



# Tall Buildings (Building Heights)

Supplementary Planning Document

London Borough of Harrow  
July 2023



LONDON BOROUGH OF  
**HARROW**

## **London Borough of Harrow Tall Buildings (Building Heights) Supplementary Planning Document**

This document provides guidance on the design, suitability and sensitivity of contextually high buildings and tall buildings within suburban areas of the London Borough of Harrow.

Researched and written by London Borough of Harrow Planning Policy and Urban Design.

This SPD draws upon the Harrow Characterisation and Tall Buildings Study prepared by Allies and Morrison Urban Practitioners.

Graphic Design by London Borough of Harrow.

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# Foreword

As Deputy Leader of the Council, and Portfolio Holder for Planning & Regeneration, it gives me great pleasure to welcome this Supplementary Planning Document and I am confident that it will make a positive addition to our suite of planning documents and ensure high quality development across Harrow suburbs. This supplementary planning document will allow the Council to better resist inappropriate development and ensure a high-quality environment that residents can be proud of.

The London Borough of Harrow is an outer London Borough, as has a very strong suburban character. The growth of Harrow came through the expansion of the London underground network, which gave rise to the term 'Metroland'. It is this strong and distinctive character that the Council wish to protect.

It is important to emphasise that this document does not create new policy in relation to tall buildings as defined in Policy D9 (Tall buildings) of the London Plan (2021). This supplementary planning document seeks to provide local design guidance for proposals within the suburbs of Harrow and excluding the Opportunity Area as set out in the Harrow and Wealdstone Area Action Plan adopted in July 2013.

**Cllr Marilyn Ashton**  
Deputy Leader;  
Planning & Regeneration Portfolio Holder



Aerial view of Kenton, London Borough of Harrow

1.0

# Introduction

- 1.1.1 The Council recognises Harrow's place as an outer London borough, and is seeking to achieve sensitive densification of its suburban areas. This will result in more development on previously developed or underdeveloped land, or redevelopment of existing sites with additional density appropriate for the suburban context.
- 1.1.2 To achieve this aim in a sensitive manner, 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.
- 1.1.3 Many of the benefits associated with tall buildings apply to higher density schemes of all types rather than tall buildings per se. Compact living can reduce energy consumption per household, give good access to shops and services and support these uses; and encourage active and public transport, reducing reliance on private motor vehicles. Buildings with additional height may also assist in delivering community facilities and amenities that residents need, so Harrow becomes the place they want to spend their time and money, creating a thriving local economy and supporting local Harrow businesses.
- 1.1.4 However, these benefits can only be realised if the social infrastructure, commercial uses and public transport are in place to support a shift in behaviour. High density living without these surrounding characteristics can result in overcrowded, isolated and car dominated areas.
- 1.1.5 The Council see the Tall Buildings (Building Heights) Supplementary Planning Document (SPD) as an essential way to maintain the spatial character and value of Harrow as an Outer London borough and the following guidance in this document is clustered around the three themes of addressing place, quality architecture and delivering good growth.
- 1.1.6 The focus for Harrow will be to provide a range of homes across the borough, with typologies that suit their context (both in terms of townscape and quality of life) and can integrate well with surroundings. Fundamentally, to meet housing need the focus will be on appropriate density rather than tall buildings. Tall buildings should be considered exceptional, both in their frequency and in their design.

1.2.1 This SPD provides guidance on the assessment and design of buildings which are relatively high in the context of their local setting. These are referred to as **'contextually high buildings'** and are those that are equal to or greater than twice the prevailing height within a suburban area; and **'tall buildings'**, which are those that are not less than 6 storeys or 18 metres as measured from ground to the floor level of the uppermost storey.

1.2.2 Guidance within this SPD should be used by applicants who are proposing developments which are higher than the prevailing height of a suburban area to better understand the impact of such development and achieve a high quality of design.

