



THE HARROW HILL TRUST

Caring for the heritage of the Hill and its future

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Via email to: planning.applications@harrow.gov.uk

cc Ward councillors

RE: P/3497/20 Vaughan Road Car Park

Dear Katie Parkins

The Harrow Hill Trust Planning Committee has considered this application and has the following comments.

The proposed tall building development is outside of the intensification area. The Character Assessment of Harrow's Residential Areas 2011 states in 2.10 . *“In particular, the policy also promotes a plan-led approach, generally limits tall buildings to sites within intensification areas and town centres”*. The London Plan (2011) emphasise the importance of a plan-led approach to the management of tall building proposals and hence the boundary of the intensification zone one would expect to have had some strategic rationale and this development doesn't benefit from that strategic planning.

Specifically, para 3.12 AAP *“The sub areas of Harrow Town Centre East and West are essentially areas of transition between the town centre commercial core and the surrounding residential area, with the mix of uses, densities and scale of development gradually reducing towards the sub area boundary. In effect, these two areas form the shoulders of the town centre.”* This proposed development would appear to be inconsistent with this design flow and planning strategy and with policy AAP1 B b which says for the West sub area to *“Engage directly and carefully with the streetscape at all sides”*. All sides on a boundary must include the area adjacent to that boundary. The proposal is completely out of scale with the height of neighbouring residences.

It would be clearly seen from two conservation areas. Most significantly it impacts the Roxborough Park & Grove conservation area where it is visible from four of the six identified

panoramic views. However, it would also have a significant impact on the Harrow on the Hill Village conservation area most strikingly when seen from the section of Church Fields and from Yew Walk. It would often be the only building visible above an otherwise unbroken tree line which currently provides residents with a welcome escape from the built-up surroundings and would create harm. The light pollution introduced against the night sky would extend the time duration and reach of this harm. Also, the massing is rather clumsy, elevational sculpting a bit fussy and top of the building not resolved satisfactorily. The proposed monochromatic treatment of the facades in the chosen colour creates an aggressive appearance. We consider these aspects would also add up to harm. This combined harm to two conservation areas would be contrary to policies DM6 and DM7.

This harm would not be offset by any substantial public benefit contrary to NPPF para 196. The public benefit could well be significantly less than for the existing plans as the CIL for C1 is 50% of that for residential and the New Homes Bonus and any affordable homes top up, would be lost. We wonder if this has this been quantified for Councillors?

Is there any uplift for the Council in the sale price for any planning gains? If not, and if the substantially larger buildings are granted, does this mean that Harrow Council would thereby not have achieved the best consideration, (a statutory duty S123 LGA 1972)?

It cuts the silhouette of the hill from Harrow Recreation Ground's protected view (DM3). That view sets out a viewing area across the whole of the Northern end of the park and states that "No new structures should be permitted which would breach the current skyline formed by St Mary's and Harrow on the Hill".

For these reasons we consider that the permission should be refused.

Yours sincerely

Paul Catherall

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Chair, Harrow Hill Trust Planning Committee

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