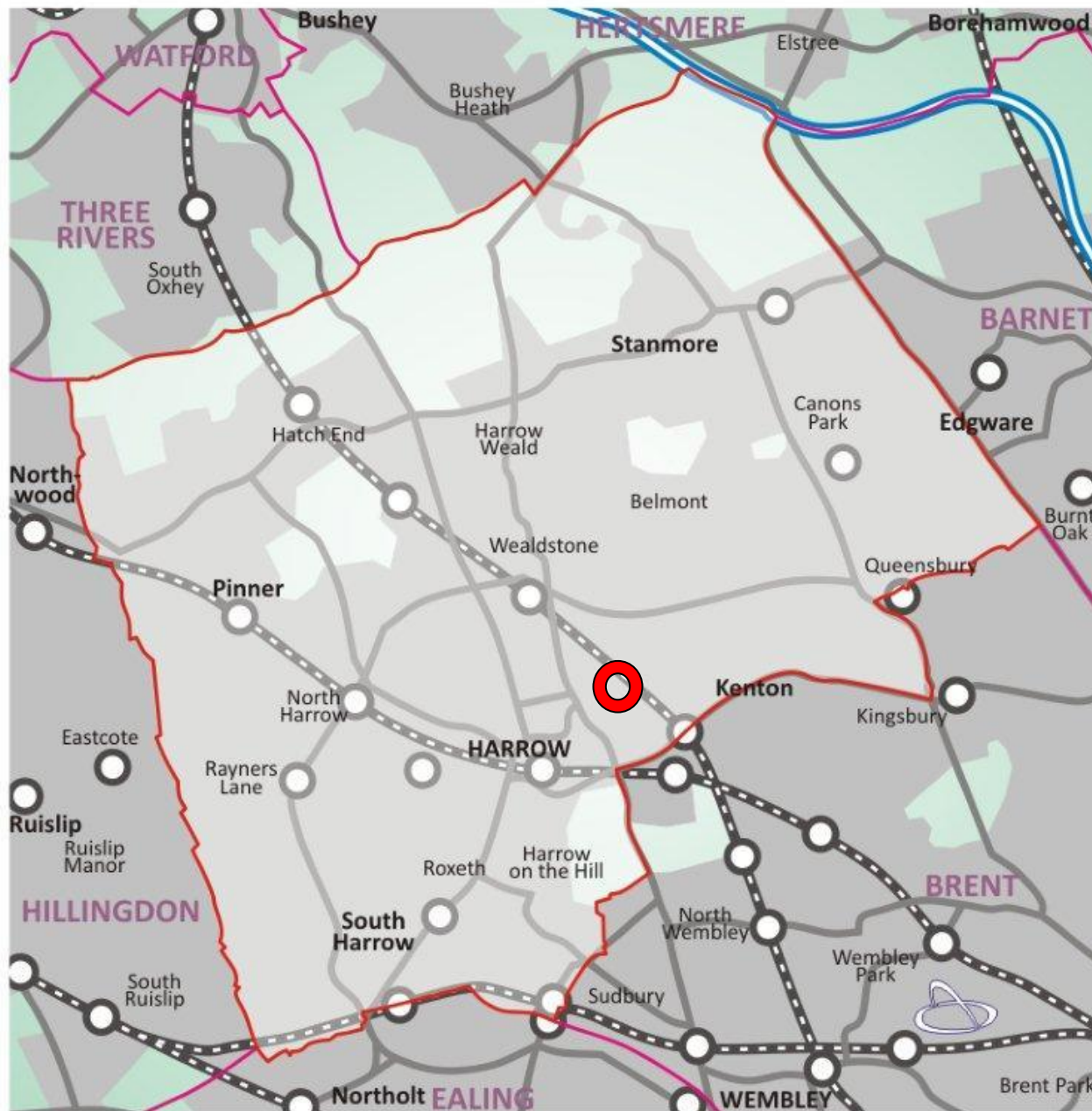
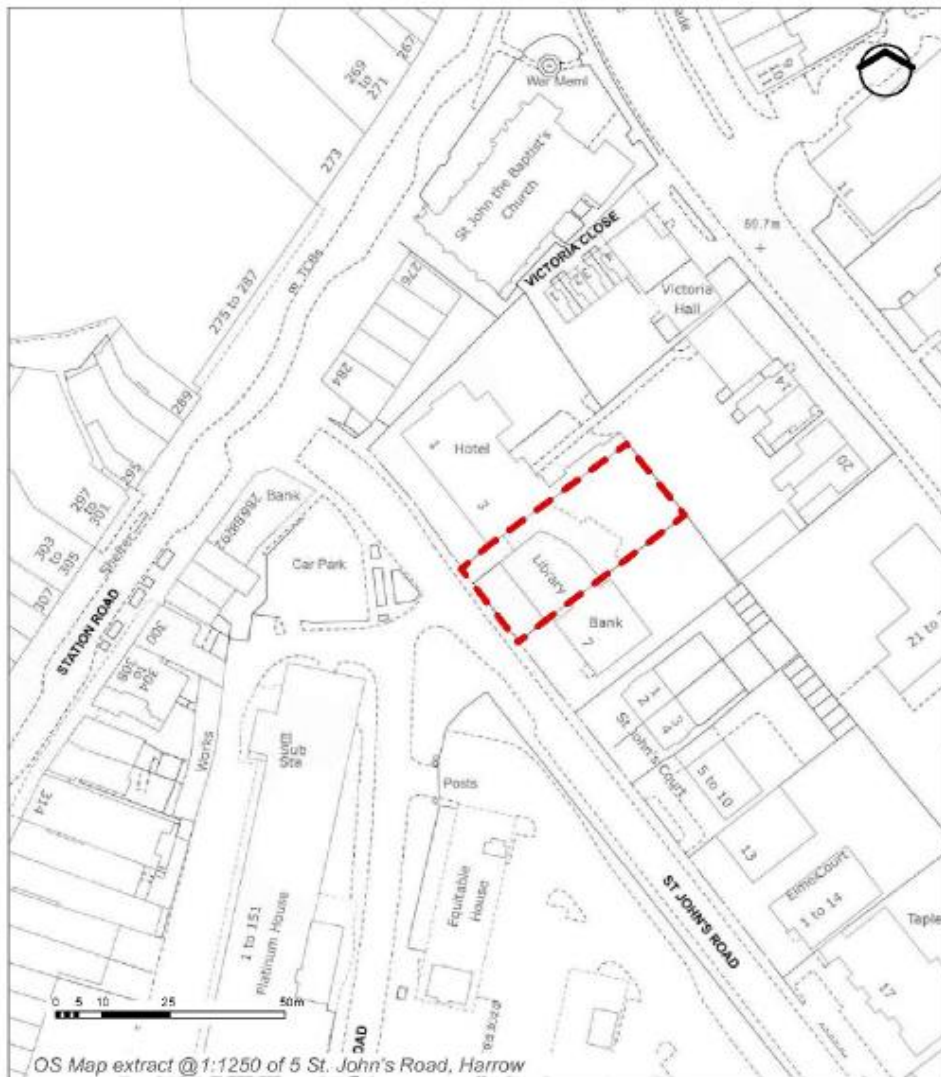


 = application site



Garden House, 5 St Johns Road

P/3066/20



LONDON BOROUGH OF HARROW

PLANNING COMMITTEE

20th July 2022

APPLICATION NUMBER: P/3066/20
VALID DATE: 28/08/2020
LOCATION: GARDEN HOUSE, 5 ST JOHNS ROAD, HARROW
WARD: GREENHILL
POSTCODE: HA1 2EE
APPLICANT: M & P PROPERTY HOLDINGS LTD
AGENT: HGH CONSULTING
CASE OFFICER: SELINA HOTWANI
EXPIRY DATE: 27th JULY 2022

PROPOSAL

Redevelopment to provide hotel accommodation (Use Class C1) and construction of basement level; ancillary restaurant and conference rooms (Use class E); bin store; landscaping; parking (demolition of existing building)

RECOMMENDATION A

The Planning Committee is asked to:

- 1) Agree the reasons for approval as set out in this report, and
- 2) Grant planning permission subject to authority being delegated to the Interim Chief Planning Officer 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, subject to amendments to the conditions, and no objection from HSE regarding fire details, including the insertion or deletion of conditions as deemed fit and appropriate to the development or the amendments to the legal agreement as required. The S106 agreement Heads of Terms would cover the following matters:

1. Carbon Offset

- Payment of a total financial contribution of £498,750 towards carbon offset which should be payable prior to commencement and verified at the completion of development with a top-up payment required for any shortfall in on-site carbon reductions compared to those proposed at application stage.
- Recalculation of the contribution to take into account any revised energy statement approved by the LPA.
- Provision of commitment that the development will be designed to enable post construction monitoring and that the information set out in the 'be seen' guidance is submitted to the GLA's portal at the appropriate reporting stages.

2. **Energy Centre**

- Provision of a safeguarding route to a connection to any future wider District Heat Network.

3. **Highways and Parking**

- A revised Guest and Staff Travel Plan to be submitted to the Council prior to the first occupation of the building. A travel plan bond (to be agreed with the Council) will be required to secure the implementation of all measures specified in the revised Travel Plan. The developer to ensure the effective implementation, monitoring and management of the travel plan for the site. Appointment of Travel Plan Coordinator. Travel Plan monitoring fee of £5,000.
- Section 50 works to include widening of the existing vehicle crossing and the relocation of a loading plate sign and hydrant sign.

4. **Employment and Training Plan**

- Payment of local Employment Contribution to the Council upon commencement of development and to be used towards employment and training initiatives within the Council's administrative area.
- Submission of an employment, training and recruitment plan to the Council for its approval
- S106 agreement will include penalty clauses for non-compliance with the above. Non-compliance is failure to deliver the obligations in the section 106 Agreement, irrespective of whether
 1. the Agreement states that it will discharge the obligation
 2. the Developer has paid the council (Xcite) to employ a training and employment co-ordinator and beneficiary funds to discharge the obligations, but the developer's contractors fail to work with Xcite to provide skill, apprenticeship and employment opportunities. HB Law has been working on relevant clauses.
- 15% of spend during the construction of the development is with suppliers in the council's administrative area.

5. **Legal Costs and Monitoring Fee**

- Payment of section 106 monitoring fee upon completion of section 106 agreement (amount TBC)
- Payment of all reasonable legal fees upon completion of section 106 agreement

RECOMMENDATION B

That if, by 27th October 2022 or such extended period as may be agreed in writing by the Interim Chief Planning Officer, the section 106 Planning Obligation is not completed, then delegate the decision to the Chief Planning Officer to **REFUSE** planning permission for the following reason.

1. 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 (2021), policies D2, E10, SI2, SI3, and DF1 of The London Plan (2021), policy CS1 of the Core Strategy (2012), AAP9 of the Harrow and Wealdstone Area Action Plan (2013), policies DM1, DM13, DM34, and DM50 of the Harrow Development Management Policies Local Plan and the Supplementary Planning Document: Planning Obligations & Affordable Housing (2013).

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: | All other Largescale Major Development |
| Council Interest: | None. |
| Net Floorspace: | 6,303 sqm |
| GLA Community Infrastructure Levy (CIL) Contribution (provisional): | £882,420 |
| Harrow CIL requirement: | £346,665 |

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 equality's 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

Policy D11 of The London Plan (2021) 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. However, a condition has been recommended for evidence of certification of Secure by Design Accreditation for the development to be submitted to and approved in writing by the Local Planning Authority before any part of the development is occupied or used.

1.0 SITE DESCRIPTION

- 1.1 The application site consists of a rectangular parcel of land occupied by a part 4, part five storey detached building with car parking and servicing to the rear. The lawful use of the site is office (formerly under use class B1a) which is currently vacant. The site is 0.1 hectare. There is a clear level change from the front to the rear of the site. As such there is a pedestrian ramp up to the main entrance and a vehicular ramp down to the rear parking area.
- 1.2 The site is bound by the Origin development to the north and west which was formerly known as the Cumberland Hotel. These buildings range from 16 storeys (fronting St Johns Road) stepping down to 11 storeys at the rear (fronting Station Road) (Block C); 7 storeys (fronting Sheepcote Road) dropping down to single storey serving the Victoria Hall along the new plaza (fronting Station Road), (Block B); and this would be linked to Block A comprising 8 storeys. To the south of the site is 'Bank House' which is a four storey building, beyond which further south are of similar height.
- 1.3 The wider context comprises St Johns Church which is Grade II Listed church building. Directly opposite is the Lyon Square residential development with a 14 storey block at the junction of Station Road and St Johns Road. Other blocks fronting St Johns Road range between 7 and 8 storeys.
- 1.4 The application site is located within the Harrow Town Centre and within the Harrow and Wealdstone Opportunity Area. The site is located within a high public transport accessibility area (6a). It is in the setting of the protected viewing corridor. A small rear part of the site is within Flood Zone 3a.

2.0 PROPOSAL

- 2.1 Demolition of the existing building and redevelopment of the site to provide a 140-bedroom hotel (Use Class C1) and ancillary restaurant. The building would be 12 storeys high with a basement level to be used for staff and servicing.
- 2.2 The front of the site would be levelled off and would contain one blue badge parking space and outdoor seating associated with the ground floor restaurant.
- 2.3 The ground floor will include cycle stores and refuse stores for users. The proposed development would be car free with the exception of a disabled parking space accessed via a shared surface from Station Road.
- 2.4 On the roof of the rear block intensive green roofs are proposed and 10 x photovoltaic panels on the roof of the front block.

3.0 RELEVANT PLANNING HISTORY

- 3.1 A summary of the relevant planning history is outlined below:

| Application No. | Description | Decision |
|-----------------|---|---------------------|
| LBH/39852 | Five storey office building with parking (revised) | Granted 31 May 1991 |
| P/3797/07 | Temporary change of use from office (Class B1) to Library (Class D1) for five years | Granted 17 Jan 2008 |
| P/0439/11 | Temporary change of use from office (Class B1) to Library (Class D1) until 2021 | Granted 11 Apr 2011 |

4.0 **CONSULTATION**

- 4.1 A total of 1105 consultation letters were sent to neighbouring properties regarding this application. A Harrow Times advert was published on the 1st October 2020. A total of 30 representations were received.
- 4.2 Following this, amendments were made and 1105 consultation letters as well as letters to those who made initial representations were sent out on 21st January 2022. Three site notices were re-posted on the 20th January 2022.
- 4.3 The overall public consultation period expired on the 11th February 2022.
- 4.4 37 objections and 2 support letters were received after the first consultation and 27 objections were received following the amendments described in the second round of consultation. All comments are summarised below.

Character

- Area cannot sustain too many high buildings and it may result in a fire safety hazard for buildings too close to one another.
- Out of character to have a hotel in a residential area.
- Scale of hotel would have an impact to the environment and landscape.
- Bulky, out of shape compared to other buildings in the area.
- Hotel is far too tall.

Second consultation:

- Hotel does not respect the street pattern and local context or scale and proportion of surrounding buildings and would be entirely out of character with the area.
- Very little space for landscaping.

Officer response: *This is discussed in section 6.3.*

Impact to Residential Amenity

- Overshadowing of neighbouring residential development.
- Loss of privacy to families living in those units.
- Inhibit the amount of daylight received.
- Impact of height on outlook and light to Origin development.
- Loss of light to units which are all south east facing on the neighbouring development.

- Children's play area would not longer be safe as hotel guests could see into it.
- Daylight / Sunlight report indicates that the garden area of the Cumberland Hotel site would be affected. In neighbouring residential development.
- Internal lighting in communal areas would affect sleep

Second consultation

- Revised plans are an improvement but do not address all of the concerns that have been raised by residents. Loss of privacy with rooms facing Byron Court.
- Scale of the proposal would still result in a loss of light.
- Affordable blocks to the rear of Garden House would be most affected by loss of privacy and overshadowing.
- Block sunlight of units at Master Court, Moore House and Byron Court.
- Revised plans still allow hotel room windows to look through most of Byron Court units.
- The Moore building and Byron Court would be meters away impacting sunlight and views.

