership and use, levels of public transport accessibility, the need for integrated approaches to on-site and off-street parking, efficiency in land use and overall impact upon environment and the transport network.

- 6.8.3 Policy AAP 19 of the AAP seeks to limit on site car parking and development proposals to support the use of sustainable modes of transport, in particular in areas that have a high level of public transport accessibility. Policy AAP 20 (Harrow and Wealdstone Green Travel Plan) seeks to ensure that all major developments produce a site specific travel plan to demonstrate how the development would meet the wide Green Travel Plan provisions.
- 6.8.4 The application site is located within Harrow Metropolitan Centre, which has the highest PTAL rating (6a). The maximum parking standard from a Central Zone would be up to one space per unit. The applicant has provided a transport assessment (TA) in support of their proposal, which concludes that the proposal would give rise to no highway or transportation reasons to object to the proposal. The TA *inter alia* includes an assessment of the existing nodes of transpiration, the existing and proposed uses and the associated trip generation associated with both uses, the impact of construction traffic, servicing, deliveries, pedestrian routes and cycling. The applicant has also submitted an initial Travel Plan to support the development, which sets a list of objectives and targets, and sets out the measures that will be introduced in order to meet these.
- 6.8.5 The subject site is located within a control parking zone operating from Mondays to Saturdays 8.30am to 6.30pm. The proposal would provide a total of 53 spaces, of which 7 spaces would be accessible bays. This equates to 0.43 of a parking space per unit. It is noted that the TA makes reference to the development being car free, which appears to be an error. In general, within town centre location that have a high level of accessibility to public transport, a car free development would be highly supported and the above policies are geared towards promoting this approach and towards reducing on-site parking provision in such a central location and the desire of achieving a model shift away from private car ownership. Notwithstanding this, the level of parking proposed would not exceed the maximum parking standards set out in the London Plan.
- 6.8.6 The TA notes that the existing level of on-site parking for the hotel to be at 55 spaces (surface parking), and for Victoria Hall 22 spaces at surface level. The proposal would see a total provision of 85 parking spaces all located within the basement car park, of which 63 spaces would be allocated for residential use and 22 spaces would be dedicated for the use of the community hall only. The parking ratio for the residential element would be 0.3, which is slightly lower than that approved in the extant permission. Future occupiers however would need to be excluded from applying to the local CPZ, and not simply restricted as indicated on page 3 of the TA, paragraph 1. This can be secured via the section 106 agreement. The proposal does not seek to include any car parking space for the commercial unit. This would be acceptable given the town centre location.

- 6.8.7 24% of the 84 car parking spaces are to be for blue badge holder, 20% spaces would have electric charging points installed and a further 20% would be passive to meet London Plan requirement.
- 6.8.9 The applicant has shown the provision of secure cycle storage for the occupiers of the site in line with the requirements set out in the London Plan, achieving at least two cycle parking spaces per unit. It is envisaged that this level of provision would encourage residents to use an alternative mode of travel to the private car. In addition, it is proposed to provide 2 short stay cycle parking spaces for the commercial unit, which would be located along the St Johns Road frontage. Sufficient long and short stay cycle parking for the community hall would be provided within the basement car park and additional public parking would be provided on the public realm.
- 6.8.10 Refuse collection and servicing for both the residential and non-residential parts of the development would take place from St Johns Road to ensure that there is no impact on the free flow of traffic along Sheepcote Road. However, as noted above the proposed ground floor plan appears to show that the refuse holding area would block the footway on St Johns Road. As such, a condition would be required to ensure that these are sited within the site boundary to ensure no impedance of the adjacent footway.
- 6.8.11 The proposal would see the existing northern most vehicular access point on St John Road to be closed. The existing vehicular access on Sheepcote Road would also be closed and a new wider vehicular access is proposed to the southern end, which would permit access to and exit from the basement car park in a forward gear.
- 6.8.12 The proposed lay-by on Sheepcote Road is shown off Highway, therefore a traffic order is not required and the site management can control who uses the space. Details (materials and dimensions) of the proposed changes to the highway layout associated with the layby and revised crossovers on Sheepcote Road would be required and be secured by condition.
- 6.8.13 The TA noted that a Construction Logistic Plan will be required to ensure that the construction traffic to the site and storage of materials does not adversely impact upon the free flow of traffic along sheepcote Road.
- 6.8.14 The Council's highway authority have stated that the usage of car parking for guests, ceremony vehicles and potentially coaches must be catered for, a more detailed split of the car park between the residents and the public facility needs to be provided. However, Officers consider that the number of space to be re-provided for the community hall would be the same level as existing and given the town centre location, which has paid parking facilities nearby, the usage of car parking for the hall as shown, is reasonable.
- 6.8.15 The Council's highway authority has advised that the provision for motorised two wheelers, motorcycles and scooters must be specified, the current proposal of cycle parking as bicycle and non-motorised two-wheelers needs to

