

HARROW COUNCIL

ADDENDUM

PLANNING COMMITTEE

DATE: 17th March 2021

1/01 **ADDENDUM ITEM 1:**

Additional Information Submitted By the Applicant:

- Additional Information relating to Whole Life Carbon Assessment as per the GLA Stage 1 Report.
- Letter in response to the GLA Stage 1 Report (attached).
- Two additional visualisations:



ADDENDUM ITEM 2:

Relevant Planning History – Section 3 of the Report

P/3468/17 – this permission will expire on the 1st May 2021.

ADDENDUM ITEM 3:

Consultation Responses Update – Section 4 of the Report.

Since the agenda was published:

- A petition was submitted objecting to the proposal – 2221 signatures.
- A further 10 objections have been received (223 in total):

Summary of Additional Objections:

- Car park was very useful. Could have been used for markets.
- Harrow is becoming overdeveloped.
- There is no tourism in Harrow. Providing examples of serviced apartments in London is not comparable – it is a different market and demographic. No need for it. A target is not an identified demand. If there is an undersupply in hotel rooms why would hotels be closing.
- If Greenhill Way is not an appropriate site as it would fail to relate to the domestic scale of the neighbouring buildings, then this same reason applies for not placing the development in West Harrow.
- There are plenty of offices that can be converted into housing.
- Should be a maximum of 3 storeys.
- Harrow Council does not have a definition on what is a tall building.
- Insufficient cycle parking.

ADDENDUM ITEM 4:

24 February 2021

FAO: Katie Parkins
London Borough of Harrow Council
Civic Centre
Station Road
Harrow
HA1 2XY



John Bowles
E: john.bowles@savills.com
DL: +44 0203 810 9841

33 Margaret Street W1G 0JD
T: +44 (0) 20 7499 8644
F: +44 (0) 20 7495 3773
savills.com

Dear Katie,

Revised submission & response to GLA Stage 1 Report (Ref: P/3497/20) Vaughan Road Car Park, Vaughan Road, West Harrow, Harrow

We write to respond, and to submit revised information, to address minor issues raised by the Greater London Authority's (GLA) Stage 1 Report in respect of the above planning application. This letter seeks to respond in turn below to each matter that requires a response or revision in the Stage 1 report.

1. Principle of Development

Land use

We note that the GLA consider that the principle of development to be acceptable in-principle. The GLA's report states that the proposed redevelopment of this well-connected brownfield site to provide an aparthotel and supporting commercial uses would contribute towards a need for additional serviced accommodation in London and is supported in strategic planning terms. The report recognises the excellent PTAL rating of the site and the fact that the sequential test has been passed (paragraph 18).

In respect of paragraph 21 of the report, the GLA encourage the Council to consider conditions to limit the E Class uses on the ground and fifth floors, and to limit the maximum length of stay for occupiers. It has been clarified and confirmed that the commercial areas at ground and fifth floor levels will be ancillary to the hotel and a planning condition could be imposed to ensure these areas are not used for any other purposes. In respect of limiting the maximum length of stay, a proposed restriction for lengths of stay to control occupancy of the development has been issued to the Council by email on 10 September 2020.

Tall building

Justification and thorough consideration of how the proposals address the impacts set out in Publication London Plan Policy D9(C) is provided with the application submission, including visual impacts, functional impacts, environmental impacts and cumulative impacts. There are also clear social, environmental and economic benefits to the proposals, which are clear planning benefits and demonstrate a commitment to sustainable development.

2. Urban Design

Public realm

The Applicant remains committed to working with the Council to ensure the enhancements and public realm strategy can be fully realised. Planning conditions and heads of terms can secure both financial and legal obligations to ensure the public realm proposals can be delivered with the Council.

Architectural quality

It is accepted that key details including facing materials, window reveals, ground frontages, and rooflines can be secured by planning condition to ensure an exemplary build quality post-planning.

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therefore, if or when connection to a district heating network is possible, it is in viable location to form part of the adjacent plant room. The post and luggage rooms would be re-located within the ground floor hotel accommodation. The plan under Section 4.1.4.4 of the Energy Statement satisfactorily demonstrates that the site is future proofed for future connection.

In respect of paragraph 61, we can confirm that all of the accommodation will be connected to the communal heat network given the building will be managed and operated as an apart-hotel with ancillary facilities. If any further information is required to demonstrate the layout of the network, this can be secured by planning condition.