Officer response: *This is discussed in section 6.4.*

Noise / Environmental Health

- Noise disturbance from luggage on pavement throughout the day.
- Significant noise, disturbance.
- Restaurant would cause disturbance to residents until late.
- Negatively impact air quality.

We confirm that it is not our preference to see an application being put forward for agreement, without a more representative noise report, and the relevant mitigation proposals etc. (See for example consideration 7. at Annex 2.); however accounting for where Planning is with this application, it's agreed that the conditions suggested would suffice in this case.

Officer response: *This is discussed in section 6.4.*

Economic Development

- Support generation of employment and improvement to the area as a result of redevelopment.
- Excited that this project would bring life to St Johns Road and hotel would bring value to retail area.
- Greater security would appear as a result.
- Good to see greater competition for only one existing Travelodge Hotel.
- Hotel development would be good for restaurants and businesses in the town centre.

Second consultation:

- No improvement from last proposal and cannot see how it would improve Harrow city community.

- Do not see need for hotel when there is already another in the vicinity.
- Hotel plan has zero commercial value.
- Devaluing of property in Byron Court.

Officer response: Please refer to section 6.3 below.

Highways Impact

- Not enough road access for fire trucks would lead to road congestion and parking altercations.
- Would require additional parking in a currently pedestrian friendly location.

Second consultation:

- No space for further deliveries or cars on this crowded, narrow, one way street which is already saturated with cars and delivery trucks from supermarkets 24/7.

Officer response: This is discussed in section 6.4.

Construction Phase

- Noise and disturbance during the demolition and construction phases whilst working from home.
- Construction phase would result in air pollution, noise and disturbance.

Second consultation

- Air and noise pollution from the build would damage the health of residents.

Officer response: As suggested by the Highways Authority it would be necessary for a Construction Logistics Plan to be submitted to ensure that noise and dust is minimised during the construction and respect the residential amenity of neighbouring occupiers.

Crime

- Increased anti-social behaviour due to hotel guests loitering throughout the day.

Second consultation:

- Unsuitable for a street which is almost all residential and would bring anti-social behaviour into the area.

Officer response: Please refer to section 6.9. Secure by Design officers were consulted and amendments were made in line with their comments.

Notwithstanding this, a condition to ensure secured by design accreditation is attained has been included.

Other Matters

- As there are windows on the south east elevation of the proposed development it would prejudice any forthcoming application on the Bank House site.

Officer comment: Part of the flank wall facing Bank House would not have any windows, the remaining windows would include privacy screening which would ensure these are angled away from the site to avoid any loss of privacy issues should a sensitive development come forward on this site.

Statutory and Non-Statutory Consultation

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

| Consultation Responses |
|--|
| <p>LBH Principal Urban Design Officer</p> <p>1) The site has neighbouring constraints principally the Origin Housing Harrow One development (previously Cumberland Hotel site). The units of this scheme facing the proposed site and will be directly impacted in terms of daylight, sunlight and outlook amenity by the proposed development.</p> <p>2) The relationship with New Lyon Square should be fully considered regarding the street-facing building frontage. This street elevation forms a highly visible boundary to a new public space for the town centre and should enhance this setting for local users.</p> <p>3) The proposed development is considered to have limited townscape impacts as the site is largely flanked by the Harrow One development to north and west, both wings of which are of a higher datum than the 12-storey building proposed.</p> <p><i>Officer response: Following these comments further Microclimate and Daylight/Sunlight reviews were undertaken. Please refer to section 6.4.</i></p> <p>LBH Highways Officer</p> <p>Highways have no objection however, we believe that this proposal could be further improved by increasing the disabled parking provision and relocating it away from the servicing access and changing the location of the cycle stands to the front of the building where they can be accessed by visitors (unlikely to be guests) and where they would be away from the servicing route.</p> <p>Construction Logistics Plan and highways works under highways agreement should be secured.</p> <p><i>Officer response: Noted, conditions and heads of terms included.</i></p> <p>LBH Economic Development Officer</p> <p>No objection, provided legal obligation is included which promotes local employment and training.</p> <p><i>Officer response: Noted, obligation included.</i></p> |

LBH Drainage Engineer

I can confirm that insufficient FRA is submitted. The site is in sw flood zone and CFS should be provided. Please advise the applicant to purchase our updated flood maps from infrastructure@harrow.gov.uk and revise the document. Also, please refer them to our DM Policies 9-12 with regard to raised FFL and no basements in flood area.

Officer response: Noted, conditions included.

Travel Plan Officer

A revised Travel Plan was submitted to cover the redevelopment of site 5 St John's Road, Harrow.

Travel Plan will be secured by legal agreement, of which the developer will be required to make financial contributions towards monitoring and remedial measures. Please reflect this in the Travel Plan. Full terms to follow after the amendments below has been incorporated in a redrafted Travel Plan.

.4 - Provision should be made to fund cycle training for staff who wish to learn. Please update or if this is not possible, please prepare a response on why this is not achievable.

10.1 - Please specify who will be surveyed and please commit to agreeing the survey structure with Travel Planners at Harrow Council beforehand.

10.1.3 any adjustment of targets must be agreed with Harrow Council before implementation. Please include in the Travel Plan.

10.1.2 - Data should be collected in the 6th month following occupation to allow a clearer understanding of Travel Patterns. Please update the Travel Plan to reflect this.

11.1.3 Targets can be revised following surveys. Some targets seem quite ambitious and may need to be reconsidered. I note this is covered in 11.1.5

Action Plan - Good and comprehensive. TPC should be in place at least 2 months prior to occupation. If staff details change during this time, Harrow Council should be notified in good time by emailing Travelplanning@harrow.gov.uk

Officer response: Noted, obligation included

LBH Principal Landscape Architect

No objection to the proposal, subject to relevant conditions.

Officer response: Noted, conditions included.

LBH Biodiversity Officer

Subject to appropriate conditions there appears to be no reasons why the scheme should not proceed on biodiversity grounds. Provision of the mix of green and bio-solar roof spaces and suitable wildlife shelters should provide welcome benefits for wildlife and help contribute to access to nature. A biodiversity condition is required.

Officer response: Noted, condition included.

LBH Environmental Health Officer

Contamination – no comments received.

Air Quality – no comments received.

Noise – Further information is required.

Officer response: Noted, conditions included.

LBH Waste Management Officer

No comment received.

LBH Planning Policy

In this instance, the principle of development is able to be supported

Energy Officer

- Condition requiring submission and approval of a revised energy statement prior to commencement of the development, with the development to be implemented in accordance with the approved statement and maintained thereafter.
- S106 obligations securing a carbon offset contribution of £498,750, which should be payable prior to commencement and verified at the completion of development with a top-up payment required for any shortfall in on-site carbon reductions compared to those proposed at application stage. As a new energy statement will be conditioned, the S106 should be worded to allow recalculation of the contribution to take into account any revised energy statement approved by the LPA. GLA Be Seen requirements should also be included in any S106 agreement, as well as heat network safeguarding obligations.

Officer response: Noted, obligation and condition included.

Transport for London

No objections

Designing Out Crime Officer

- Restaurant and hotel need to be separated;
- Hotel reception should be separated from the restaurant / bar.

- Redesign of ground floor reception to separated hotel and restaurant responsibilities.

Second Consultation:

A revised ground floor plan shall be submitted to ensure the development would achieve SBD certification.

Officer response: Noted, condition included for revised ground floor layout.

Thames Water

No objection subject to conditions in relation to Foul and Surface Water drainage. A drainage strategy is also required.

Second consultation:

No objection subject to informative for developer to read and understand Thames Water Guidance and appropriate surface and foul water drainage informatives.

Officer response: Noted, informatives included.

Fire Consultant

Escape routes

Both stairs serve both the upper floors and the basement level and are undivided, this appears departure from that which is recommended in ADB and BS 9999:2017.

It is noted that the operation of the evacuation lift “will take account” of the recommendations of section G.2.3 of BS 9999. This does not provide an indication as to whether or not the lift will be operated in accordance with the aforementioned section. This should be clarified.

Officer response: Updated fire strategy requested by way of condition.

Ministry of Defence (RAF Northolt)

No objection.

Greater London Authority (GLA)

Principle of development: The proposed redevelopment of this well-connected town centre and opportunity area site to deliver a 145 bedroom hotel is supported in principle subject to the resolution of other matters identified in this report (Paragraphs 13-23)

Urban Design: Whilst the design of the scheme is broadly supported, this site is not specifically identified as suitable for a tall building and therefore the application does not strictly comply with London Plan Policy D9. Following resolution of the other strategic issues raised in this report, and finalisation of the planning conditions and obligations necessary to mitigate in the impact of the proposal, this issue of non-compliance will be weighed against the secured public benefits of the proposal, and all other

material considerations, at the Mayor's decision making stage. (Paragraphs 24-37)

Transport: The applicant is required to make submissions in respect to a construction logistics plan. The Council should appropriately secure blue badge parking, cycle parking quantum and standards, healthy streets improvements and delivery and servicing arrangements (Paragraphs 38-43).

Sustainable development: Further information and clarification is required on the energy strategy before compliance with the London Plan and Publication London Plan can be confirmed. Further information is required regarding flood risk and drainage (Paragraphs 44-48).

Recommendation

That Harrow Council be advised that whilst the proposal is supported in principle, the application does not currently comply with the London Plan for the reasons set out in paragraph 52. Where the associated concerns within this report are addressed, the application may become acceptable in strategic planning terms.

5.0 POLICIES

"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.'

5.1 In this instance, the Development Plan comprises The London Plan 2021 [LP], The Harrow Core Strategy 2012 [CS], Harrow and Wealdstone Area Action Plan (AAP) 2013, the Development Management Policies Local Plan 2013 [DMP], the Site Allocations Local Plan SALP 2013 [SALP].

5.2 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 Development
- Design, Townscape, Character, and Appearance
- Residential Amenity
- Traffic, Parking, Access, Servicing and Sustainable Transport
- Environmental Considerations – Contamination, Noise, Air Quality
- Development and Flood Risk
- Biodiversity
- Energy & Sustainability
- Secured by Design
- Fire

6.2 Principle of Development

6.2.1 The relevant policies are:

- National Planning Policy Framework (2021):
- The London Plan (2021): SD6, SD7, SD8, SD9, E1, E10, HC6
- Harrow Core Strategy (2012): CS1
- Area Action Plan (2013): AAP1, AAP16
- Harrow Development Management Policies Local Plan (2013):DM34, DM35

Principle of Hotel Development in the Town Centre

6.2.2 The site is located in the Harrow (Metropolitan) Town Centre. London Plan Policies SD6, SD7, SD8 and SD9 support mixed used development in town centres and seek to enhance their vitality and viability by encouraging strong, resilient, accessible and inclusive hubs with a diverse range of uses that meet the needs of Londoners. These policies support enhancement of the night-time economy (Policy SD6) and redevelopment, change of use and intensification of identified surplus office space to other uses including hotels in town centre locations, especially in outer London. Residential development within the town centre is also acknowledged as playing an important role in town centre vitality however should encourage main town centre uses as part of a town centre first approach. This notion is reinforced by policy DM34 of Harrow's Development Management Policies Document (2013) which directs hotel development in sequential order, town centres being the first preferred location. The provision of hotel floorspace in the Metropolitan Town Centre therefore accords with the policies outlined above.

Loss of employment space

6.2.3 The former use of the site as a temporary library use (Use Class D1) lapsed on 31st March 2021, after which the property reverted to office use (Use Class E). Changes to the Use Class Order means office space no longer affords the same level of protection, specifically through the introduction of Class E within which office use falls in along with other retail type uses. Whilst the principle of the loss of existing employment floorspace within the town centre would not be encouraged, the proposed hotel and restaurant development would replace the office space with an appropriate town centre use which would also be considered as employment floorspace. Whilst there would be a loss of office floorspace of 1,403 sqm, this would be replaced by 6,303sqm of Hotel accommodation providing 140 rooms, a lobby and a restaurant which would result in 40 full time equivalent employees at the site (according to the application form).

6.2.4 As noted, the proposed development seeks to remove all of the existing office floorspace from the site. Policy E1 of the London Plan (2021) provides further policy and guidance in relation to office space across London. As noted above, redevelopment of sites of surplus office space is supported. Within the supporting text to Policy E1, paragraph 6.1.7 states *"Surplus office space includes sites and/or premises where there is no reasonable prospect of these being used for business purposes. Evidence to demonstrate surplus office space should include strategic and local assessments of demand and supply, and evidence of vacancy and*

marketing (at market rates suitable for the type, use and size for at least 12 months, or greater if required by a local Development Plan Document). This evidence should be used to inform viability assessments.”

- 6.2.5 At a local level, Policy AAP16C (Supporting the Service Sector in Harrow Town Centre) of the Harrow & Wealdstone Area Action (2013) sets out that; “*Major mixed-use redevelopment or change of use of existing offices of 1,000 sq m or more of floorspace within Harrow town centre will be supported where the proposal provides viable, new office floorspace at least equivalent in potential employment yield to the existing office floorspace.*” The proposed application by reason of its lack of appropriate marketing of the office use, does not satisfactorily justify that the office space is genuinely surplus.
- 6.2.6 Notwithstanding this given the lessened protection of office space under the new E use classes order (Former B1a), the existing floorspace could now fall within a range of other uses without the requirement to obtain planning permission. By reason of this, it is more difficult to protect the office space use and given the requirement for planning permission, and being located in a town centre location, the proposed replacement use must be considered. In this instance, the proposed use would provide a hotel, which is both an appropriate town centre use and would provide an employment generating use. It is a material consideration to mitigate the loss of office space from the borough even in the absence of appropriate marketing to determine if the office floorspace is genuinely surplus to requirement.

Visitor Accommodation

- 6.2.7 By nature of the hotel use, the proposed development would increase the level of activity on and around the site throughout the whole day, unlike the existing offices which if occupied, would typically only be operational during core office hours and closed at weekends. Whilst alternative (non-office) Class E uses may have the potential to retain similar levels of activity at the site, this is not sufficient grounds for refusal given Class E floorspace is not protected in Local Policy. The proposed hotel use and associated employment would enhance the vitality and vibrancy of the town centre and provide employment at the site.
- 6.2.8 London Plan Policy E10 (Visitor Infrastructure) supports the strengthening of London’s visitor economy and associated employment, particularly in parts of outer London well-connected to public transport. It notes that it is estimated that London would need an additional 58,000 bedrooms of serviced accommodation by 2041. It is also noted that the proposed hotel use would incorporate a restaurant which would be ancillary to the hotel use, but also available for use by the wider public. The provision of a restaurant open to the public would also assist with night time economy, and would therefore find support with Policy HC6 (Supporting the night-time economy) by providing an evening activity / destination.
- 6.2.9 Development Management Policy DM34 (Hotel and Tourism Development) directs new hotel developments to sites within the town centre, and also Policy DM41 supports development which would enhance the evening economy. The proposed hotel use and restaurant would find support from these policies.

- 6.2.10 Harrow & Wealdstone Area Action Plan Policy AAP1 (Development within Harrow town centre) supports a mix of uses to increase the vitality of the Harrow town centre. Policy AAP16 (Supporting the Service Sector in Harrow Town Centre) specifically supports hotel development on sites within Harrow town centre where it is consistent with other AAP policies, contributes to the delivery of objectives of the Core Strategy and is conducive with the residential environment within and surrounding the town centre. One of the Core Strategy objectives is to promote hotel development in Harrow town centre and thereby providing employment.
- 6.2.11 In terms of the principle of the proposed hotel development, it is considered that new visitor infrastructure at this location is supported.