be retained. Also, some of the ground floor bicycle parking must be accessible to the general public. The current proposal seems to present enclosed bike stores only. The access of cyclists to basement car parks must be specified, a safe and practical access as well as circulation of cyclists in the car park basement must be demonstrated. In terms of motorcycle provision, the basement plan does show an area within the basement where motorcycle parking is to be provided. However it is not clear on the number of spaces that are provided. Policy DM42 of the DMP requires the provision of one motorcycle space for every 20 car parking spaces. Accordingly, this development would be required to be provide 5 motorcycle spaces, which can be secured by condition.

6.8.16 The Council's Highways Authority are satisfied with the level of parking being proposed and welcome the level of cycle parking being provided. The Council's Travel Plan Coordinator (TPC) has reviewed the submitted Travel Plan and the objectives and targets contained within. The TPC has recommended a number of changes to the Travel Plan and has recommended that the monitoring of this to be secured through a section 106 obligation. In addition to this, recommendation has been made to impose financial penalties should the target agreed in the travel plan not be met within the monitoring period. Accordingly Officers consider that this could be secured under the section 106 agreement.

6.8.17 In conclusion, it is considered that the proposed development, subject to the imposition of appropriate conditions and/ or section 106 obligations would have no adverse impact up parking or highway safety and consequently would give rise to no conflict with the above stated policies. TfL have provided an initial response with regard to the scheme, for which the applicant has provided a response. The final comments from TfL shall be reported by addendum.

## 6.9 Development and Flood Risk

6.9.1 London Plan Policy 5.12 *Flood Risk Management* states that development proposals must have regard to measures proposed in Catchment Flood Management Plans.

6.9.2 Core Strategy Policy CS1 U undertakes to manage development to achieve an overall reduction in flood risk and increased resilience to flood events. Policy AAP9 of the AAP calls for major development to: reduce surface water run-off; utilise sustainable drainage systems; ensure adequate arrangements for management and maintenance of on-site infrastructure; use appropriate measures to prevent water pollution; and where appropriate, demonstrate that the proposal would be resistant and resilient to flooding from all sources.

6.9.3 London Plan Policy 5.13 states that development should utilise sustainable urban drainage systems (SUDS) and should aim to achieve greenfield run-off rates and this objective is reiterated in Policy AAP9. Policy 5.13 of the London Plan sets out a drainage hierarchy to manage surface water run-off as close to its source as possible.



6.9.4 A small portion of the site it is within Zone FZ3a - risk of flooding from surface water. This proposal is supported with a Drainage Report and FRA, and an initial drainage layout/design. The drainage strategy confirms that the discharge rate of the proposed development would be 5 litres per second, achieved through on-site attenuation storage which would be in two separate underground storage tanks. The Council's Drainage Team has advised that 5 litres per second is acceptable as the appropriate greenfield run-off rate for the site. It is considered that the proposed run-off rate may be secured as a condition of any planning permission. Notwithstanding this, the Council's Drainage Team has also advised that the detail drainage design be secured by condition. In this regard, and subject to the imposition of suitable conditions, the proposal would give rise to no conflict with the above stated policies.

