

The Pinner Association

Response to the Consultation on the Harrow Tall Buildings (Building Heights)

Supplementary Planning Document

Consultation Question: Harrow's vision for building heights is that development must be highly responsive and respectful of prevailing heights to preserve the existing character of the borough's suburban areas. Specifically, development should have regard to areas of Harrow that have a suburban or village feel to them, and not have a detrimental impact on that character. Where height is to be brought forward, this will be done in the right location and be of the right quality. Refer to the Vision for Height in the document (Page 13 of the SPD).

Response: Strongly agree. The height of new buildings should reflect and respect the height of the existing buildings in an area and minimise or eliminate any adverse effect of a tall building on a wider area. Suburban areas and the older "village" parts of the borough should be protected from the detriment to their character that buildings taller than the established building height of an area could cause.

The "prevailing height" (P in the document) for each area in the borough has been assessed in 2023 and is shown in the table on page 13 of the draft document (Note - it would be helpful if this table could be given a title and paragraph heading). **This value of P should be should not increase with time** – i.e. the P value for each area of the borough is maintained at the base line 2023 value in the table and the addition of any building with a greater number of storeys than the P value for that area (whether via planning permission or under GDPR) must not be allowed to increase the P value for that area to avoid height creep over time changing the character of an area.

Consultation Question: Harrow wants to define a 'contextually tall' building as being equal to or greater than twice that of the prevailing height of an area. In short – double the size of the buildings around it. This definition is separate to the London Plan 2021 definition of a 'tall building' – which is not less than 6 storeys or 18 metres. Refer to Defining Context in the document (or Page 17 of the SPD).

Response: Strongly Disagree. As illustrated by the schematic drawings in paragraph 2.4.3 of the draft document, a "contextually tall" building of a height 2xP (twice the prevailing height of the existing buildings in an area) would have a significant detrimental impact on the street scene and potentially the amenity of residents in a suburban area. It would be too dominant and change the character of an area. However even a building less than 2xP high, for example the part six storey "Trinity Court" development in Pinner Town Centre (P=4 area) which is clearly visible from the Pinner High Street Conservation Area and from Pinner Memorial Park, can, and does, have a severe detrimental effect of the character of the area. **Any new building proposed to be taller than the existing prevailing height (P) of the buildings in that area should be regarded as "contextually tall" and be subject to the greater planning scrutiny, design guidance and other requirements in the draft SPD document.**