Economic Benefits

- 6.2.12 Harrow Town Centre is within the 'heart of harrow' and is generally known for its vitality and vibrancy. The site is currently vacant and the proposed hotel development would result in a number of economic benefits which would boost local businesses, complement future public realm developments which would in turn benefit the local and visitor economy and generate a number of short and long term employment. Full information is set out in the Economic Statement. The jobs would be secured by way of legal obligation via a training and employment plan. The benefits are outlined below:

Construction Phase:

- £12m investment;
- 35 gross direct jobs;
- 25 net direct jobs;
- 15 net indirect jobs;
- £7.5m productivity boost

Operational Phase:

- 40 on-site jobs (including front of house, restaurant and cleaning staff)
- 30 net direct jobs (including 15 for Harrow residents);
- £2.4m productivity boost (including £14m estimate in Harrow)
- £230,000 business rates
- 93,000 visitors
- £8.9m visitor expenditure
- Up to £390,000 supply chain expenditure

- 6.2.13 It is clear that there are number of short and long-term benefits which span locally across Harrow and are widespread which in turn would enhance and maintain the vitality and vibrancy of Harrow's Town Centre as advocated by the NPPF's town centre first approach to development.

Conclusion

- 6.2.14 Whilst the applicant has not robustly demonstrated that the existing authorised office floor space on site is surplus to requirement, it is acknowledged that the specific office use could be lost to other E use class activities without the need for planning permission. However, the proposed development in this instance would replace this

floorspace with a main town centre use (as per NPPF (2021)) and also ensures that an employment generating use would be re-provided on the town centre site. Furthermore, it is clear that there is a need for hotel rooms as a key element to tourist infrastructure which would provide a meaningful contribution to the estimated rooms required across London. Given the clear economic benefits of the scheme within a preferred town centre location, the principle of development is able to be supported.

6.3 Design, Layout, and Appearance

6.3.1 The relevant policies are:

- National Planning Policy Framework (2021)
- The London Plan (2021): D1, D2, D3, D4, D5, D8, D9, D12, D13, G5, G7
- Harrow Core Strategy (2012): CS1
- Area Action Plan (2013): AAP3, AAP4, AAP6
- Harrow Development Management Policies Local Plan (2013): DM1, DM22, DM23, DM45

Context

6.3.2 The proposal for a 140-bed hotel within the Opportunity Area is considered appropriate given its town centre location and high PTAL. The site has constraints regarding the neighbouring Origin Housing scheme (Cumberland Hotel site) to west of site and to north/rear (Sheepcote Road). There are also opportunities to strengthen the relationship with the New Lyon Square residential development regarding the proposed frontage as the subject site benefits from a highly visible boundary to a new public space for the town centre and this should enhance this setting or local users.

6.3.3 The GLA highlighted in their Stage 1 response that the main access point of the proposed development would be maintained from St. Johns Road through a dedicated service entrance which would benefit from generous glazing at the front to provide a large area of active frontage onto the public realm. This layout responds to the existing and emerging streetscape noted above. The impacts to the Origin Housing Scheme are discussed further below.

Tall Buildings, Height and Massing

6.3.4 The London Plan policy D9(A) states that development plans should define what is considered a tall building for specific localities (although not less than 6 storeys or 18 metres) and identify suitable locations; and identify any such locations and appropriate tall building heights on maps in Development Plans. It also sets out requirements for assessing tall buildings including addressing visual impacts, functional impacts and environmental impacts. Harrow Core Strategy includes footnote 23 which sets out the height 30m as the threshold of a tall building within the Harrow and Wealdstone Opportunity Area. Given that the proposed building height is 12 storeys and up to 37.5m high (above the 30m height), the proposal would be subject of London Plan policy D9.

- 6.3.5 Part (B) of the policy states tall buildings should be directed to areas identified on maps in the Development Plans. The GLA notes that Harrow's Area Action Plan does not specifically identify the subject site as being suitable for a tall building, and in this respect conflicts with Policy D9. However, Harrow's Core Strategy does direct taller buildings to the Harrow and Wealdstone Intensification Area within which the site is located. Whilst the AAP and Core Strategy predate this policy, the Inspector on a recent appeal decision at The Ridgeway site (APP/M5450/W/22/3292719) considers these policies to still be relevant and consistent with the London Plan:

"I consider that the definition contained in footnote 23 is locationally specific to the Intensification Area and does not extend to the rest of the borough. Such a view is consistent with the spatial vision for Harrow, and also with a recent appeal decision at Canons Park Station." This demonstrates that the thrust of the Local Plan is consistent with the objectives of the new London Plan and therefore the LPA consider the scheme acceptable with regards to Part (B). Where a taller building such as this however is not an 'Allocated site', AAP 6 (Development Heights) states that building heights for development outside of the identified tall building Allocated sites (Chapter 5 of the AAP) should be consistent with the site's surroundings, including nearby sites, having regard also to the need to achieve a high standard of development, site context and delivery of the AAP objectives. This and the assessment under part (C) of policy D9 is therefore relevant.

- 6.3.6 Notwithstanding the comments raised in respect of Policy D9(B) by the GLA, the emerging context of the site and its economic and wider public benefits were acknowledged and therefore the Stage 1 response notes that these should be weighed in the planning balance which are considered to appropriately mitigate any harm caused by the presence of a tall building at this site. Part (C) of policy D9 sets out criteria under which the impact of development proposals should be assessed. This is necessary from the outset to evaluate whether the public benefits of the proposal outweigh any potential harm.

- 6.3.7 Table 1 below provides an assessment of Policy D9 against the development proposal:

| Impact | | | Justification |
|---------------|--|---|--|
| Visual Impact | a) Views of buildings from different distances | i) Long range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategy views | The proposed site is not located within the Protected Viewing Corridor. When seen in longer viewpoints it is considered to have a minor impact in the midst of the adjacent Former Cumberland site (16 storeys), and 14 storey tower opposite at the junction of St Johns Road and Station Road, as well as a number of blocks up to 9 storeys in the vicinity, including Platinum House (8 storeys), Congress House (9 storeys approved) and Gayton Road (up to 11 storeys). In this context, the application scheme would be |

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| | | | consistent with the overall character of these views. |
| | | ii) Mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportion and materiality. | At 12 storeys in height it is considered that the proposal would appear subservient to the taller buildings nearby. The proposal would result in the proportion of the building being more akin to the emerging pattern of development encompassing a tall and slender built form. The distribution of massing to align with that of the neighbouring development and stepped and set back siting of the rear blocks would take account of the surrounding residential development. The high quality materiality provided would slot into the street and townscape ensuring it would not appear visually intrusive, rather architecturally interesting from mid-range views. |
| | | iii) Immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower heights or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity and privacy. | The creation of a levelled surface and active frontage provides clear legibility which would complement the local existing and emerging townscape, particularly the new public square at Greenhill Place. The proposed scheme would contribute positively to the vitality and viability of the town centre through the activation of this site. |
| | b) Whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding. | | The proposal would enhance the spatial hierarchy in line with the emerging context and is one of a number of higher density developments in the town centre due to its appropriate siting. It would complement the new public realm improvements coming forward as part of the Lyon Road scheme through the ground floor activation and generation of footfall into the |

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| | | locality. Together the cluster of taller buildings would reinforce and act as landmarks to mark this new hub. |
| | c) c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan | The materials palette is considered to successful. The high quality materials would ensure they would be functional as well as attractive and the similar material language across all elevations would ensure cohesiveness with the host property. |
| | d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area | <p>The site is not in a conservation area, nor does it contain any listed buildings, however a number of heritage assets are in close proximity. These include the Grade II Listed Church of St John the Baptist and the Station Road directly west of the plot, Grade II Listed World War II war memorial located at the northern end of the St John the Baptist churchyard. To the north of the plot beyond Sheepcote Road is the Grade II listed Granada Cinema.</p> <p>The proposed development would be almost entirely concealed by the existing Origin development buildings which sit between the application site and the heritage assets listed above and which would have a maximum of 16-storeys. As such there would be very limited additional visual impact arising from these proposals and the proposals would not harm to the significance of any of the area's heritage assets and deliver a high quality scheme which reflects the existing and emerging context of the site.</p> |
| | e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it | The building is not located near to a World Heritage Site and will therefore have no impact. |
| | f) buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river | The site is not located near the River Thames and will therefore have no impact. |

| | | |
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| | g) buildings should not cause adverse reflected glare | The building has been appropriately designed with carefully considered materials to ensure that there will be no adverse reflected glare as a result of the proposed development. |
| Functional Impact | a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants | A Fire Safety strategy has been provided to ensure emergency exit routes and materials are sufficient to accommodate the number of occupiers and to ensure safety in the event of a fire or emergency. |
| | b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process | The Delivery and Servicing Management Plan sets out the arrangements proposed which was prepared ensure minimal disturbance to the surrounding public realm. |
| | c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas | The proposed internal design and landscaping masterplan ensures that there are no areas that will be limited isolation or overcrowding potential. |
| | d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building | The Transport Statement and Servicing Strategy has been provided in support of the application which demonstrates appropriate arrangements are in place. The strategy also demonstrates that there is sufficient capacity of the road and transport network to accommodate the current development. |
| | e) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area | The Economic Statement submitted with the application demonstrates the strong demand for the proposed use in this part of the Borough and sets out the significant economic benefits the scheme will bring in terms of jobs and spending to the local area, both during the construction and operational phases. |
| | f) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental | There is no interference with aviation, navigation or telecommunications anticipated. |

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| | effect on solar energy generation on adjoining buildings | |
| Environmental Impacts | a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building | The submitted suite of technical documents demonstrate the comfort and enjoyment of open spaces around the building will be improved overall. Where there have been issues raised in relation to daylight and sunlight further studies have been undertaken and advice given to seek appropriate mitigation. |
| | b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions | |
| | c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building | |
| 4) cumulative impacts | a) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting. | <p>The visual, functional and environmental impacts of the scheme are cumulatively positive as identified, particularly in relation to improving the vitality and viability of the town centre and supporting public realm improvements.</p> <p>The proposed development remains subservient to the nearest tall buildings and is not significantly taller than much of the surrounding development. The proposals are therefore highly unlikely to lead to a cumulative visual impact over and above the circumstances of the existing local context.</p> |

6.3.8 Part D of Policy D9 requires free to enter publicly-accessible areas to be incorporated into tall buildings where appropriate. The GLA have suggested that this includes making the toilets publicly accessible. To maintain the safety and security of hotel clients it is not considered that this would be appropriate in this circumstance, however users of the restaurant which is publicly accessible would have access to these facilities.

6.3.9 Notwithstanding the above, the proposal offers other wider public benefits. AAP 6(D) states that tall buildings should "...be located to draw attention to locations of civic importance, major public transport interchanges; and areas of important public realm" Greenhill Place directly adjacent to the proposed development is envisaged to be a new public square with high quality public improvements, including food

kiosks and outdoor seating. The hotel development being sited almost opposite this area is considered to provide a complementary use by further stimulating an otherwise underused part of the town centre through the creation of an active frontage characterised by large expanse of ground floor glazing to accommodate the hotel reception and restaurants, drawing both hotel visitors and the general public to the site and wider locality and creating a safer area through increased natural surveillance as well as through appropriate security measures by virtue of the development.

- 6.3.10 On the basis of the above assessment, it is considered that the proposed development would not cause significant impact to the wider or local townscape to the detriment of the character and appearance of the area given the current and emerging context. There are a number of functional and economic benefits which would outweigh harm, particularly in terms of the environment and given its town centre location. On this basis, the principle of a tall building at this site is considered appropriate.
- 6.3.11 The site falls within the 'blue', 'black link' and 'black dotted line' RAF Northolt Safeguarding Zones set out in the Local Plan which requires Consultation required for any building, structure or works exceeding 91.4m in height above ground level. The Ministry of Defence (MOD) were consulted and note that the application site is 6km from the entire of the airfield so would be within the aerodrome and birdstrike safeguarding zones. However, the MOD has confirmed that there are no safeguarding objections to this proposal.

Massing, Scale & Built Form

- 6.3.12 A number of design amendments have been made during the course of the application which will be drawn upon throughout this section. Reductions in height from 14 to 12 storeys over the previous design iteration are significant and highly welcomed, presenting a much more comfortable relationship to the Origin development to north and west of site whilst continuing to provide sufficient density required of a central town centre location. Revising the massing to appear as a single block of a consistent twelve storeys simplifies the built form, with only a small vertical step to the parapet and small step in the footprint to the southern portion of the development, both of which have no impact on the overall massing. The perceived massing from the front elevation appears proportionate in terms of the proposed height and width of the built form and deferential to the adjacent Harrow One scheme to rear and west.
- 6.3.13 Additionally, the revised footprint which increases the separation distance between the principal north elevation and the Origin development is equally welcome and significantly reduces overlooking and overbearing concerns present in the previous design iteration. Such improvements have bettered both access to natural light and aspect for existing units surrounding the site which face south and east which form part of the Origin Housing scheme.
- 6.3.14 Whilst distances from proposed principal elevations and windows to those of neighbouring residential developments are relatively small, given the dense nature of this town centre location such distances are deemed to be acceptable to enable land in the town centre to be effectively utilised. Mitigation measures as requested

by officers such as reductions in height, increased setbacks and screening of windows in elevations are seen as successful measures in reducing harm caused by the proximity of the development to facing habitable room windows within the Harrow One (Origin Housing) scheme. These measures principally reduce overlooking, overbearing, overshadowing and reduced daylight and sunlight impact to adjacent existing residential units.

Public Realm and Landscaping

- 6.3.15 The provision of a ground floor bar/restaurant use facilitates the activation of the public realm in front of the development through the provision of al fresco dining seating and planting. This will serve to animate this part of St Johns Road and the wider Lyon Square area.
- 6.3.16 The location of an accessible parking bay to the frontage and adjacent to the outdoor dining area and main entrance continues to feel incongruous with the pedestrian approach to the hotel entrance. However, it is a positive that this is the nearest point to the hotel entrance and given the site constraints which would make it difficult for this provision to be located elsewhere on the site it is considered the mitigation provided by virtue of the outdoor planting present in the frontage would help to draw attention to the entrance of the hotel as well as the active frontage. The Landscape Officer acknowledges that improvements to hard and soft landscaping could still be made and therefore it is considered necessary to include a condition sets out a scheme which includes landscaping details, green and brown roof details, levels and lighting plans and their management to ensure a high quality public realm.

Wind Microclimate

- 6.3.17 A Microclimate study was prepared by RWDI on behalf of the applicant to assess wind conditions resulting from the development. The updated report following initial review concluded that there would be proposed seating which requires the proposed landscaping scheme to be suitable for amenity use during the summer season. Off-Site, there would be isolated windy locations; however, these would either occur in the baseline / existing scenario or would be expected to be suitable when the proposed landscaping is taken into consideration. As such, no further testing is recommended as necessary. The LPA appointed Wilde Analysis Ltd to review the report. Following the reduction in height and footprint following amendments, the review concluded that the report would appear to follow best practices with regards to the microclimate analysis of tall buildings and therefore it is found to be suitable for the intended purposes. The LPA consultant also notes that pre-existing conditions in the adjacent corner with Harrow One (Origin) are now shown to be improved.
- 6.3.18 The Landscape Officer references the landscape mitigation required to mitigate the summer season impact to the outdoor seating area which is one category windier than suitable for seated occupants and states (on the Lawson Comfort Criteria) during the summer season. To mitigate this the planters at 1.5 metres in height are proposed. In this context and location the planters are considered to be high and could pose a secure by design risk, providing places to hide, as well as appearing overbearing in such a small space. Alternative landscape design solutions to mitigate the wind in the external amenity space fronting St Johns Road would

therefore be necessary, rather than the use of such high planters. This could however be addressed as part of the landscape conditions.