1.2.3 Contextually high development may occur through a total site redevelopment or through upward extensions and the use of Permitted Development Rights (PDR).

## Chapter 1: Introduction

Use this Chapter to understand why the Council has decided to develop the document, how to use it and where it applies to, the document's status and the wider policy and design guidance background around taller buildings.

### Key topics covered:

- The Council's vision
- SPD status and application
- Local, regional and national planning policy

## Chapter 2: Understanding Height and Harrow's Suburban Character

Use this Chapter to understand the definition of contextually high, and to determine if a proposed development falls into this category. Understand the steps for taking a context-led analysis approach to site development and massing.

### Key topics covered:

- Prevailing height
- Context analysis
- Contextually high definition

## Chapter 3: Design Objectives and Principles

Use this Chapter to understand design guidance for proposals which fall within the contextually high definition. Guidance is broken into 9 Objectives, with a number of Design Principles covering each objective.

### Key topics covered:

- Place, Architecture & Good Growth themes
- Design Objectives
- Design Principles

## Chapter 4: Application process and requirements

This Chapter covers the various assessments and requirements needed for contextually high development. It also outlines the planning process and tools within this to assist in delivering high quality development.

### Key topics covered:

- The application process
- Supporting assessments
- The planning process

Figure 1A

# Where to use this document

# 1.3

1.3.1 This SPD is to be used for proposals that relate to contextually high buildings (in a Harrow context) and for Tall buildings (as defined by London Plan (2021) in the suburban areas of Harrow.

1.3.2 Suburban areas cover the majority of the borough, including residential areas and local and district centres.

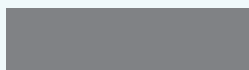
1.3.3 Suburban areas are defined as those parts of the borough outside of the Harrow and Wealdstone Opportunity Area.

1.3.4 As a result, this SPD applies to all parts of the borough (shown in orange in the below map) other than the Harrow and Wealdstone Opportunity Area. Alternative design guidance is provided for the Opportunity Area.

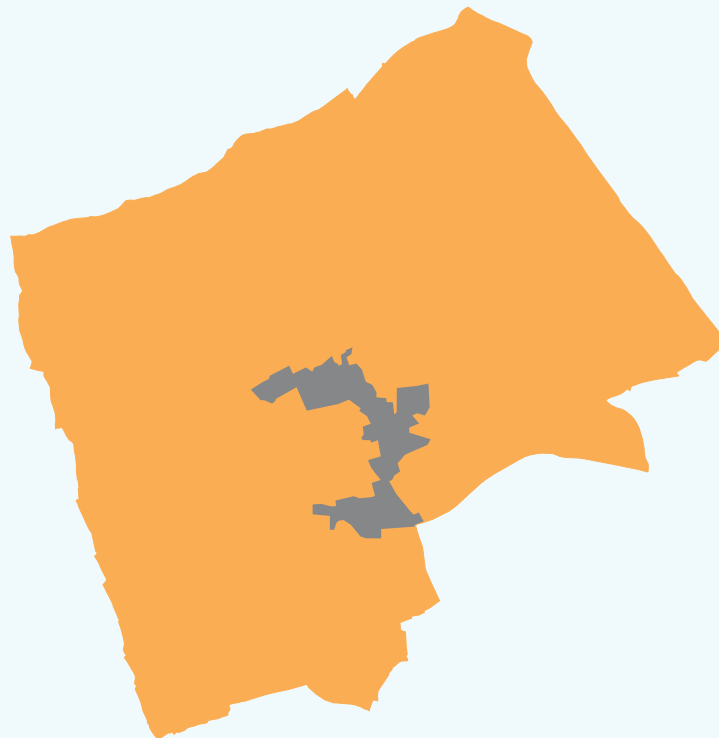
## London Borough of Harrow



Area where Tall Buildings (Building Heights) SPD applies



Area where Tall Buildings (Building Heights) SPD does not apply



The 'Harrow Planning Maps' website, which shows the Opportunity Area boundary, can be accessed via this [link](#).