#### 6.10 Accessibility

6.10.1 Policy AAP4 of the AAP, policy DM2 of the DMP and policy 3.8(c) of the London Plan relating to Housing Choice, requires 90% of homes should meet building regulations M4 (2) – 'accessible and adopted dwellings'. Policy 3.8(d) will require 10% of new housing to meeting building regulations M4 (3) – 'wheelchair user dwellings'. Furthermore, The London Plan policy 7.2 requires all future development to meet the highest standards of accessibility and inclusion.

6.10.2 The Design and Access Statement and the submitted plans demonstrate that at a minimum all homes would meet Part M4(2) of the Building Regulations and at least 10% of the homes would be wheelchair adaptable to meet the requirements of Part M4(3). The applicant has stated that the affordable rented wheelchair units would be fully fitted for wheelchair user.

6.10.3 On this basis, the proposed development will give rise to no conflict with the above stated policies.

#### 6.11 Sustainability

6.11.1 Policy 5.1 of The London Plan (2016) seeks to achieve an overall reduction in London's carbon dioxide emissions of 60 per cent by 2025. For 'major' developments (i.e. 10 or more dwellings), policy 5.2A/B of The London Plan sets out the 'lean, clean, green' approach to sustainability, which is expanded in London Plan policies 5.3A, 5.7B, 5.9B/C, 5.10C and 5.11A. The London Plan carbon dioxide reduction target for residential buildings during the period 2016-2019 is to achieve zero carbon. If zero carbon cannot be delivered on site, then any short would need to be offset through cash in lieu

6.11.2 In respect of the non-domestic building, London Plan policy 5.2 requires development for the period of 2016-2019 to achieve as per what is required under building regulations.

- 6.11.3 Core Policy CS1.T and policy AAP4 of the AAP requires development proposals to incorporate sustainable building design and layout.
- 6.11.4 The applicant has submitted a Sustainability and Energy Report. The energy report sets out the following reductions could be achieved for the site:  
**Domestic** - 46.43% overall reduction in regulated CO<sub>2</sub> emissions, from the combined energy hierarchy.  
**Non – Domestic** – 15.06% overall reduction in CO<sub>2</sub> emissions from the combined energy hierarchy.  
**Combined Domestic and Non-Domestic** - 45.05% overall site wide reduction in CO<sub>2</sub> emissions.
- 6.11.5 The Energy Strategy sets out the following approaches to be taken to achieve the London Plan CO<sub>2</sub> target reduction:
- “Be Lean” – construct the buildings to a high thermal performance with U-values exceeding minimum Building Regulations targets. .
- “Be Clean” – installation of gas powered community heating and hot water. Be clean would typically be associated with Combined Heat and Power (CHP). It is proposed to incorporate a gas community CHP system powering the residential units, the retail and community hall.
- 6.11.6 “Be Green” – installation of photovoltaic (PV) solar panels to the flat roofs. Having assessed various different forms of renewable technology, the Energy Strategy concludes that PV solar panels as the most appropriate form of renewable technology for this development.
- 6.11.7 Whilst a detailed design will be necessary to demonstrate that the proposed development will achieve the overall CO<sub>2</sub> reduction, it is anticipated that through the above measures the proposal will achieve an overall CO<sub>2</sub> reduction of 45.05%. In terms of carbon offset, it is estimate that 125.5 tonnes of residential CO<sub>2</sub> emissions would need to be offset through of site contributions. This is estimated at £225,900. The final offset contribution would be determined after a completed SAP certificate has been provided. The mechanism to secure this would be through the section 106 agreement.
- 6.11.8 Policy 5.11 of the London Plan seeks Major development proposals to be designed to include roof, wall and site planting, especially green roofs and walls where feasible. The proposal would include green roofs to the building to meet the aspirations of this policy.
- 6.11.9 In conclusion, the development would accord with development plan policies. To ensure compliance with these standards, a condition is attached requiring a post occupation assessment of energy ratings, demonstrating compliance with the submitted energy report.
- 6.12 Air Quality