The scheme plans, and energy strategy, have been revised to increase the provision of PV panels. The original application scheme proposed 9.3sqm of PV panels and this is to be increased to 18.6sqm. This increase is possible through bi-solar PV panels being incorporated on the sixth floor level. All other areas of roof are either inaccessible for maintenance, too small in area terms to be feasible, will be overshadowed by plant equipment or building parapets, or are required for amenity or urban greening and biodiversity reasons and policy targets. The proposals seek to maximise on-site savings from renewable energy technologies achieving a 79% reduction in carbon emissions (with 62% carbon emissions reductions coming from the 'Be Green' stage). The result of increased renewables on-site has meant a reduction in the carbon off-set payment, as set out in paragraph 4.1.5.4. The carbon off-set payment will be secured by S106 agreement.

In addition to the carbon off-set payment being secured by S106 agreement, the commitment that the development will be designed to enable post construction monitoring with the GLA can also be secured by S106 agreement.

The GLA's comments on the Whole Lifecycle Carbon (WLC) Assessment are currently being reviewed by Verte and a response will be issued in due course, if required. However, we agree with the GLA's report that any permission could be conditioned to require the submission of a post-construction assessment to report on the development's actual WLC emissions.

Urban greening & biodiversity gain

The planning application submission demonstrates and provided sufficient evidence that the application proposals secure a biodiversity net gain in accordance with Publication London Plan Policy G6(D). As set out in the letter by Phlorum dated 23 September 2020 submitted with the application, the proposed development results in a total net increase of 101.36% for habitat units, and a total net increase of 2.55% for hedgerow units, based on the proposed landscape plans compared to the baseline situation. This can be secured by planning condition or via the S106 agreement.

The response also seeks confirmation that the development meets the minimum Urban Greening Factor (UGF) score set out by the Publication London Plan Policy G5. The planning application submission included a drawing showing the surface cover types and UGF calculation. This has been included as a separate plan by Adams & Sutherland with this submission, for ease of reference. The plan clearly demonstrates that the UGF score of 0.3 is exceeded and can be delivered without any planting outside of the red-line. The application complies with Policy G5.

5. Noise & Vibration

Paragraph 77 requires that guest rooms that face the railway tracks should be designed with noise and vibration in mind. It is accepted, as evidenced by the Noise Impact Assessment submitted with the planning application that acoustic glazing and sound insulation will be required. These can be secured by planning condition.

6. Revised & Supplemental Submission

This letter has been submitted electronically via email and comprises:

- This Cover Letter – Savills
- Technical Note: Road Safety Audit Response – Velocity Transport (September 2020)



- Energy & Sustainability Statement (including appendix documents) – Verte Sustainability Ltd (Rev C - February 2021)
- Updated Landscape Drawings (revisions to increase in PV panels) (Adams & Sutherland), as follows

Drawing Number	Drawing Title	Scale and Size
312_021_Rev E	Proposed Terrace Plan (Level 8 & Level 11) and Proposed Roof Plan (Level 6 & Level 12)	1:100 @ A1 and 1:200 @ A3
312_022_Rev A	Proposed Terrace Plan (Level 8 & Level 11) and Proposed Roof Plan (Level 6 & Level 12)	1:100 @ A1 and 1:200 @ A3
312_023_Rev B	Planting Plan Roof	1:100 @ A1 and 1:200 @ A3
312_024_Rev -	Urban Greening Factor	1:100 @ A1 and 1:200 @ A3
312_140_Rev B	Proposed Terrace Sections	1:200 @ A1
312_141_Rev C	Proposed Roof Terrace (Level 4 & 5) Sections II+JJ	1:200 @ A1
312_142_Rev A	Proposed Roof Terrace (Level 4 & 5) Sections KK	1:200 @ A1
312_143_Rev B	Proposed Roof Terrace (Level 4 & 5) Detail Section KK	1:200 @ A1

- Revised Drawings (revisions to increase in PV panels)(Adam Khan Architects), as follows