- 6.3.19 In this regard, subject to the landscaping conditions mentioned above, the proposal would meet the requirements of London Plan Policy D8(G) in that consideration has been given to the local microclimate created by buildings, and the impact of service entrances and facades on the public realm.

External Appearance, Composition and Materiality

- 6.3.20 The use of louvred/ perforated panels to west and north elevations to provide additional privacy to Origin flats and hotel suites within the development alike is appropriate and will aid in reducing actual and perceived overlooking between the two developments. The use of similar material language and detailing for both side and rear elevation protruding perforated screens and front elevation infill panels to window openings would assist in providing a cohesiveness to all elevations and helps integrate privacy screens into the architectural design.
- 6.3.21 The addition of the same treatment to the south-east facing elevation is positive as despite not featuring the same overlooking issues as that of the north-west elevation, such treatment of window openings would ensure It would not prejudice future development on the neighbouring site, namely 'Bank House.' Furthermore, the staircase block to the rear now features a false window to ameliorate overlooking concerns. This is discussed further in the next section of the report.
- 6.3.22 The front street-facing elevation is considered to be successful featuring a good gridding and rhythm to fenestration and additional relief in surrounding brickwork to support this. The choice of window unit and associated infill panels work well and do not result in large expanses of brickwork. Additionally, the ground floor elevation is well differentiated, with an alternate brick type and fascia boards and the first floor serves as a successful transition, using elements of upper storey and ground floor facades. West and east flank elevations feature sections without window openings to their southern ends. Recessed brickwork pattern has been used for these sections to provide visual interest, which is positive and successful.
- 6.3.23 The rear elevation features a similar element of feature brickwork and attempts have been made to limit window openings to this elevation due to the proximity to habitable room windows of the adjacent Harrow One development. While overlooking continues to occur, it is noted that the design team have maximised both setback and window opening reductions to this elevation. Gold and champagne tones of glazing units and perforated panels complement the buff colour of brickwork and result in a successful external material palette.
- 6.3.24 A condition will be attached to any recommendation to grant planning permission to confirm the maintenance strategy of the building and to ensure the final building materials are approved by the Local Planning Authority.

Refuse and Servicing

- 6.3.25 A refuse store is proposed at ground floor level which is directly accessed from St Johns Road. All refuse collections would take place on site within the service yard at the north-western edge of the site.
- 6.3.26 The waste strategy and collection would be undertaken privately and based on the details provided officers have no objections to the proposal.

Summary

- 6.3.27 In conclusion, the proposed development, subject to the imposition of appropriate conditions, would achieve a high standard of design and layout, which would add positively to the built form, providing a high-quality development which would substantially contribute to the character and appearance of the area, subject to any conditions attached to any permission given being met.

6.4 Impact to Residential Amenity

- 6.4.1 The relevant policies are:

- The London Plan (2021): D3, D5, D14
- Harrow Development Management Policies Local Plan (2013):DM1
- Supplementary Planning Document: Residential Design Guide (2010)
- Housing SPG (2016)

Amenity of Future Occupiers and Accessibility of the Hotel

Unit Layout and Size

- 6.4.2 There are no prescriptive space standards for visitor accommodation set out in the Development Plan, although the accommodation will comprise a mixture of double/triple/quad rooms ranging from 16-21 sqm. When compared to other hotel developments in the locality this would appear reasonable. The London Plan Policy D5 requires that all new development achieves the highest standard of accessible and inclusive design and can be used safely, easily and with dignity by all. London Plan Policy E10 requires that 10% of new bedrooms are wheelchair accessible or that 15% of new bedrooms are 15 per cent of new bedrooms to be accessible rooms in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice. Accordingly, the proposal provides 14 x universal access rooms with 3 x lift access to provide ease of accessibility. A condition will be added to any positive recommendation to ensure these wheelchair units are implemented.
- 6.4.3 The urban design officer also notes that the ground floor arrangement is generally successful, with café/restaurant use to frontage providing activity to the street scene which can extend into the public realm. The general arrangement of hotel suites, access corridors and cores for first to eleventh floors is logical and would maximise aspects to guest suites. Furthermore, the suites have been oriented to reduce west east and north facing units as much as possible, with suites located to the south of

the plan featuring window openings which face south-west. This, by extension results in sections of the west and east flank elevations which do not feature window openings, which is positive.

Outlook/Visual Amenities

- 6.4.4 There is some outlook from the proposed hotel suites at the side elevations to mitigate any impacts on the neighbouring properties, through the use of perforated privacy screens. These allow natural light into the rooms whilst ensuring that it would protect the neighbouring privacy. Their siting in the window direct views towards the front of the site. Due to the appropriate internal layout and short term nature of the proposed development it is considered that the development would provide adequate visual amenities from the main areas of the proposed units and are considered acceptable.

Privacy

- 6.4.5 As noted above, the north and north western window arrangement which would flank the Origin development as well as to the rear would benefit from perforated privacy screens which would mitigate any infringement directly parallel with the proposed hotel from the neighbouring Harrow One (Origin) development. To the rear of the site, one of the two windows would be served by a stairwell which would reduce a perception of overlooking from that side and the large separation distances of approximately 13m as well as the privacy would help to mitigate any impact.
- 6.4.6 There are no windows on the south east elevation facing 'Bank House' offices and the remainder of the building would not face onto the neighbouring building but would incorporate privacy screens to safeguard future opportunities coming forward on that side.

Summary

- 6.4.7 Officers therefore consider the quality of accommodation for future occupants of the proposed hotel acceptable. There is no daylight and sunlight requirement for serviced accommodation. Given that the outlook provided from the windows on the north and south elevations are acceptable for each unit, officers consider the level of amenity within the units is supported.

Amenity Impact on the Neighbouring Occupiers

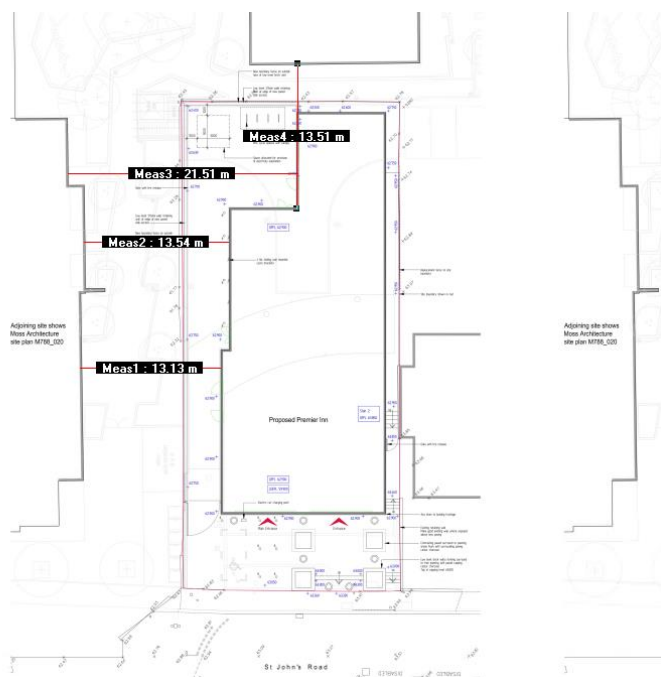
- 6.4.8 Part C (Privacy and Amenity Considerations) of Policy DM1 (Design and Layout Considerations) requires all development proposals must achieve a high standard of privacy and amenity. Proposals that would be detrimental to the privacy and amenity of neighbouring occupiers, or that would fail to achieve satisfactory privacy and amenity for future occupiers of development, will be resisted.

Outlook/Visual Amenities

- 6.4.9 To the south eastern side of the development is 'Bank House' which is a 4 storey development containing offices. Given the commercial nature of this building,

officers consider there is no relevant assessment needed of outlook and visual amenities from this neighbouring location.

- 6.4.10 With respect to the Origin/Hill development, there are residential properties located to the north east and north west of the site. The scheme has been amended so that the overall height is reduced; the massing is substantially reduced to rear and there are a number of steps to the rear to provide larger separation distances which would reduce the visual impact. The distances are show in the figure below.



- 6.4.11 It is noted that the residential properties of the south eastern facing units in Block C of the Origin/Hill block are single aspect units. The proposed scheme has however been amended to sensitively address the site circumstances of this block by proposing a single storey element to the rear which rises up to 12 storeys with large separation distances. Officers acknowledge that there would be notable visual impact to the outlook of mainly centrally located and lower units in terms of outlook and visual amenity. However, the majority of windows serve bedrooms, which are deemed less sensitive as these rooms are not the main daytime living areas. Where there are single aspect units located centrally there is a separation distance between the buildings of more than 13m at its closest point. The Mayor's Housing SPG (paragraph 2.3.36) states that in achieving visual separation between dwellings historically 18-21m separation has been required. However, it notes that whilst this can be a useful 'yardstick' these cannot be applied rigidly to unnecessarily restrict density. It should also be noted that visitors of the proposed development would not be permanent occupiers so greater flexibility can be applied. Notwithstanding this, these kinds of separation distances are notable between the rear facing units of blocks on Lyon Road and St Johns Road in the Lyon Square development and are common in higher density development within town centres.
- 6.4.12 Block A directly to the rear of the proposed development comprises dual aspect residential units with rear facing recessed balconies. On this side the single storey element housing the refuse area would be close to this boundary. However, the nearest ground floor units would be 4.6m away. The back to back relationship would

be over 13m which is considered to be appropriate given the circumstances set out above.

- 6.4.13 As also highlighted in the daylight and sunlight assessment below, officers consider the windows on the south eastern elevation of the neighbouring development compromises the development of the application site, and given the proposed development is short-let accommodation, on balance, the visual amenity from the proposed development is considered appropriate based on the building heights, distances between buildings, and site circumstances.

Overlooking & Privacy

- 6.4.14 As noted above, the proposal has been designed to ensure that the adjacent neighbouring sites are not compromised both in terms of the existing developments and any future developments coming forward.
- 6.4.15 Due to the angle and relationship of windows on the proposed development the privacy screens direct people to look towards the St Johns Road rather than directly opposite to the Origin/Hill residential units. On this basis, officers consider the scenario of overlooking would be limited, and the privacy levels of the neighbouring development would be acceptable in this regard.
- 6.4.16 Similarly, to the rear of the building, the window to the staircase at the rear is now a false window to avoid any overlooking concerns. Furthermore, the window on the rear elevation of the hotel units would also be false as these would be dual aspect. The continuation of the privacy screens would ensure that the perceived overlooking is also reduced. The flank elevation facing 'Bank House' would also have a part blank façade which would incorporate feature brick work and on the rear block would feature privacy screening to ensure that future development is not compromised on that side.

Daylight, Sunlight & Overshadowing

- 6.4.17 The applicant has submitted a Daylight & Sunlight Assessment Report (prepared by eb7, November 2021). This was updated in line with initial feedback from the LPA's consultant Avison Young. The assessment confirms that the analysis was undertaken in accordance with the advice and recommendation set out in the BRE Guidelines 'Site Layout for Daylight and Sunlight: A Guide to Good Practice' (2011). There are three detailed methods for calculating daylight recommended in the BRE Guidelines: Vertical Sky Component (VSC), No Sky Line Contour (NSL) and Average Daylight Factor (ADF). The VSC and NSL are primarily used for the assessment of existing buildings, while the ADF test is generally recommended for proposed rather than existing dwellings. For sunlight, the Annual Probable Sunlight Hours (APSH) method is also provided.
- 6.4.18 There are also two amenity spaces which form part of the Origin/Hill development therefore these have also been included in the assessment with regards to overshadowing of gardens or open spaces.

Impact to 21-39 Nightingale Court & Lyon Square

- 6.4.19 Nightingale Court is located 40m east of the proposed development and comprises a four storey residential block. Impacts to daylight and sunlight were negligible. The Lyon Square 12 storey block located to the south west of the site, however due to the angle of this block the nearest units (to the north and east elevations) would face away from the site and would be limited to oblique views of the proposal. This impact would also therefore be negligible. AY concurred with these results.

'Bank House' & Belgrave Court

- 6.4.20 Bank House has not been assessed as this forms a commercial block. Belgrave Court is a four storey block of flats located beyond 'Bank House'. The primary elevations face away from the site and the secondary windows on the northern façade would be masked by Bank House. Whilst there are 2 deviations from some central rooms, which reduce from 0.8 times to 0.7 times. This is considered to be largely unnoticeable and therefore acceptable. This notion is agreed by the LPA's consultant.

Block C (Origin/Hill Development)

- 6.4.21 Due to the proximity of the subject site and low density of the building the existing windows of this proposals benefit from high existing daylight levels. In terms of daylight, the target BRE recommendation for Average Daylight Factor (ADF) is 1.5% for a main living space. Of the 11 main living rooms (100 living rooms; 11 studios), 99 would continue to meet the criteria. Where these are not met the deviations are considered to be minor (0.1-0.3% below). Greater deviations are restricted predominantly to bedrooms located beneath balconies or isolated to larger open plan studios where the main living space closest to the windows would remain daylit. The BRE guidance recognises that a degree of flexibility must be applied to ensure development can match the heights and proportions of existing buildings, and that the scale and mass of the current proposals are comparable to the neighbouring and emerging context within the town centre location. The review sites comparable relationships between developments in Harrow including 55-59 Palmerston Road (P/2555/18); Equitable House and Lyon House (P/3118/11); and Sonia Court, Gayton Road (P/0291/16); all of which were granted under similar circumstances and in some instances the proposed development would have more or a positive impact than these developments.
- 6.4.22 In reviewing the results, AY have stated that: *"it is important to bear in mind that any efficient use of the proposed development site for dense redevelopment of this nature will inevitably involve a degree of effect, especially where the existing/consented neighbours are close to the boundary and are self-obstructed, as predicted by the BRE guidance."* As a result of the amendments the review concludes that there has been a reduction in the number of rooms not meeting the default recommendations, and a general overall improvement in the remaining habitable rooms (predominantly bedrooms) not achieving these. It was therefore concluded that these effects would be consistent with the nature of the proposed development and to an extent inevitable given the proposed change in massing, taking into account the design and location of the adjacent neighbours. A comparison of the initial and revised scheme, taken from AY's final review is shown below:



Sunlight & Overshadowing

- 6.4.23 In relation to the shared open amenity spaces at the Origin/Hill Scheme the eb7 assessment, demonstrated that all areas would continue to meet the BRE target sunlight levels particularly in the summer months when the amenity areas are likely to be heavily used.
- 6.4.24 In summarises their view of the results, Avison Young note that the assessments show in overall terms that there would be insignificant impacts, which are either unnoticeable or remain in excess of the default recommendations post-development. Although AY identified that some additional assessments of the Origin/Hill development would be advisable in order to fully assess the impact to this property. A plan showing the scope of works was provided and found to be acceptable. Whilst a small number of self-obstructed areas of directly adjacent habitable rooms serving Origin/Hill development would experience a greater degree of impact, AY note that this is considered inevitable if making efficient use of the proposed development site, due to their own self-limiting design and location directly adjacent the site boundary. This is predicted by the BRE guidance as inevitable in such situations.
- 6.4.25 To justify the identified harm to the sunlight and daylight levels within the neighbouring development the applicant's consultant have undertaken a mirror massing study as an alternative assessment which is recognised by the BRE as an appropriate tool where you are building close to a boundary, the results of this approach deem the daylight and sunlight levels of the neighbouring development acceptable. Avison Young within their independent assessment confirm that the BRE Guidelines note that in certain situations it may be useful to consider alternative target values in relation to daylight and sunlight. One of the alternative target criteria provided by the BRE Guidelines is a 'mirror image' approach which is used to understand the levels of daylight (VSC) and sunlight (APSH) that would be experienced by an extant neighbouring property if there were a building of the same height and extent opposite. This review was conducted and the results show similar or improved situations if this were the case. The applicants have also provided a comprehensive set of comparative /supplementary assessments which AY consider to robustly demonstrate that the degree of impact is common in comparable situations and further the proposal would meet alternative targets established by the approaches set out in the BRE guidance.