- 6.12.1 Policy 7.14B of the London Plan seeks to minimise exposure to existing poor air quality and make provision to address local problem of air quality. It goes onto stated *inter alia* measures to reduce emissions during demolition and construction; proposals to be ‘air quality neutral’ and not to lead to further deterioration in air quality; ensure on-site provision of measures to reduce emissions; and assessment of the air quality implications of biomass boilers. Policy DM1 (D.h) of the DMP also reinforces the view of assessing the impact of proposal on *inter alia* vibration, duct and air quality.
- 6.12.2 A comprehensive air quality assessment has been carried out covering all the issues. The Council’s Environmental Health Officer (EHO) is satisfied with this assessment. Assessments have been carried out for impact of the new development on local air quality, the effects of existing local air quality on residents of the proposed dwellings, in relation to the Mayor’s Air Quality Neutral policy, and in respect of the Mayor’s SPG on air quality and dust from construction sites.
- 6.12.3 All the assessments indicate there will be no significant impacts, except the construction assessment shows that, without suitable mitigation, the risk will be significant. However, with mitigation the risk will be reduced to an acceptable level. The Council’s EHO has recommended that mitigation methods and monitoring arrangements should be detailed in an “Air Quality and Dust Management Plan” which should be submitted to and agreed with the local planning authority before works start. Accordingly, a planning condition should be imposed requiring this.
- 6.12.4 In addition, as the exact types of CHP and plant has not yet been specified, the report recommends suitable emission levels for whatever plant is installed. The Council’s EHO has recommended a condition be imposed requiring a report detailing the exact plant to be installed, and demonstrating it meets the required standards set in the air quality assessment, to be submitted to and agreed by the local planning authority before the development commences.
- 6.12.5 Subject to the imposition of the recommendation conditions, the proposed development would give rise to no conflict with the above stated policies.
- 6.13 Environmental Impact Assessment (EIA)
- 6.13.1 The application has been screened under the Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 (as amended) and whilst the development would exceed the applicable threshold, it is considered that the development does not constitute Environmental Impact Assessment (EIA) Development as the development would have relatively low impact on the wider environment.
- 6.14 Statement of Community Involvement
- 6.14.1 The NPPF, Localism Act and the Council’s Statement of Community Involvement encourage developers, in the cause of major applications such as

this to undertake public consultation exercise prior to submission of a formal application.

- 6.14.2 Prior to the submission of this application, the applicant did hold Public Information Event. The applicant had sent out leaflets of invitation to local residents that residing close to the site. The applicant also advertised the public event in the local newspaper.
- 6.14.3 The Council also sent out letters of consultation to local residents in the surrounding area inviting them to make representations on the proposed development.
- 6.14.4 The applicant has sought to encourage public consultation in respect the proposal in line with the guidance set out in the NPPF and the Localism Act.

#### 6.15 Planning Obligations

- 6.15.1 The heads of terms of the section 106 agreement have been set out above. These are considered necessary to make the application acceptable, in accordance with policy 3.2 of The London Plan 2016 and policies CS1.Z/AA and CS2.Q of the Harrow Core Strategy 2012.
- 6.15.1 In respect of the contributions sought by the TfL in regard to a Step Free Access (£25,000). The LPA considers that the cost of such improvement works would be through CIL and TFL would have to bid through the normal way for funding for this as oppose to seeking s.106 contributions. The LPA does not think that this meets the necessary tests. As such, this term can be removed.

#### 6.16 Impacts on Trees and Biodiversity

- 6.16.1 The applicant has submitted a Preliminary Ecological Assessment (PEA) which has been reviewed by the Council's biodiversity Officer who has stated that the PEA provides a partial, incomplete assessment of the biodiversity on site. Whilst it may have followed B.S. 42020:2013 it does not meet the standard for an urban survey that we should be expecting.
- 6.16.2 That said it is clear that the site is of generally low value and if the design could be enhanced and the right conditions attached to any permission then the development should result in positive gain for biodiversity. Given that the site is located within an area where urban greening is much needed, we should seek to secure as much as practicable. There are few opportunities to do so otherwise. Accordingly, the Biodiversity Officer has recommended a number of conditions that should be imposed to ensure that the development undertakes the relevant surveys and incorporates appropriate ecological enhancement on site. Subject to these conditions, it is considered that the development would be acceptable in this regard.
- 6.16.3 With regards to trees, the applicant has submitted a tree impact survey. Officers are seeking clarification from the Tree Officer to confirm if the

information submitted is satisfactory. The outcome of which would be reported back by addendum.