Drawing Number	Drawing Title	Scale and Size
P_L_106_Rev 001	Level 06 Floor Plan	1:100 @ A1 / 1:200 @ A3
P_L_107_Rev 001	Level 07 Floor Plan	1:100 @ A1 / 1:200 @ A3
P_L_108_Rev 001	Level 08 Floor Plan	1:100 @ A1 / 1:200 @ A3
P_L_109_Rev 001	Level 09 Floor Plan	1:100 @ A1 / 1:200 @ A3
P_L_110_Rev 001	Level 10 Floor Plan	1:100 @ A1 / 1:200 @ A3
P_L_111_Rev 001	Level 11 Floor Plan	1:100 @ A1 / 1:200 @ A3
P_L_112_Rev 001	Level 12 Roof Plan	1:100 @ A1 / 1:200 @ A3
P_L_113_Rev 001	Level 13 Roof Plan	1:100 @ A1 / 1:200 @ A3
P_L_200_Rev 001	Section AA	1:100 @ A1 / 1:200 @ A3
P_L_201_Rev 001	Section BB	1:100 @ A1 / 1:200 @ A3

The submission also includes two additional visuals which seek to illustrate the difference between the extant planning permission and the application proposals.

We await sight of any consultation comments from LBH's Urban Design Officer, Biodiversity Officer, Environmental Health Officer and Transport Team. We would wish, and expect to be given the opportunity, to review and respond to any comments received before the planning application is reported to Planning Committee.

If you require clarification of any aspect of the contents of this letter, or if further information is required, please contact me or my colleague Mark Thomson in the first instance.

Yours faithfully,

John Bowles
Director

Attachments – As listed above

1/02	<p><u>ADDENDUM ITEM 1:</u></p> <p>Consultation Responses Update – Section 4 of the Report.</p> <p>Since the agenda was published:</p> <ul style="list-style-type: none"> • Additional letters of support received. Total of 34.
2/01	<p><u>ADDENDUM ITEM 1:</u></p> <p>Officers seek deferral of this item. This is to permit the re-consultation of neighbours regarding the amendments to the refuse storage/parking to conclude on the 18th March and for all responses to be reported back to the April committee.</p>
2/02	<p><u>ADDENDUM ITEM 1:</u></p> <p>Officers seek deferral of this item. This is to permit the re-consultation of neighbours regarding the amendments to the refuse storage/parking to conclude on the 18th March and for all responses to be reported back to the April committee.</p>
2/03	<p><u>ADDENDUM ITEM 1:</u></p> <p>Amend 4.2 To date sixteen objections have been received in relation to the proposal.</p> <p>Add additional comment to table at 4.3.</p> <p><u>The storage and collection of waste.</u></p> <ul style="list-style-type: none"> • The proposal shows 6 bins sited in an alleyway at the side of the dwelling. In this alleyway there is insufficient width for the bins to pass each other when they are moved to the street to be emptied. This storage plan is poorly designed and restricts access for both flats to their respective gardens at the rear of the property. It is likely to cause a nuisance to neighbours and future occupiers, by reason of odour, noise and inconvenience. It will be visually intrusive in the street-scene when, due to the lack of provision of space, the bins will most likely end up permanently on the forecourt of the property. As stated in the Harrow Residential Design Guide SPD “Poorly designed, intrusive or inadequately sized facilities give rise to adverse visual impact and will not be acceptable”. <p><i>Officers response: The side alleyway is 1.1m in width which is considered sufficient for the moving of bins. A condition is recommended to ensure that the bins are stored in the designated spaces except for on collection day.</i></p>

2/05

ADDENDUM ITEM 1:

Consultation Responses Update – Section 4 of the report (page 316).

Since the agenda was published, one additional objection has been received. This is detailed below with officer response in italics.

Summary of Comments:

- The site is already regularly waterlogged, the drainage calculations specified do not show the soakaway to be adequate (wrong data used), and the soakaway is not even sited on the applicant's site.
The Council's Drainage Authority has provided the following advised that the proposed details are satisfactory. Although the location of the attenuation tank would be outside the original application site, it would nonetheless be located within land which is under the control of the applicant. This would therefore fall within Section 72(1)(a) of the Town and Country Planning Act 1990
- The site already becomes waterlogged in heavy rain; The reason why the nearby football pitches are having extensive drainage implemented is because the Bannister site is well known for water run-off and waterlogging in heavy rain; therefore a soakaway approach to removing surface water is not appropriate or workable
The Council's Drainage Authority has advised that the drainage implemented at the Bannister football pitches was a standard planning requirement as for all developments in Harrow; Surface water is not being removed from the site but rather contained; London clay (present in Harrow) is classified a non-aquifer of negligible permeability. However, the drainage authority do allow for soakaways to be constructed subject to sufficient storage provided.
- The soil characteristics have not been properly accounted for in the drainage calculations presented. The assumed soakaway rate from the tank is too high, and a storage system is therefore not feasible, the water will not drain away
The Council's Drainage Authority has advised that due to the impermeable nature of the majority of Harrow's subsoil (London Clay), additional measures should be in place to manage the eventuality of saturation. For minor developments soakaway volume can be calculated at 1m³ for every 16m² of surface area being drained.
- If a soakaway is seriously proposed, a soil percolation test needs to be carried out to determine the actual infiltration rate value to be used for this specific site in the soakaway calculation. Therefore there is inadequate evidence to discharge the Condition 5 (surface water disposal) for sustainable drainage on site.
The Council's Drainage Authority has advised that they rarely request infiltration tests to be undertaken by the applicant, but rather advise applicants to assume nil soakage and provide 1m³ of storage for every 16m² of new hardstanding. In line with the drainage recommendations, the applicant provided 7m³ over of what is required.