6.4.26 With consideration of the submitted details by the applicant, and the independent assessment undertaken, officers consider on balance the daylight and sunlight impacts to neighbouring properties is considered acceptable.

6.5 **Traffic, Parking, Access, Servicing and Sustainable Transport**

6.5.1 The relevant policies are:

- The London Plan (2021): T4, T5, T6
- Harrow Core Strategy (2012): CS1
- Harrow Development Management Policies Local Plan (2013):DM1, DM42
- Supplementary Planning Document: Planning Obligations and Affordable Housing (2013)

6.5.2 This site is located in an area of very good public transport accessibility with a rating of 6A (excellent). There is access to Harrow on the Hill station within walking distance where there are Underground and national rail services. Harrow bus station is adjacent offering a wealth of routes serving the local area and beyond enabling connections to other towns and more rail/tube options. The surrounding area has good pedestrian facilities due to the pedestrian priority zone in Station Road and St Ann's Road.

Trip Generation

6.5.3 Concerns have been raised by residents of the Origin development in particular of the impact the hotel development would have on car journeys. TfL note that the development is expected to generate 448 total person trips per day, with 77% of these trips being made by sustainable modes. This is a net reduction compared to the existing land use and is not expected to give rise to strategic public transport issues. This is in line with London Plan policies T1 and T4. The Highways Officer also notes that the ATZ Assessment is accepted and demonstrates that this proposal is not anticipated to be a problem as many journeys would fall outside of the normal highway peak times. The difference between the use of the site as a library and as a hotel is that being in the town centre, it is likely that trips to the library would have been linked to trips to other destinations in the town meaning that some of these journeys would still exist on the network but not associated with this site. This part of Harrow has excellent public transport provision; therefore, it is not considered that the increase would be detrimental as the trips would be spread across the different options available.

6.5.4 An Active Travel Zone Assessment was undertaken and concludes that the main trips attractors in this area are business and tourist destinations. The pedestrian access improvements between the site and St John's Road footway are an improvement compared to the site's current layout. The existing public realm on St John's Road is of good quality, and is stopped up at its northern end, creating a low traffic local environment. This supports the Mayor's Vision Zero agenda. A Healthy Streets Assessment has been prepared in line with Policy T2 of the London Plan. Given the public realm proposals adjacent to the site (public square improvements

at the junction of Lyon Road and St Johns Road); this is supported and will directly benefit the site in line with LP policy T2.

Parking

- 6.5.5 In line with policy T6.4 of The London Plan (2021), the development should only provide parking in relation to its operational needs, disabled persons parking and parking required for taxis, coaches and deliveries/servicing. The Highways Authority considers the proposed single disabled bay to be a low quantum and more should be provided for the 140 rooms and restaurant proposed. The on-street disabled bays in the vicinity of the site (all on St John's Road and Lyon Road) have a maximum period of use of three hours albeit, the signing is incorrect, therefore, will not be suitable for hotel guests. The Transport Assessment suggests that guests could use the Davy House public car park, however, the Council's lease of this car park is due to expire therefore, it is not guaranteed that it would be available publicly in the future. However, it is noted that the policy T6.5 also states that all non-residential development types should provide at least one on or off-street disabled parking bay and given the constraints and compliance with policy it is considered that this quantum is sufficient.
- 6.5.6 Whilst the analysis in the Transport Assessment is welcomed, there is an assumption that blue badge holders would book adapted rooms however, this is not necessarily the case as there are many disabled people who would not require any adaptations and so would use a standard room. In comparison, the Travelodge Hotel in Greenhill Way has two disabled bays for 101 rooms, this site should provide at least the same considering more rooms are proposed. The Premier Inn Wembley Park hotel has at least 4 disabled bays, has 154 rooms and is within a similar PTAL (5 forecast to be 6a). However, due to the constraints of the site, the single disabled bay is considered to be appropriate in this case. The updated Transport Assessment provides evidence to state that only 3.78% of bookings in similar locations (high PTAL in Greater London) were for accessible rooms, which equates to 1 disabled guest when assessed against the proposed quantum of rooms. As such, it is considered that the single space would be acceptable.

Cycle Parking

- 6.5.7 All proposals must include cycle parking provision in line with London Plan 2021 minimum requirements. The level of cycle parking is compliant with London Plan policy T5 however further detail on the type of stands proposed and the access/layout of the stores is required. A minimum of 5% must be accessible stands and ideally lockers should also be provided. This information should be secured by condition.

Delivery and Servicing

- 6.5.8 Policy T7 G does state that provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. This is a busy location where there will be demand for the use of the loading bay by others. It would be necessary to consider alternative options should this facility be in use when a delivery arrives as it will not be possible to wait on-street. A Deliveries and Servicing Plan (DSP) has been submitted and commits to sustainable delivery and servicing of the site. The servicing is off street and on-street, accessed from an existing servicing bay on St John's Road. Waste servicing and hotel deliveries would be undertaken via the on-site servicing bay, coach drop-offs and taxis will utilise the on-street bay this largely meets the objectives London Plan Policy T7.
- 6.5.9 Additionally, although not specifically a highways consideration, the noise generated by deliveries may have an impact on the residents living in Byron Court therefore timings should be carefully considered. A detailed construction logistics plan is therefore recommended to be secured by pre-occupation condition.
- 6.5.10 It is therefore considered that the proposed development is acceptable in Highway terms and would accord with policies T2, T4, T5, T6, T6.4 of The London Plan (2021) and policies DM1 and DM42 of the Harrow Development Management Policies Local Plan (2013), on the basis that if planning permission was granted it would be subject to the abovementioned conditions. Furthermore, the Highways Officer and TFL raised no objection to the proposed development.

6.6 Environmental Considerations – Contamination, Noise, Air Quality

6.6.1 The relevant policies are:

- The London Plan (2021): S11, D14
- Harrow Core Strategy (2012): CS1.U
- Harrow Development Management Policies Local Plan (2013):DM1, DM12 DM15

Contamination

Policy DM15 (Prevention and Remediation of Contaminated Land) of the Harrow Development Management Policies (2013), specifically Part A, which proposes the redevelopment or re-use of land known or suspected to be contaminated and development or activities that pose a significant new risk of land contamination will be considered having regard to:

- a. the findings of a preliminary land contamination risk assessment;
- b. the compatibility of the intended use with the condition of the land; and
- c. the environmental sensitivity of the site.

Part B of Policy DM15 confirms proposals that fail to demonstrate that intended use would be compatible with the condition of the land or which fail to exploit appropriate opportunities for decontamination will be resisted.

- 6.6.2 The submitted sustainability statement confirms that should any discovery of potentially contaminated soils or materials be found this should be reported and any mitigation required would be subject of review by the LPA. Conditions to this effect are therefore recommended.

Noise

- 6.6.3 Paragraph 109 states that planning decisions should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.
- 6.6.4 London Plan policy D14 seeks to reduce, manage and mitigate noise to improve health and quality of life. The policy states that residential development proposals should manage noise by a range of measures which include reflecting the Agent of Change principle as set out in Policy D13, mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses and improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity). The policy advocates separating new noise-sensitive development from major noise sources through the use of distance, screening, layout, orientation, uses and materials – in preference to sole reliance on sound insulation and states that where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles.
- 6.6.5 A Noise Impact Assessment has been submitted as part of the planning application, and the environmental health officer and does not consider the information supplied sufficient. This is because the background noise levels were assessed during the construction of the Origin/Hill development and do not reflect noise levels post occupation of these units. Furthermore, noise and odour control assessments and measures have not been accounted for. Whilst such details are usually required prior to determination, it is considered given the passage of time since the submission of this application a revised noise report can be appropriately conditioned. To ensure noise from the conference rooms and ancillary restaurant / bar area are not in considerable excess of background levels, a condition restricting amplified noise from the site is also considered necessary to safeguard the amenity of neighbouring residents.
- 6.6.6 As mentioned above, details of background levels post-construction during the quieter periods has been requested by the EH Officer to ensure appropriate mitigation measures would be in place should they be deemed necessary. However, the applicant states that their noise assessment measures the 'worst case scenario' and anything less than this would be an improvement. The LPA does not consider construction period noise to provide a true reflection of normal background levels and therefore further work would be necessary to ensure appropriate mitigation (if necessary) is provided. A condition to this effect will be included. Plant noise details are required once these become available and these should be no more than the

ambient levels at night-time. These details will also be secured by way of condition to ensure they are acceptable.

- 6.6.7 The Delivery and Service Plan sets out the frequency and duration of deliveries which would take place per week. A condition to ensure that deliveries would be limited to 14 per week as set out in figure 3.2 of the plan between 06.30-18:00 for the durations set out would ensure noise levels and disturbance to nearby occupiers would be at acceptable levels.

Air Quality

- 6.6.8 Harrow is within an 'Air Quality Management Area (AQMA) due to the exceedance of the annual and hourly mean Nitrogen Dioxide and the 24 hours mean small airborne particles.

London Plan policy SI 1 (Improving air quality) Part 1 states that:

"Development proposals should not:

- a) lead to further deterioration of existing poor air quality
- b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits
- c) create unacceptable risk of high levels of exposure to poor air quality."

Part 2 of the policy sets out requirements to ensure that development proposals meet the above objectives including the requirement for developments to be Air Quality Neutral.

- 6.6.9 The Air Quality Assessment has been updated by XCO2 to reflect the amendments to the proposed development. The conclusions of the assessment remain the same, with the report noting that there would be some insignificant impacts during the construction phase which can be effectively minimised through the implementation of a Dust Management Plan. The report also notes that the development will reduce traffic on the local road network compared to the existing site uses and the impact on local air quality is therefore anticipated to be negligible. There is also a minor improvement over the previously submitted scheme due to the reduction in room numbers.
- 6.6.10 The assessment has also undertaken detailed dispersion modelling to assess the suitability of the site for a hotel use and concluded that the predicted concentrations at the site are well within the short-term quality standards set for the protection of health. The report also states that the proposed development will be Air Quality Neutral in respect of both building and transport-related emissions. The scheme would therefore comply with air quality standards.

Lighting

- 6.6.11 The application does not include any details of the lighting strategy for the scheme, as such, if members grant planning permission for the scheme, a condition to confirm the security and ambient lighting of the proposal with the on and off-site impacts identified and quantified.

6.7 Development and Flood Risk

6.7.1 The relevant policies are:

- The London Plan (2021): SI13
- Harrow Core Strategy (2012): CS1
- Harrow Development Management Policies Local Plan (2013): DM1, DM9, DM10

6.7.2 The application site is identified within fluvial flood zone 1 which is not at risk from fluvial flooding and therefore the development is considered to be able to be operated safely with no increased level of flood risk.

6.7.3 The Drainage Department was consulted who confirmed that the flood risk assessment and drainage strategy submitted is acceptable, however further details in respect of surface water flooding and compensatory flood storage are required alongside the flood mapping. At the time of writing this report the applicants Drainage Consultant has confirmed that the outstanding information requested by the Council is collated and will be shared by way of addendum. The Drainage Officer has confirmed this approach is appropriate.

6.8 Biodiversity

6.8.1 The relevant policies are:

- The London Plan (2021): G5, G6
- Harrow Core Strategy (2012): CS1
- Harrow Development Management Policies Local Plan (2013): DM1, DM20, DM21

6.8.2 The Biodiversity Officer was consulted on the proposal and advised the application site is within a significant area of deficiency in access to nature. The large and important Harrow on the Hill site is the closest within 500 metres it is separated from the site by the rail line and significant urban development. Accordingly, the scheme would have no impact on this or other wildlife sites but it would be expected that the development will provide improvements in access to nature and the benefits which this can bring as a measurable gain for biodiversity.

6.8.3 The Council's Biodiversity Officer has reviewed the proposals and considers that whilst there is little opportunity to provide enhancement for biodiversity within urban areas, a sedum-dominated roof (as suggested for the lower roof) will not be acceptable and provision should be made instead for a biodiverse roof with at least 15cm of nutrient poor substrate, water retention and other features to support a diverse flora and the invertebrate species that this would encourage. Although the drainage plan does not appear to mention the indicated green roof section at first floor level, the biodiverse roof provision will need to be designed and delivered to help to mitigate projected climatic change. Specialist living roof consultancies would be able to advise as to what is likely to be suitable in this regard. Consideration of vegetation provision at ground level seems deficient and additional trees and trees within tree pits rather than the indicated planters and or

(simple) green walls or the use of climbers grown over supporting structures may be better suited, including green walls at split roof levels. As no definitive proposals have been put forward nor the requirements to meet Urban Greening Factor a condition setting a full specification of on-site proposals, including provision of wildlife shelters are required by way of pre-commencement condition.

- 6.8.4 Such details identified above would be required and there is a need for a plan relating to the installation and establishment of the identified features and for their management in the long term. Therefore, subject to appropriate conditions the biodiversity officer has raised no objection to the proposed development and the provision of green and bio-solar roof spaces and suitable wildlife shelters should provide welcome benefits for wildlife and help contribute to access to nature.

6.9 Energy and Sustainability

- 6.9.1 The relevant policies are:

- The London Plan (2021): SI1, SI2, SI5
- Harrow Core Strategy (2012): CS1
- Harrow Development Management Policies Local Plan (2013): DM1, DM12, DM14
- Harrow and Wealdstone Area Action Plan (2013): AAP10

- 6.9.2 An Energy Statement has been prepared by XCO2. The methodology used in the report remains in accordance with the London Plan's four-step Energy Hierarchy of Be Lean, Be Clean, Be Green and Be Seen.

- 6.9.3 The site is in a Heat Network Priority Area and ambient loop heat networks are not considered readily compatible with future connection to district heating. As part of an addendum the revised Energy Statement states that air source heat pumps will form part of a hybrid system for the supply of heating and hot water, alongside the boilers with an approximate 60% and 40% split. Photovoltaic Panels have also been identified as a suitable technology for the site. The report demonstrates that there is a significant saving of 32.4% using SAP10 at the Be Green stage. This will be further reviewed at Stage 2 by the GLA should this application be granted.

- 6.9.4 The report notes that there is no district heating system for the proposed development to connect to, meaning there are no savings to be achieved at the Be Clean stage.

- 6.9.5 The report states the proposed energy efficiency measures at the Be Lean stage include levels of insulation beyond the Building Regulation requirements, low air tightness level, efficient lighting and energy saving controls for space conditioning and lighting. These measures alone reduce the CO2 emissions at the Be Lean stage. By 10.1% using SAP10 and 12.9% using SAP2012. The target for the Be Lean stage is a 15% saving, which the development cannot achieve due to the significant demand for hot water and the associated emissions. Furthermore, any improvement to the building fabric, lighting systems, ventilation systems and building services systems controls will only have a negligible impact on the achievable savings.