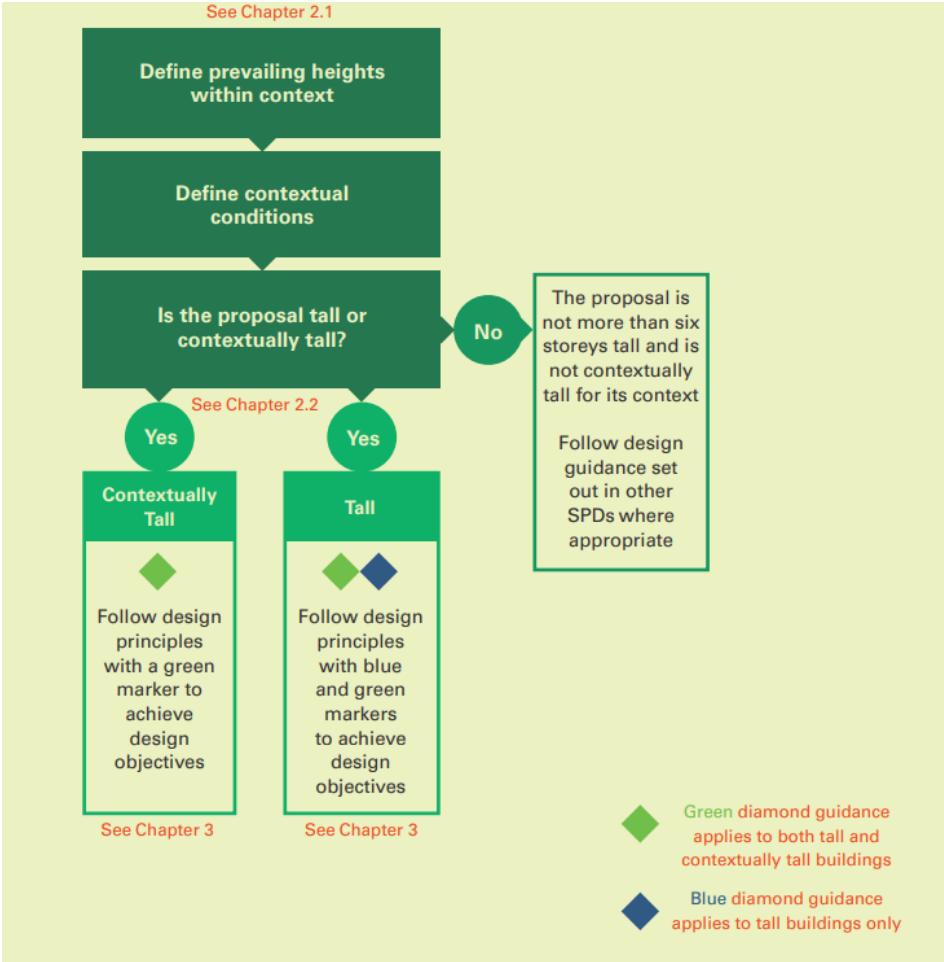
Consultation Question: Four worked examples of typical suburban contexts have been developed to help applicants determine the context within which a proposal would be located within, as these will vary across suburban Harrow. Please refer to Page 19 of the SPD. These examples include; Suburban Residential Context; Suburban Neighbourhood Parade; Suburban District / Local Centre; Suburban Mixed Character. In summary, these include reflecting local design cues, the suitability of the location, the

prevailing heights of other buildings and any unique contextual characters of the wider area. Please refer to the Worked Examples in the document.

Response: Agree that these are examples of the types of sites in a suburban setting. Are these “worked examples” meant to relate and be read with the next chapter: 3. Design Objectives and Principles? The worked examples diagrams give examples of the various types of area and context for a site, but there is no indication on whether a “contextually tall” building would be considered suitable for the site in each case.

Re “Suburban Residential Context” and “Suburban Mixed Character” areas: Any site adjacent to a residential garden rear amenity space should not be considered suitable to accommodate a “contextually tall” building adjacent to that boundary. Any site where a “contextually tall” building could give rise to actual or perceived overlooking of the private rear amenity space or into a residential property should not be considered suitable to accommodate a “contextually tall” building.

Consultation Question: The following diagram sets out the traffic light system, which applicants would need to address as part of an application.



Do you agree that this traffic light system works?

Response: Disagree. The “traffic light” flow chart diagram works as a method of defining which applications should be called as “tall” or “contextually tall” and therefore required to be subject to additional planning considerations and restrictions. However, **we consider, as stated above, that the “contextually tall” classification should apply to all applications for building with a proposed height greater than the existing prevailing height (i.e. >P).**

(Note: The “traffic lights” name for this flow chart is confusing and unnecessary - why not describe this diagram simply as a “flow chart” to avoid any confusion?)

Consultation Question: Are the Development Objectives for Developments that propose further height right for Harrow?

Objective A: Respect the character of suburban Metroland

Objective B: Protect built and landscape heritage

Objective C: Locate height appropriately

Objective D: Liveable places

Objective E: High quality external design

Objective F: Sustainable and climate friendly design

Objective G: Optimise land use

Objective H: Provide new homes

Objective I: Deliver economic growth

Response:

Objective A: Respect the character of suburban Metroland – **Strongly agree** and for this reason any building proposed to be higher than the 2023 P value for the area should be classified as “contextually tall” and be subject to the guidance in the SPD.

Objective B: Protect built and landscape heritage – **Strongly agree** and for this reason any building proposed to be higher than the 2023 P value for the area should be classified as “contextually tall” and be subject to the guidance in the SPD.