## **7.0 CONCLUSION AND REASONS FOR APPROVAL**

- 7.1 The proposed redevelopment of the site would provide a high quality residential development which would be a positive contribution to the town centre environment. The site is currently occupied by a dated hotel and community hall which is characterised by a varied configuration of built forms depicting the era that they were constructed. The loss of the hotel itself, given its size, is afforded no protection in the adopted development plan. The redevelopment of the site would enhance the urban environment in terms of material presence, attractive streetscape, and good routes, access and makes a positive contribution to the local area, in terms of quality and character.
- 7.2 The proposed would secure the provision of onsite affordable housing at a level that meets the minimum affordable housing target set out in the development plan. Overall, the number of units proposed would positively add to the Council's housing delivery targets. The proposal would also see the re-provision of the community hall.
- 7.3 The proposed redevelopment of the site would result in a modern, contemporary design that responds positively to the local context, and would provide appropriate living conditions which would be accessible for all future occupiers of the development.
- 7.4 The layout and orientation of the buildings and separation distance to neighbouring properties is considered to be satisfactory to protect the amenities of the neighbouring occupiers and the development would contribute towards the strategic objectives of reducing the carbon emissions of the borough.
- 7.5 The decision to grant planning permission has been taken having regard to the National Planning Policy Framework 2012, the policies and proposals in The London Plan (2016), the Harrow Core Strategy 2012, the Harrow and Wealdstone Area Action Plan 2013 and the Development Management Policies Local Plan 2013, and to all relevant material considerations, and any comments received in response to publicity and consultation.

## **APPENDIX 1: Conditions and Informatives**

### **Conditions**

To be reported via the addendum

## **APPENDIX 2: SITE PLAN**

Site Location Plan



# APPENDIX 3: PLANS AND ELEVATIONS



Proposed Basement Plan



Proposed Ground Floor Plan





**PROPOSAL SUMMARY**  
 The proposed development consists of a new 10-storey residential building (Block A) and a new 5-storey residential building (Block B) located on the site of the former Cumberland Hotel and Victoria Hall. The development is proposed to be built on the site of the former Cumberland Hotel and Victoria Hall, which is a Grade II listed building. The development is proposed to be built on the site of the former Cumberland Hotel and Victoria Hall, which is a Grade II listed building. The development is proposed to be built on the site of the former Cumberland Hotel and Victoria Hall, which is a Grade II listed building.



**Material Palette**  
 1. External wall finish  
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 6. External wall finish  
 7. External wall finish  
 8. External wall finish  
 9. External wall finish  
 10. External wall finish

Block A	Block B
Block C	Block D
Block E	Block F
Block G	Block H
Block I	Block J
Block K	Block L
Block M	Block N
Block O	Block P
Block Q	Block R
Block S	Block T
Block U	Block V
Block W	Block X
Block Y	Block Z

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 Email: info@mossarch.co.uk  
 Website: www.mossarch.co.uk

Proposed Sheepcote Road Elevation (Block A and B)



**PROPOSAL SUMMARY**  
 The proposed development consists of a new 10-storey residential building (Block A) and a new 5-storey residential building (Block B) located on the site of the former Cumberland Hotel and Victoria Hall. The development is proposed to be built on the site of the former Cumberland Hotel and Victoria Hall, which is a Grade II listed building. The development is proposed to be built on the site of the former Cumberland Hotel and Victoria Hall, which is a Grade II listed building. The development is proposed to be built on the site of the former Cumberland Hotel and Victoria Hall, which is a Grade II listed building.



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Proposed front elevation of Block C fronting St Johns Road



Approved by: Name: [Name] Title: [Title] Date: [Date]	
Approved by: Name: [Name] Title: [Title] Date: [Date]	



Block No. Name Date	Designing/HD Name Date
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Designing/HD Name: [Name] Date: [Date]
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Proposed side elevation of Block B and C fronting the proposed public realm

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