- 6.9.6 At the Be Green stage the overall results are 42.5% improvement for the proposed for the non-residential use over Part L using the SAP10 factors in accordance with London Plan policies.
- 6.9.7 The development follows the energy hierarchy, heating hierarchy, and cooling hierarchy. The development will connect to the energy centre at a neighbouring site as soon as it is available, which results in significant carbon reductions. In addition, the PV system is the largest that the roof can accommodate.
- 6.9.8 The planning policy officer has reviewed the proposal and considers that it broadly follows the energy hierarchy and includes supporting Part L Building Regulations calculations in the appendices. Overall carbon reductions savings equivalent to 42.5% of baseline emissions are identified in the statement (based on SAP 10.0 carbon factors); this is in excess of the minimum 35% on site reductions required in London Plan. Within the energy hierarchy, the proposed scheme does not meet the 15% reduction target for the 'Be Lean' stage (i.e. energy efficiency measures) but given the nature of the development (a hotel with a higher proportion of hot water demand) there is a reduced scope for energy efficiency measures; this shortfall is considered acceptable given the overall carbon reductions achieved on-site.
- 6.9.9 The statement also indicates that an on-site heat network (powered by air source heat pumps) will be provided; the ability for such a network to connect to a future district heat network is however not clear in the energy strategy (an issue raised by the GLA in their Stage 1 response). It is also noted that the Building Regulations 2021 have come into force and whilst transitional arrangements are available, the energy strategy should be updated to reflect the new Regulations (where appropriate) and any subsequent guidance issued by the GLA (i.e. GLA Energy Assessment Guidance 2022), as well as providing additional detail regarding future connection of the on-site heat network to any future district network should one become available.
- 6.9.10 The energy statement identifies remaining emissions of 157 tonnes per year that will need to be offset by way of an offset contribution secured by way of a S106 planning obligation in order for the development to achieve zero carbon development required under the London Plan. At the London Plan rate of £95/tonne/year for 30 years (i.e. £2,850 / tonne), the contribution is £498,750. The contribution should be payable prior to commencement of development and verified at the completion of development with a top-up payment required for any shortfall in on-site carbon reductions compared to those proposed at application stage. As a new energy statement will be conditioned, the S106 should be worded to allow recalculation of the contribution to take into account any revised energy statement approved by the LPA. GLA Be Seen requirements should also be included in any S106 agreement, as well as heat network safeguarding obligations.
- 6.9.11 Subject to the above obligations and condition, the proposal therefore complies with the above-mentioned policies.

6.10 **Secured by Design**

6.10.1 The relevant policies are:

- The London Plan (2021): D5, D11, E10
- Harrow Core Strategy (2012): CS1
- Harrow Development Management Policies Local Plan (2013): DM1, DM2

6.10.2 The Designing Out Crime officer had been in discussion with the applicant in relation to the scheme and come to an agreed position. Following the revised scheme, the applicants have however not followed through with the revisions and therefore officers have raised concern with the current ground floor layout. A letter addressing the key concerns was submitted by Whibread, however it is considered necessary to include a condition requiring a revised ground floor layout to ensure all the appropriate secure by design measures are implemented. This would ensure that the development would achieve Secured by Design (SBD) certification prior to occupation. On that basis, the proposal therefore complies with the above-mentioned policies. This position has been agreed with Secure by Design Officers.

6.11 **Fire**

6.11.1 The relevant policies are

- The London Plan (2021): D5, D12

6.11.2 Policy D5 'Inclusive Design' and Policy D12 'Fire Safety' of the London Plan (2021) seeks for all developments to meet the highest standards of fire safety and requires all major developments to include the submission of a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.

6.11.3 The Fire Statement submitted has been reviewed by the Council's Fire Consultant. It was considered that the statement is broadly acceptable in principle, however there is insufficient information at this stage to advise that the development should be carried out in accordance with the strategy. The guidance document upon which the statement is based was superseded last month and the relevant document is now ADBvol2 2022. Whilst there is not a large difference between the two documents there are still outstanding comments in relation to the escape routes. An updated Fire Strategy is therefore required by way of pre-commencement condition.

7.0 **CONCLUSION**

7.1 The statutory position is that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. The relevant policies have been set out within the report above.

7.2 In summary the proposals are considered to be in accordance with the objectives of the London Plan (2021), Harrow Core Strategy (2012), and Harrow Development Management Policies (2013), and the National Planning Policy Framework (2021).

- 7.3 Accordingly, it is recommended that planning permission be granted for application reference P/3066/20, in line with Recommendation A of this report, and subject to the completion of a s.106 agreement, and the conditions listed in Appendix 1.

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|--|------------|
| Interim Head of Development Management | 06/07/2022 |
| Corporate Director | 07/07/2022 |

APPENDIX 1: Conditions and Informatives

Conditions

1. Time Limit

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990.

2. Plan List

Save where varied by other planning conditions comprising this planning permission or unless otherwise agreed in writing by the local planning authority, the development hereby permitted shall be carried out in accordance with the following approved plans to show the redevelopment to provide a part single part 12 storey hotel accommodation (Use Class C1) comprising 140 rooms and construction of basement level; ancillary restaurant and conference rooms (Use class E); bin store; landscaping; parking (demolition of existing building)

Approved Plans:

Principle elevation visualization; 6240_SITE_2D_R0;
7240_LOWER_GROUND_R0; 7240_GROUND_R0; 7240_FIRST_R0;
7240_SECOND_R0; 7240_THIRD_R0; 7240_FOURTH_R0; 16A; 15C; 14C;
13C; 12B; 11C; 08D; 07D; 06D; 05D; 04D; 03E; 02F; 01D; M788_001.PPL1

Approved Documents:

Flood Risk Assessment & Drainage Strategy (prepared by Simpson) dated November 2021; Fire Statement (Prepared by C.S Todd & Associates Ltd) dated December 2021; Energy Statement (prepared by XCO2 dated November 2021); Delivery and Servicing Management Plan (prepared by RGP, dated November 2021); Healthy Streets Transport Assessment (prepared by RGP, dated November 2021); Travel Plan (prepared by RGP, dated November 2021); Daylight & Sunlight Report (prepared by eb7, dated November 2021); Environmental Noise and Impact Assessment (prepared by XCO2, dated November 2021); Overheating Assessment Addendum (prepared by XCO2); Sustainability Statement Addendum (prepared by XCO2); Air Quality Assessment (prepared by XCO2, November 2021); Pedestrian level wind microclimate assessment (prepared by RWDI, dated November 2021); Supplementary Design and Access Statement (Prepared by SKD Design Ltd); Structural Method Statement (December 2020); Sustainability Statement (December 2020); Drainage Strategy Report (prepared by Simpson); Economic Benefits Statement (July 2020) prepared by Turley; Planning Statement (prepared by HGH Consulting); Design and

Access Statement; GLA Carbon Emission Reporting Spreadsheet; Planning Statement Addendum (December 2021); Travel Plan (prepared by Whitbread dated November 2021).

REASON: In the interests of good planning and to ensure that the development is carried out in accordance with the approved documents, plans and drawings submitted with the application and is acceptable to the local planning authority.

3. Construction Logistics Plan

No development shall take place, including any works of demolition, until a Detailed Construction Logistics Plan has been submitted to, and approved in writing by, the local planning authority in accordance with the format and guidance provided by Transport for London – www.tfl.gov.uk. The Detailed Construction Logistics Plan shall provide for:

- a) Parking of vehicles of site operatives/visitors;
- b) HGV access to site – loading and unloading of plant and materials;
- c) Number of HGV's anticipated;
- d) Storage of plant and materials used in constructing the development;
- e) Programme of work and phasing;
- f) Site layout plan;
- g) Highway condition (before, during, after);
- h) Measures to control dust and dirt during construction;
- i) A scheme for recycling/disposing of waste resulting from demolition and construction works; and
- j) details showing the frontage/ the boundary of the site enclosed by site hording to a minimum height of 2 metres.

The development shall be carried out in accordance with the approved Detailed Construction Logistics Plan, or any amendment or variation to it as may be agreed in writing by the local planning authority.

REASON: To minimise the impacts of construction upon the amenities of neighbouring occupiers and to ensure that development does not adversely affect safety on the transport network in accordance with Local Plan Policies DM1 and DM43 and Policy D14 of the London Plan (2021) and to ensure that the transport network impact of demolition and construction work associated with the development is managed in accordance with Policy T7 of the London Plan (2021), this condition is a PRE-COMMENCEMENT condition.

4. Levels

No site works or development shall commence until details of the levels of the building(s), road(s) and footpath(s) in relation to the adjoining land and road/highway(s), and any other changes proposed in the level of the site, have been submitted to, and agreed in writing by the local planning authority. The development

shall be carried out in accordance with the details so agreed.

REASON: To ensure that the works are carried out at suitable levels in relation to the highway and adjoining properties in the interests of the amenity of neighbouring residents, the appearance of the development, drainage, gradient of access and future highway improvement in accordance with policies DM1 and DM42 of the Harrow Development Management Policies Local Plan (2013).

5. Revised Noise Report

The development hereby approved in relation to criterion a), b), c) and d) shall not commence until details noted below have been submitted to and approved in writing by the local planning authority:

- a) Updated Noise Assessment of background noise level;
- b) full details (including specification) of any extraction flues, plant/ ventilation systems, rainwater disposal systems (including downpipes) and any rollershutters, gates and other means of controlling access to the building.
- c) details to demonstrate that all plant/ ventilation systems would meet the plant noise criteria set out in the submitted Noise Assessment.
- d) measures to be incorporated within the design of the buildings to minimise excessive noise breakout from the proposed community hall and commercial floorspace (including details of any mechanical ventilation that would be required); and
- e) a follow up acoustic survey to demonstrate installed plant compliance shall be submitted within six months of the first occupation of the development.

The application shall be implemented in full accordance with such details and be maintained thereafter.

REASON: To ensure that potential adverse noise impacts to residential premises within the development are mitigated.

6. Noise emanating from the ancillary uses

The development shall not progress beyond damp proof course level until a scheme which specifies the provisions to be made for the control of noise emanating from the ancillary restaurant / bar use has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include such combination of physical, administrative measures, noise limits and other measures as may be approved by the Local Planning Authority. Thereafter, the scheme shall be implemented and maintained in full compliance with the approved measures.

REASON: To safeguard the amenity of the locality and to ensure a satisfactory form of development.

7. Secure by Design

No development other than demolition works shall commence until a revised ground floor layout which provides measures to maintain a safe and secure environment for users and staff of the development shall be submitted to and approved by the LPA. The development shall be completed in accordance with these details and thereafter maintained.

REASON: In the interests of creating safer and more sustainable communities and to safeguard amenity by reducing the risk of crime and the fear of crime in accordance with policy D11 of the London Plan (2021) and policy DM1 of the Development Management Policies Local Plan (2013).

8. Urban Green and Ecological Management Plan

No development, other than works of demolition shall commence at the site before an Urban Greening and Ecological Management Plan has been submitted to and approved in writing by the Local Planning Authority.

- 1) The Urban Greening and Ecological Management Plan shall include:
 - a) Details of the measures to be provided at the site to deliver an Urban Greening Factor of at least 0.4 (or as far as practicable);
 - b) Full details of proposals to incorporate built-in and other shelters for birds, bats and invertebrates at ground to third floor, split root and roof and elevation apex levels at a ratio of one single/dual shelter per two accommodation units. This should include provision of hibernation roosts for bats, including provision of features for peregrine falcon should also be considered and pursued if practicable;
 - c) A timetable for the delivery of the urban greening measures and ecological enhancements at the site;
 - d) A Management and Maintenance Plan for the urban greening measures and ecological enhancements at the site.
- 2) Prior to first use, the applicant will provide to the Council for approval in writing a maintenance and management plan for the features identified with the plan above, as approved, to continue on for a period of ten years from the conclusion of that plan and then to be refreshed at 5- 10 year intervals. The plan should provide clear instructions and clear, 'at a glance', month-by-month and year by calendars of operations and monitoring to guide the implementation of works by those responsible for their delivery or oversight.

The development shall be carried out in accordance with the approved details.

REASON: To ensure that a satisfactory urban greening factor and onsite ecological enhancements are provided and managed and maintained at the site.

9. Surface Water Attenuation

The development of any buildings hereby permitted shall not be commenced until surface water attenuation and storage works have been submitted to, and approved in writing by, the local planning authority. To ensure that the necessary construction and design criteria for the development proposals follow approved conditions and for allowable discharge rates the applicant should contact Harrow Drainage Section at the earliest opportunity.

REASON: To prevent the increased risk of flooding, reduce and mitigate the effects of flood risk following guidance in the National Planning Policy Framework.

10. Fire Safety

Notwithstanding the submitted Fire Statement, the development hereby approved shall not progress beyond damp proof course, until a Fire Safety Strategy produced by a third party suitably qualified assessor shall be submitted to and approved in writing by the Local Planning Authority, this statement shall include details of how the development will function in terms of the following:

- 1) identify suitably positioned unobstructed outside space: a) for fire appliances to be positioned on b) appropriate for use as an evacuation assembly point
- 2) is designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures is constructed in an appropriate way to minimise the risk of fire spread
- 3) provide suitable and convenient means of escape, and associated evacuation strategy for all building users, including the provision of fire evacuation lifts;
- 4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users, including the provision of fire evacuation lifts;
- 5) develop a robust management strategy for evacuation which is to be periodically updated and published (details of how often this management strategy is to be reviewed and published to be included), and which all building users can have confidence in
- 6) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

The development shall be operated in accordance with the approved details in perpetuity.

REASON: To ensure that the fire safety of the proposed building is managed in a satisfactory manner and that the development contributes to fire safety in line with Policy D12.B of the London Plan (2021). To ensure appropriate fire safety measures are approved before development commences on site, this condition is a PRE-COMMENCEMENT condition.

11. Contamination

No demolition shall take place until a scheme ('the first scheme') for identifying, managing and disposing of any potential contamination hazards found during demolition of the existing buildings and structures on the site has first been submitted to, and agreed in writing by, the local planning authority. No development other than demolition shall take place until a scheme ('the second scheme') for the management of contamination risk at the site has first been submitted to, and agreed in writing by, the local planning authority. The second scheme shall include the following:

1. details of a site investigation to provide information for a detailed assessment of the risks to all receptors that may be affected, including those off site;
2. the results of the site investigation and an options appraisal and remediation strategy giving full details of remediation measures and how they are to be undertaken; and
3. a verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy are complete and identifying any requirements for longer-term monitoring of pollutant leakages, maintenance and arrangements for contingency action.

The demolition works shall be carried out in accordance with the first scheme so agreed. The development other than demolition shall be carried out in accordance with the second scheme so agreed.

REASON: To ensure that the development does not activate or spread potential contamination at the site and that the land is appropriately remediated for the approved uses, in accordance with policy DM15 of the Harrow Development Management Policies Local Plan (2013).

12. Revised Energy Strategy

No development shall take place until a revised energy strategy has first been submitted to the Local Planning Authority in writing to be agreed. The details of the revised energy strategy will include full Part L calculations based on the version of Part L of the Building Regulations that the scheme will be implemented under.

The approved details shall be installed on site before the occupation of the development and shall be maintained thereafter.

REASON: To ensure the delivery of a sustainable development in accordance with the National Planning Policy Framework (2021), policies S2 of The London Plan (2021) and policies DM12, DM13 and DM14 of the Harrow Development Management Policies Local Plan (2013).

13. Materials

Notwithstanding the details shown on the approved drawings, the development hereby approved shall not progress beyond damp proof course level until samples of the materials (or appropriate specification) to be used

in the construction of the external surfaces for each building, noted below have been submitted to, and agreed in writing by, the local planning authority:

- a) facing materials for the building, including brickwork bond details;
- b) windows/ doors, including those to all servicing areas;
- c) privacy screens (including soffits);
- d) boundary treatment including all vehicle and pedestrian/ access gates;
- e) ground surfacing; and
- f) raised planters;
- g) external seating.

The development shall be carried out in accordance with the details so agreed and shall be retained as such thereafter.

REASON: To safeguard the appearance of the locality and to ensure a satisfactory form of development.