Objective C: Locate height appropriately - **Agree** and for this reason any building proposed to be higher than the 2023 P value for the area should be classified as “contextually tall” and be subject to the guidance in the SPD.

Objective D: Liveable places - **Agree**

Objective E: High quality external design - **Agree**

Objective F: Sustainable and climate friendly design – **Agree**

Objective G: Optimise land use – **Agree** but this does not mean that a “tall” or “contextually tall” building is the necessarily the correct method of optimising the use of any available site

Objective H: Provide new homes - **Agree** but this does not mean that a “tall” or “contextually tall” building is the necessarily the correct method of optimising the use of any available site. New homes should be of all types, including family sized accommodation and social housing, and not all one bedroom flats for the buy-to-let market.

Objective I: Deliver economic growth – **Neither agree or disagree** - the amenity and quality of life of existing and future residents of the borough should not be diminished for the financial gain of a commercial company. A “tall” or “contextually tall” building new building for a non-residential use should be required to deliver a real and definite improvement to the amenity of the community and infrastructure of an area, e.g. a new school or medical centre.

Consultation Question: We believe the Draft Tall Buildings (‘Building Heights’) Supplementary Planning Document (SPD) would provide clarity and certainty for the preparation of planning permissions and / or developments that seek to increase height above the surrounding prevailing heights.

Response: Strongly disagree. The draft SDP as written does not “seek to provide clarity and certainty for the preparation of planning permissions and / or developments that seek to increase height above the surrounding prevailing heights” as it would not be a consideration unless the proposed development

was a height of at least twice the prevailing height ($\geq 2P$). To **“provide clarity and certainty for the preparation of planning permissions and / or developments that seek to increase height above the surrounding prevailing heights”** the SPD must be applied to all developments greater than the existing 2023 prevailing height of an area ($>P$) and this is what should be the basis on which the SPD is applied to any proposed new development in Harrow borough.

Consultation Question: We believe the Draft Tall Buildings (‘Building Heights’) Supplementary Planning Document (SPD) will assist in ensuring that contextually tall or tall buildings will achieve exemplary design standards?

Response: Disagree. It would be nice to think that all new “contextually tall or tall buildings will achieve exemplary design standards” but that aim would in practice be difficult to achieve given the examples cited as “good design” in the draft document. The design may be more acceptable in many ways for having to comply with the SPD, but the aesthetic qualities of any building is in the eye of the beholder and modern architecture tends to be in a functional and brutalist style which will not be to everyone’s taste and be more suited to inner city locations rather than mature “Metroland” suburbs.

Consultation Question: Do you have any other comments about the Draft Tall Buildings (‘Building Heights’) Supplementary Planning Document (SPD) including any changes considered necessary to improve the document?

Responses:

- **The SPD must be applied to all developments greater than the existing 2023 prevailing height of an area ($>P$) and this is what should be the basis on which the SPD is applied to any proposed new development in Harrow borough. Any higher (taller) definition of what may constitute a “contextually tall” building would be excessive and cause real harm to the mature suburban areas in the borough.**
- Paragraph 3.5.12: “Height and massing must be located with regard to the proximity and outlook of neighbouring buildings, minimising harm through loss of light, outlook and overbearing.” – this paragraph of “Design Principle C4 Orientation and neighbouring sites” implies that Harrow Council considers it acceptable to inflict harm to some extent on the existing residents of the borough so long as this not to the maximum that the proposed development may have caused harm without design modifications. **New developments should in all cases be designed so as to eliminate any harm from “loss of light, outlook and overbearing”.**
- This draft SPD has been written with a presumption that a “tall” or “contextually tall” building may be a suitable form of development in a mature “Metroland” suburb, a presumption which The Pinner Association would challenge. **In our opinion a “tall” or “contextually tall” building should only be considered to be an acceptable form of development in a suburb in exceptional circumstances and all other forms of development should have been considered prior to an over prevailing height building being proposed for a site.**

The Pinner Association. 13th April 2023.

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