ADDENDUM ITEM 1:**Consultation Responses Update – Section 4 of the report:**

Paragraph 4.2 updated to states “A total of 10 responses were received”.

ADDENDUM ITEM 2:**Amendments to Amenity and replacement of condition no.5**

Paragraph 6.4.3 updated to remove references requiring further information from a revised noise report. Paragraph 6.4.3 to state:

“Despite the noise report discussing behaviours of patrons of adult gaming centres, (as further expanded in section 6.6 of the report), concerns of anti-social behaviour have been raised regarding the 24 hour operation of the proposed unit whilst in close proximity to residential units. The noise report, nor other supporting documentation do not detail management measures to address behaviours. As such it is considered appropriate to recommend that the opening hours of the unit are to be restricted as per the recommendation of Environmental Health Officer to 9:00am – 00:00am. The restriction of opening hours would serve to close the use of the unit prior to the early hours of the morning, limiting the amount of noise transference arising from the use, protecting the residential amenity of the units above the gaming centre and of adjoining occupiers. A further condition has been recommended requesting details of a management plan of the business itself to attain measures to limit any anti-social behaviour as a result of the use.”

Replacement of Condition no.5 with:

“The recommendations in the submitted Noise Report Ref: Report Merkur Slots 87 Burnt Oak Broadway Burnt Oak Noise Assessment (Dated 28th October 2020) hereby approved shall be implemented prior to the development being open to members of the public and shall be retained as such thereafter, unless otherwise agreed in writing with the local planning authority.

REASON: To safeguard residential amenities of the area and of neighboring occupiers”

Reason for replacement: It is considered following review of the comments from Environmental Health, that the application pertains only to a change of use of the existing unit and no external alterations and machinery/plants are to be installed into the fabric of the building. The submitted noise report show that the noise generated from the proposed use with the recommended details would not have an impact of significant detriment to neighbouring occupiers and the immediately locality, as such no further details are considered to be required.

2/09	<p><u>ADDENDUM ITEM 1:</u></p> <p><u>Consultation Responses Update – Section 4 of the report (page 6).</u></p> <p>Since the agenda was published, one additional neighbour objection has been received:</p> <p>Summary of Comments:</p> <ul style="list-style-type: none"> • House is not large enough for 9 persons and will increase noise levels • Out of character with the area • Refuse enclosure will not be used and will be an eyesore • Increased parking pressures <p><i>Officers response: Condition 8 of the planning permission has been attached to ensure that the waste bins will be stored within the enclosures at all times other than on collection days. The refuse enclosures are considered to be appropriate as they would help to safeguard the character and appearance of the area.</i></p>
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AGENDA ITEM 10 – REPRESENTATIONS ON PLANNING APPLICATIONS

Agenda Item	Application	Speakers
1/01	Vaughan Road Car Park P/3497/20	Cllr Kairul Marika (Back Bench) Cllr Adam Swersky (Back Bench) Cllr Christine Robson (Back Bench)
1/02	Halfords P/3305/20	Luisa Keig (Objector) Nick Cuff (Agent for Applicant)
2/01	Northcote P/2567/20	Nisha Chauhan (Objector) Ian Gilbert (Agent for Applicant) Cllr Norman Stevenson (Back Bench)
2/02	Northcote P/2785/20	Nisha Chauhan (Objector) Cllr Norman Stevenson (Back Bench)
2/03	64 Durley Avenue P/2534/20	Cllr Richard Almond (Back Bench)