14. Noise, Odour and Ventilation

The development hereby approved in relation to criterion a) and b) below, shall not progress beyond damp proof course level until details noted below have been submitted to and approved in writing by the local planning authority:

- a) full details (including specification) of any extraction flues, plant/ ventilation systems, rainwater disposal systems (including downpipes) and any rollershutters, gates and other means of controlling access to the ancillary / back of house areas within the site;
- b) details to demonstrate that all plant/ ventilation systems would meet the plant noise criteria set out in the submitted Environment Statements;
- c) details to demonstrate that odour control measures would be in place, where it is found necessary; and
- d) a follow up acoustic survey to demonstrate installed plant compliance shall be submitted within six months of the first occupation of the development.

The application shall be implemented in full accordance with such details and be maintained thereafter.

REASON: To ensure that potential adverse noise impacts to residential premises within the development are mitigated.

15. Hard and Soft Landscaping

Notwithstanding the approved details, the development hereby permitted shall not progress beyond damp proof course level, until a scheme for detailed hard and soft landscaping of the development, to include details of the planting, hard surfacing materials, external furniture and structures, tree planting and tree pits and so on has been submitted to, and approved in writing by the Local Planning Authority which shall include:

- a) Soft landscaping works shall include: 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 an implementation programme.
- b) The hard surfacing details shall include samples to show the texture and colour of the materials to be used and information about their sourcing/manufacture.
- c) Green roofs, biodiverse intensive and extensive green roofs to include the planting and green roof detail, build-up layers of the material, including the substrate, growing medium, drainage, irrigation and written specification of planting, schedules of plants, noting species, plant sizes, types of vegetation (all at time of planting) proposed numbers / densities. The layout of the roof above 14th storey to incorporate a brown roof and blue roof with PV panels combined.
- d) Details of all boundary treatment.
- e) Lighting: details of the lighting of all external areas (including buildings) within the site, including locations, lighting design, lighting details, specification, elevations, light spillage and lighting levels;
- f) Details of suitable planting to provide appropriate mitigation for the worst-affected areas in line with the recommendations of the Wind Microclimate Assessment

The development shall be implemented in accordance with the scheme so agreed and shall be retained as such thereafter. The brown roof shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair.

REASON: To ensure that the development makes provision for hard and soft landscaping which contributes to the creation: of habitats and valuable areas for biodiversity; a high quality, accessible, safe, and attractive public realm and to ensure a high standard of design, layout and amenity, in accordance with policies D3, G5 and G7 of The London Plan (2021) and policies DM1, DM21 and DM22 of the Harrow Development Management Policies Local Plan (2013).

16. Landscape Management and Maintenance Plan

The development hereby approved shall not be first occupied until a Landscape Management and Maintenance Plan has been submitted to and approved in writing by the Local Planning Authority, for all hard and soft landscapes areas, other than privately owned domestic balconies/terraces/gardens. The Landscape Management and Maintenance Plan shall include:

- a) Landscape Management: long term design objectives incorporating the overall functional aesthetic objectives of the landscape scheme; management responsibilities; programme of works and monitoring procedures; and
- b) Landscape Maintenance: including routine physical tasks required to satisfy appropriate standards of aftercare and enable the design and implementation objectives to be achieved, for the first year of maintenance, years 2-5 and 6 years onwards: maintenance responsibilities; a schedule of maintenance operations (calendar of tasks) set out graphically and in writing.

The Landscape Management and Maintenance Plan shall be carried out in accordance with the approved details.

REASON: To ensure the future success of the development and to enhance the appearance of the development, in accordance with policies D3, G5 and G7 of The London Plan (2021) and policies DM1 and DM22 of the Harrow Development Management Policies Local Plan (2013).

17. Planting

All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the occupation of the building(s), or the completion of the development, whichever is the sooner. Any existing or new trees or shrubs which, within a period of 5 years from the completion of the development, die, are removed, or become seriously damaged or diseased, shall be replaced in the next planting season, with others of a similar size and species, unless the Local Planning Authority agrees any variation in writing.

REASON: To safeguard the appearance and character of the area, and to enhance the appearance of the development, in accordance with policies D3, G5 and G7 of The London Plan (2021) and policies DM1, DM22 and DM23 of the Harrow Development Management Policies Local Plan (2013).

18. Appearance of the buildings

Other than those shown on the approved drawings, no soil stacks, soil vent pipes, flues, ductwork or any other pipework shall be fixed to the elevations of the building hereby approved.

The development shall be implemented in accordance with the approved details and shall be retained as such thereafter.

REASON: To ensure that the development is carried out to the highest standards of architecture and materials in accordance with Policy D4 of the London Plan (2021), Policy CS1B of the Harrow Core Strategy (2012) and Policies AAP4 and AAP6 of the Harrow and Wealdstone Area Action Plan 2013.

19. Delivery and Servicing Plan

The hotel and ancillary restaurant premises hereby approved shall not be first occupied until a detailed Delivery and Servicing Plan has first been submitted to the Local Planning Authority in writing to be agreed. The delivery and service plan shall be carried out in accordance with the approved details for the lifetime of the development and details in relation to trip generation and time periods for deliveries as set out in the approved plan shall not be exceeded, unless otherwise approved in writing by the LPA.

REASON: To ensure that the transport network impact of deliveries associated with non-residential uses within the development is managed in accordance with Policy T7 of the London Plan (2021) and policy DM44 of the Harrow Development Management Policies Local Plan (2013).

20. Secure by Design

Prior to the first occupation of the building, the applicant shall apply for a Secured by Design Certification which shall be submitted and approved in writing by the local planning authority. Secure by design measures shall be implemented where practical and the development shall be retained in accordance with the approved details.

REASON: In the interests of creating safer and more sustainable communities and to safeguard amenity by reducing the risk of crime and the fear of crime

21. Building Maintenance

The development hereby approved shall not be occupied until a strategy for maintaining the external surfaces of the buildings has first been submitted to and agreed in writing by the Local Planning Authority. The strategy shall include details of the regime for cleaning, repainting and repairing the buildings and the logistical arrangements for implementing that regime. Maintenance of the external surfaces of the buildings shall adhere to the strategy so agreed.

REASON: To ensure that maintenance of the development is carried out to preserve the highest standards of architecture and materials in accordance with Policy D4 of the London Plan (2021) and Policies AAP 4 and AAP 6 of the Harrow and Wealdstone Area Action Plan 2013.

22. Television Reception

Prior to the first occupation of the development, details of a strategy for the provision of television reception (eg. aerials, dishes and other such equipment) shall be submitted to and agreed in writing by the Local Planning Authority. Such details shall include the specific size and location of all equipment. The approved details shall be implemented prior to the first occupation of the relevant phase and shall be retained thereafter. No other television reception equipment shall be introduced onto the walls or the roof of the building without the prior written approval of the Local

Planning Authority.

REASON: To ensure that any telecommunications apparatus and other plant or equipment that is required on the exterior of the buildings preserves the high quality design of the buildings and spaces in accordance with Policy 7.4 of the London Plan (2016), Policy AAP 4 of the Harrow and Wealdstone Area Action Plan (2013) and DM 49 of the Development Management Policies Local Plan (2013), and to ensure that the development achieves a high standard of amenity for future occupiers the buildings in accordance with Policy DM 1 of the Development Management Policies Local Plan (2013).

23. Opening Hours

The opening hours of the ancillary restaurant (use Class E) hereby approved shall be as follows:

- 07:00 hours to 23:00 hours on Mondays to Saturdays (inclusive)
- 08:30 hours to 22:00 hours on Sundays and Bank Holidays

REASON: In order to safeguard the amenities of neighbouring residents in accordance with policy D15 of The London Plan (2021) and policy DM1 of the Harrow Development Management Policies Local Plan (2013).

24. Delivery Hours

Any deliveries within the development shall take place only between the hours of 06:30 and 23:00 on Mondays to Saturdays and between the hours of 08:30 and 22:00 on Sundays and Bank Holidays, unless otherwise agreed in writing by the local planning authority.

REASON: To ensure that the noise impact of deliveries associated with non-residential uses within the development is minimised and that the development achieves a high standard of amenity for future and the neighbouring occupiers.

25. Wheelchair Units

The 14 wheelchair hotel units shall be implemented as identified within the approved drawings.

REASON: To ensure sufficient choice for people who require an accessible bedroom within short-term let accommodation provision of 'Wheelchair and Accessible and adaptable' housing in accordance with policies E10 of The London Plan (2021).

26. Blue Badge Parking Spaces

The development hereby permitted shall not be occupied until the accessible parking space of a standard size have been clearly marked out on site, in accordance with the approved Site Plan (O1 D). Such spaces shall not be used for any purposes other than for the parking of motor vehicles used by residents of the development for blue badge holders/disabled persons only, and for no other purpose, unless otherwise agreed in writing by the Local Planning Authority.

REASON: To ensure car parking provision is available for use by the occupants of the site and in accordance with policy T6 of The London Plan (2021) and policies DM1 and DM42 of the Harrow Development Management Policies Local Plan (2013).

27. Cycle Parking

The development hereby permitted shall not be occupied until details of shelters, racks, dimensions and location of cycle parking spaces shall be submitted to and approved in writing by the local planning authority. Such cycle storage should be designed in accordance with the requirements of the London Cycle Design Standards. The development shall be completed in accordance with the approved details prior to the occupation of the residential units and shall thereafter be retained.

REASON: To ensure that cycle storage is available for use by the occupants of the site in accordance with policy T5 of The London Plan (2021) and policies DM1 and DM42 of the Harrow Development Management Policies Local Plan (2013).

28. PD Restrictions

The approved ground commercial space (Use Class E(b)) shall only be used for the purposes as set out in the application and for no other purposes.

REASON: To enable the Local Planning Authority to fully consider the effects of development normally permitted by the Town and Country Planning (General Permitted Development) Order 2015 to maintain mixed, balanced, sustainable and inclusive communities in accordance with policy D3 of the London Plan (2021) and policy DM1 of the Harrow Development Management Policies Local Plan (2013).

29. Amplified Noise

No music or any other amplified sound caused as a result of this permission shall be audible at the boundary of any residential premises either attached to, or in the vicinity of, the premises to which this permission refers.

REASON: To ensure that the proposed development does not give rise to noise nuisance to neighbouring residents.

30. Refuse Storage

The refuse bins shall be stored at all times, other than on collection days, in the designated refuse storage area, as shown on the approved drawing plans.

REASON: To safeguard the appearance and character of the surrounding area

INFORMATIVES

1. Relevant Policies

The following policies are relevant to this decision:

National Planning Policy Framework (2021)

The London Plan (2021):

D1, D2, D3, D4, D5, D8, D9, D11, D12, D13, D14, E1, E10, G5, G6, G7, SI1, SI2, SI12, SI13, SI15, SD6, SD7, SD8, SD9, T2, T4, T5, T6, T6.4 T8

Harrow Core Strategy (2012): CS1

Harrow and Wealdstone Area Action Plan (2013):

AAP1, AAP3, AAP4, AAP6, AAP9, AAP10, AAP16

Harrow Development Management Policies Local Plan (2013):

DM1, DM2, DM9, DM10, DM12, DM14, DM15, DM20, DM21, DM22, DM34, DM35, DM42, DM45

Supplementary Planning Documents:

Supplementary Planning Document: Planning Obligations and Affordable Housing (2013)

2. Pre-application engagement

Statement under Article 35(2) of The Town and Country Planning (Development Management Procedures) (England) Order 2015

This decision has been taken in accordance with paragraphs 187-189 of The National Planning Policy Framework. Pre-application advice was sought and provided and the submitted application was in accordance with that advice.

3. Mayoral CIL

Please be advised that approval of this application (either by Harrow Council, or subsequently by the Planning Inspectorate if allowed on appeal following a refusal by Harrow Council) will attract a Community Infrastructure Levy (CIL) liability, which is payable upon the commencement of development. This charge is levied under s.206 of the Planning Act 2008 Harrow Council, as CIL collecting authority, has responsibility for the collection of the Mayoral CIL. The Provisional Mayoral CIL liability for the application, based on the Mayoral CIL levy rate for Harrow of £60/sqm is £882,420

The floorspace subject to CIL may also change as a result of more detailed measuring and taking into account any in-use floor space and relief grants (i.e. for example, social housing).

You are advised to visit the [planningportal](https://www.planningportal.co.uk/) website where you can download the appropriate document templates.

Please complete and return the Assumption of Liability Form 1 and CIL Additional Information Form 0 .

https://ecab.planningportal.co.uk/uploads/1app/forms/form_1_assumption_of_liability.pdf

https://ecab.planningportal.co.uk/uploads/1app/forms/cil_questions.pdf

If you have a Commencement Date please also complete CIL Form 6:

https://ecab.planningportal.co.uk/uploads/1app/forms/form_6_commencement_notice.pdf

The above forms should be emailed to HarrowCIL@Harrow.gov.uk

Please note that the above forms must be completed and provided to the Council prior to the commencement of the development; failure to do this may result in surcharges and penalties

4. Harrow CIL

Harrow has a Community Infrastructure Levy which applies Borough wide for certain developments of over 100sqm gross internal floor space.

Harrow's Charges are:

Residential (Use Class C3) - £110 per sqm;

Hotels (Use Class C1), Residential Institutions except Hospitals, (Use Class C2), Student Accommodation, Hostels and HMOs (Sui generis) - £55 per sqm;

Retail (Use Class A1), Financial & Professional Services (Use Class A2), Restaurants and Cafes (Use Class A3) Drinking Establishments (Use Class A4) Hot Food Takeaways (Use Class A5) - £100 per sqm

All other uses - Nil.

The Provisional Harrow CIL liability for the application, based on the Harrow CIL levy rate for Harrow of £110/sqm is £346,665

This amount includes indexation which is 323/224. The floorspace subject to CIL may also change as a result of more detailed measuring and taking into account any in-use floor space and relief grants (i.e. for example, social housing).

The CIL Liability is payable upon the commencement of development. You are advised to visit the planningportal website where you can download the relevant CIL Forms.

Please complete and return the Assumption of Liability Form 1 and CIL Additional Information Form 0 .

https://ecab.planningportal.co.uk/uploads/1app/forms/form_1_assumption_of_liability.pdf

https://ecab.planningportal.co.uk/uploads/1app/forms/cil_questions.pdf

If you have a Commencement Date please also complete CIL Form 6:

https://ecab.planningportal.co.uk/uploads/1app/forms/form_6_commencement_notice.pdf

The above forms should be emailed to HarrowCIL@Harrow.gov.uk

Please note that the above forms must be completed and provided to the Council prior to the commencement of the development; failure to do this may result in surcharges.

5. Considerate Contractor Code of Practice

The applicant's attention is drawn to the requirements in the attached Considerate Contractor Code of Practice, in the interests of minimising

any adverse effects arising from building operations, and in particular the limitations on hours of working.

6. Party Wall Act

The Party Wall etc. Act 1996 requires a building owner to notify and obtain formal agreement from adjoining owner(s) where the building owner intends to carry out building work which involves:

1. work on an existing wall shared with another property
 2. building on the boundary with a neighbouring property
 3. excavating near a neighbouring building,
- and that work falls within the scope of the Act.

Procedures under this Act are quite separate from the need for planning permission or building regulations approval.

"The Party Wall etc. Act 1996: Explanatory booklet" is available free of charge from:

Communities and Local Government Publications, PO Box 236,
Wetherby, LS23 7NB

Please quote Product code: 02 BR 00862 when ordering

Also available for download from the CLG website:

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/133214.pdf>

Tel: 0870 1226 236 Fax: 0870 1226 237

Textphone: 0870 1207 405

E-mail: communities@twoten.com

7. Compliance with Planning Conditions

IMPORTANT: Compliance With Planning Conditions Requiring Submission and Approval of Details Before Development Commences - You will be in breach of planning permission if you start development without complying with a condition requiring you to do something before you start. For example, that a scheme or details of the development must first be approved by the Local Planning Authority. Carrying out works in breach of such a condition will not satisfy the requirement to commence the development within the time permitted. Beginning development in breach of a planning condition will invalidate your planning permission.

- If you require confirmation as to whether the works you have carried out are acceptable, then you should apply to the Local Planning Authority for a certificate of lawfulness.

8. Liability for Damage to Highway

The applicant is advised to ensure that the highway is not interfered with or obstructed at any time during the execution of any works on land adjacent to a highway. The applicant is liable for any damage caused to any footway, footpath, grass verge, vehicle crossing, carriageway or highway asset. Please report any damage to nrsua@harrow.gov.uk or telephone 020 8424 1884 where assistance with the repair of the damage is available, at the applicants' expense. Failure to report any damage could result in a charge being levied against the property.

9. Sustainable Drainage Systems

The applicant is advised that surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SUDS). SUDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible.

SUDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands. SUDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity.

Where the intention is to use soak ways they should be shown to work through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365.

Support for the SUDS approach to managing surface water run-off is set out in the National Planning Policy Framework (NPPF) and its accompanying technical guidance, as well as the London Plan. Specifically, the NPPF (2012) gives priority to the use of sustainable drainage systems in the management of residual flood risk and the technical guidance confirms that the use of such systems is a policy aim in all flood zones. Policy 5.13 of the London Plan (2016) requires development to utilise sustainable drainage systems unless there are practical reasons for not doing so. Sustainable drainage systems cover the whole range of sustainable approaches to surface drainage management. They are designed to control surface water run-off close to where it falls and mimic natural drainage as closely as possible. Therefore, almost any development should be able to include a sustainable drainage scheme based on these principles.

The applicant can contact Harrow Drainage Section for further information.

10. Designing Out Crime

For further information regarding Secure By Design, the applicant can contact the North West London Designing Out Crime Group on the following: DOCOMailbox.NW@met.police.uk

11. Network Management

The developer is urged to make early contact with Network Management in order to agree any temporary traffic management measures required; these should then be included in the detailed CLP for submission.

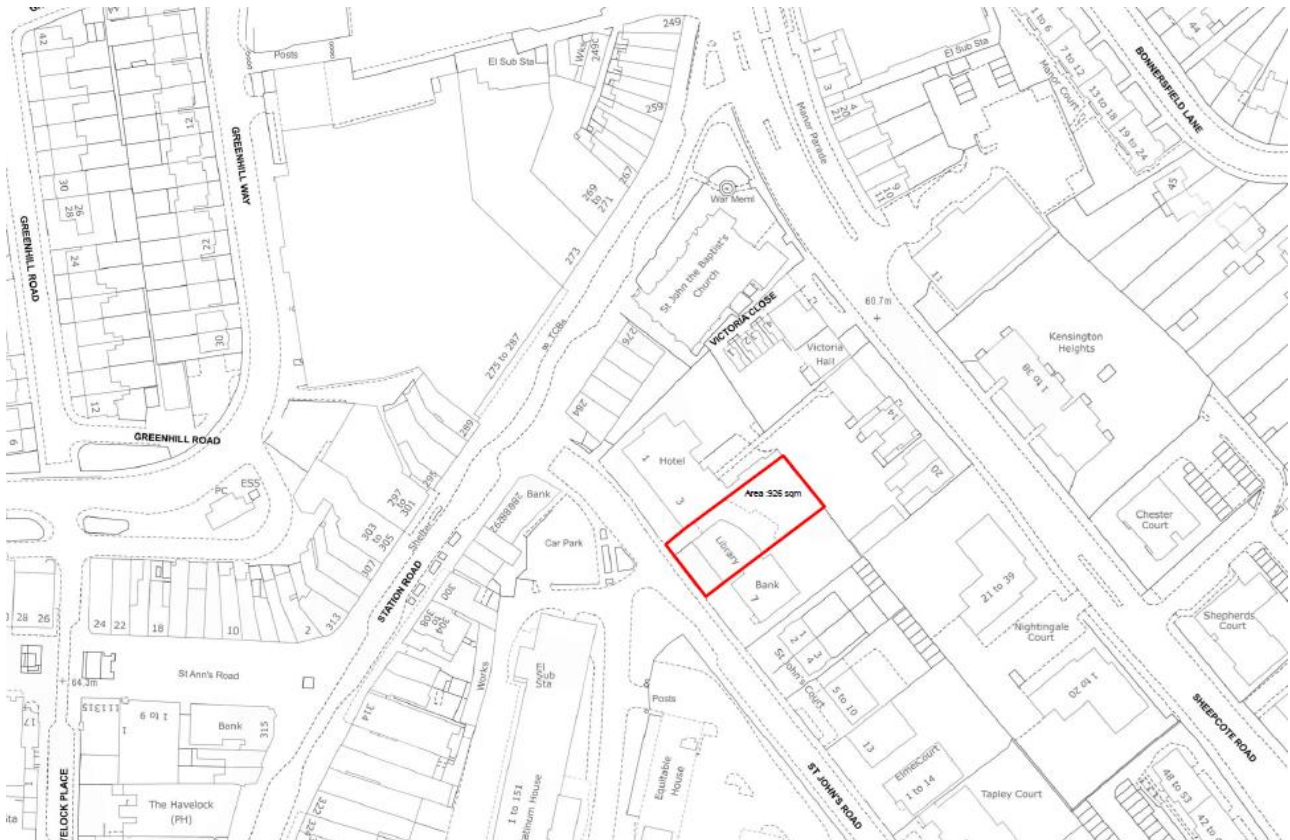
12. Landscape Management and Maintenance

A Landscape Management Plan would be expected to set out, graphically and / or in writing, the overall functional and aesthetic objectives of the landscape scheme and the steps (eg legal arrangements including ownership and management responsibilities, planned maintenance tasks, any phased works, management programme of works, monitoring procedures etc.) that will be taken after implementation to ensure that the scheme becomes successfully established and reaches maturity.

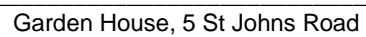
Landscape Maintenance refers to the routine physical tasks (e.g. strimming, pruning, weeding, plant replacement, watering, litter clearance, maintenance of furniture, any decorative landscape lighting etc.) required to satisfy appropriate standards of aftercare and to enable the design and implementation 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.

APPENDIX 2: SITE PLAN



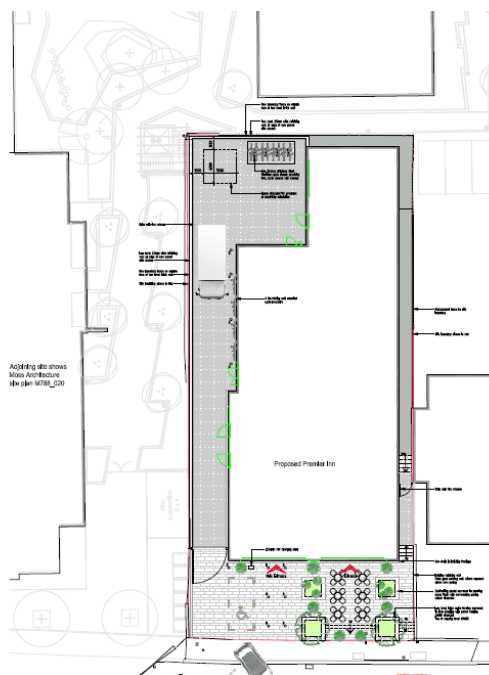
Planning Committee
Wednesday 20th July 2022



Existing site shows an Arch Structure in plan 10/100_000

Proposed Kitchen in plan 10/100_000

Proposed Bar in plan 10/100_000



APPENDIX 3: SITE PHOTOS

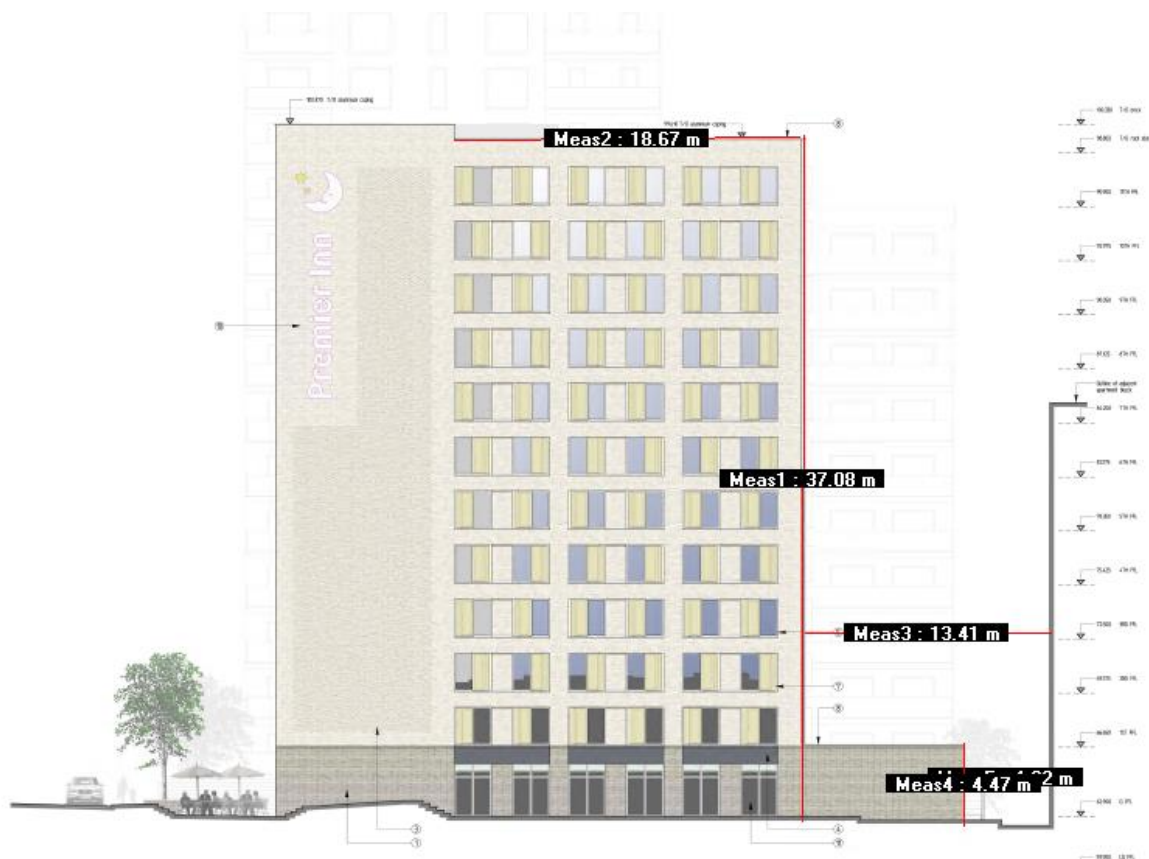


Front Elevation (Subject site to the left and Bank House to the right)

APPENDIX 4: PLANS AND ELEVATIONS



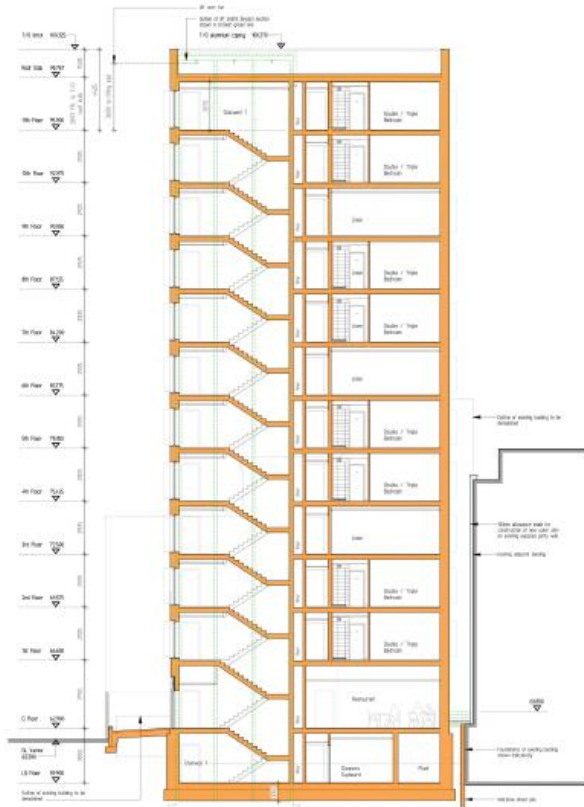




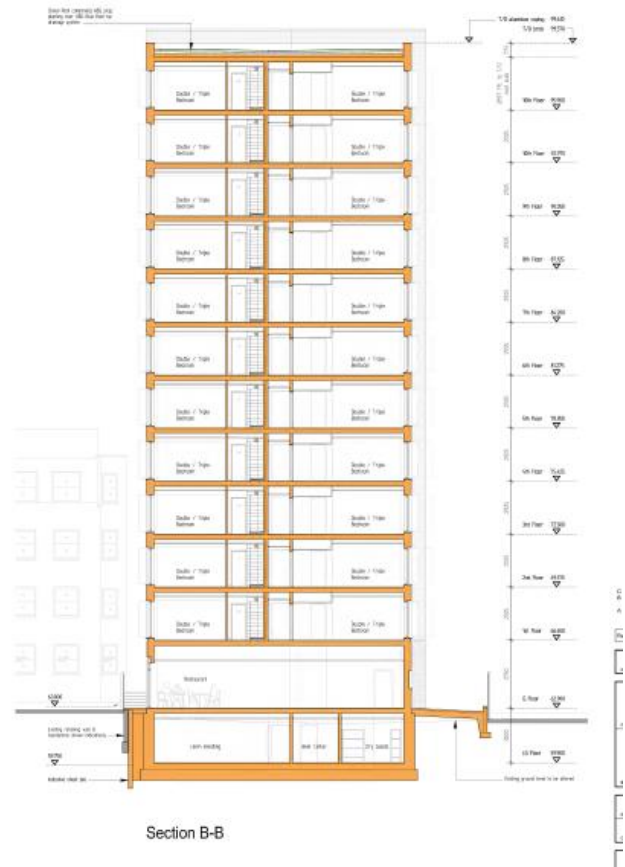
Proposed South East Facing Elevation (Side)



Proposed South West Facing Elevation (Front)

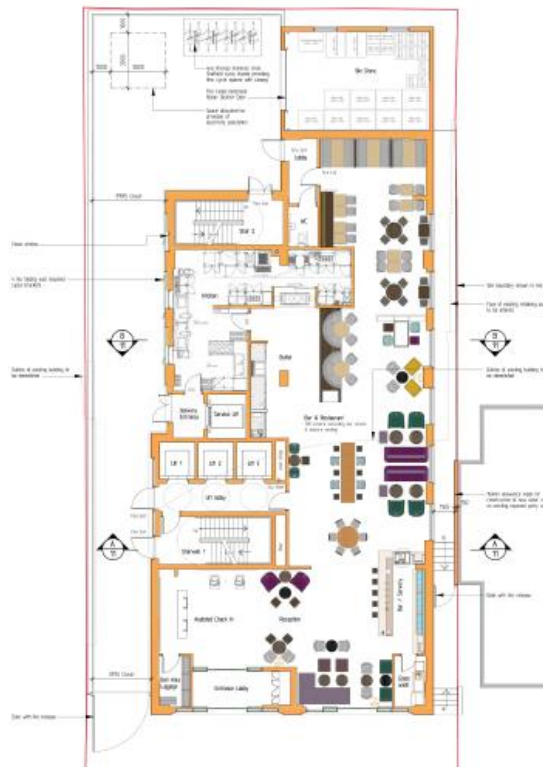


Section A-A



Section B-B

Proposed Sections



Proposed Lower Ground and Ground Floor Plan



Typical Floor Plan (Upper Floors)



Proposed Roof Plan and Uppermost level

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