Figure 1B

# Status of this document

# 1.4

1.4.1 The Tall Buildings (Building Heights) SPD forms a material consideration in determining applications for contextually high and tall buildings within suburban Harrow. This means that in addition to satisfying the requirements of national, regional and local planning policies (as expressed in the borough's development plan - comprising the London Plan and Harrow

Local Plan), development proposals relating to the development of contextually high and tall buildings will also need to demonstrate how the guidance in this SPD has been considered. The Council intends to integrate this guidance into a future Local Plan, giving it even greater weight as part of the borough's development plan.

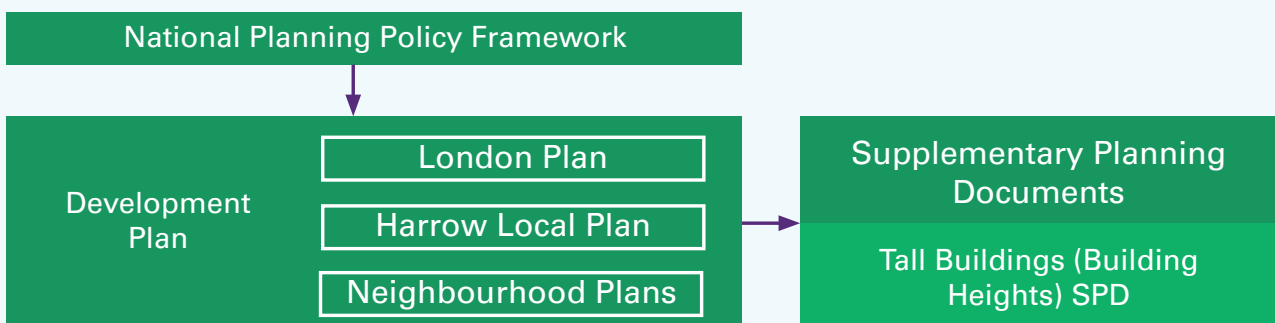


Figure 1C



## Why has this Supplementary Planning Document been prepared?

- 1.5.1 This Supplementary Planning Document (SPD) sets out detailed guidance for planning applications proposing buildings which are contextually high within suburban locations within the London Borough of Harrow. In doing so, it provides further guidance to policies within the Harrow Local Plan.
- 1.5.2 The SPD provides guidance to determine what would constitute a contextually high building within suburban Harrow and design guidance to ensure any development would be of a high quality. It does not provide a definition of a tall building, which is set out within Policy D9 (Tall buildings) of the London Plan (2021).
- 1.5.3 This SPD only applies to areas outside of the Harrow & Wealdstone Opportunity Area. The Tall Buildings (Building Heights) SPD builds on the Harrow Characterisation and Tall Building Study, which was completed in August 2021 by Allies & Morrison Urban Practitioners.
- 1.5.4 This study is a twofold evidence base, by firstly providing a contemporary character study of the entire borough. This assists by setting a baseline of character across the borough, from which a contextual analysis is able to be undertaken whereby allowing an understanding of what height a contextually high buildings could result in. Specifically for the purposes of this SPD, the study provides a clear evidence base demonstrating the predominantly suburban character of Harrow. This SPD provides guidance in relation to building heights within that suburban context.
- 1.5.5 This SPD was prepared following early stakeholder engagement in drafting the document, followed by formal consultation that was in accordance with the Harrow Council Statement of Community Involvement. This included a seven week consultation period utilising agreed (by Harrow Cabinet) methods of consultation.

1.6.1 The production of the Tall Buildings (Building Heights) SPD has been progressed in accordance with relevant legislation, guidance and policy, to ensure that it reflects national,

London-wide and borough policies as well as best practice guidance from other national bodies active in the built environment.

## The planning policy hierarchy

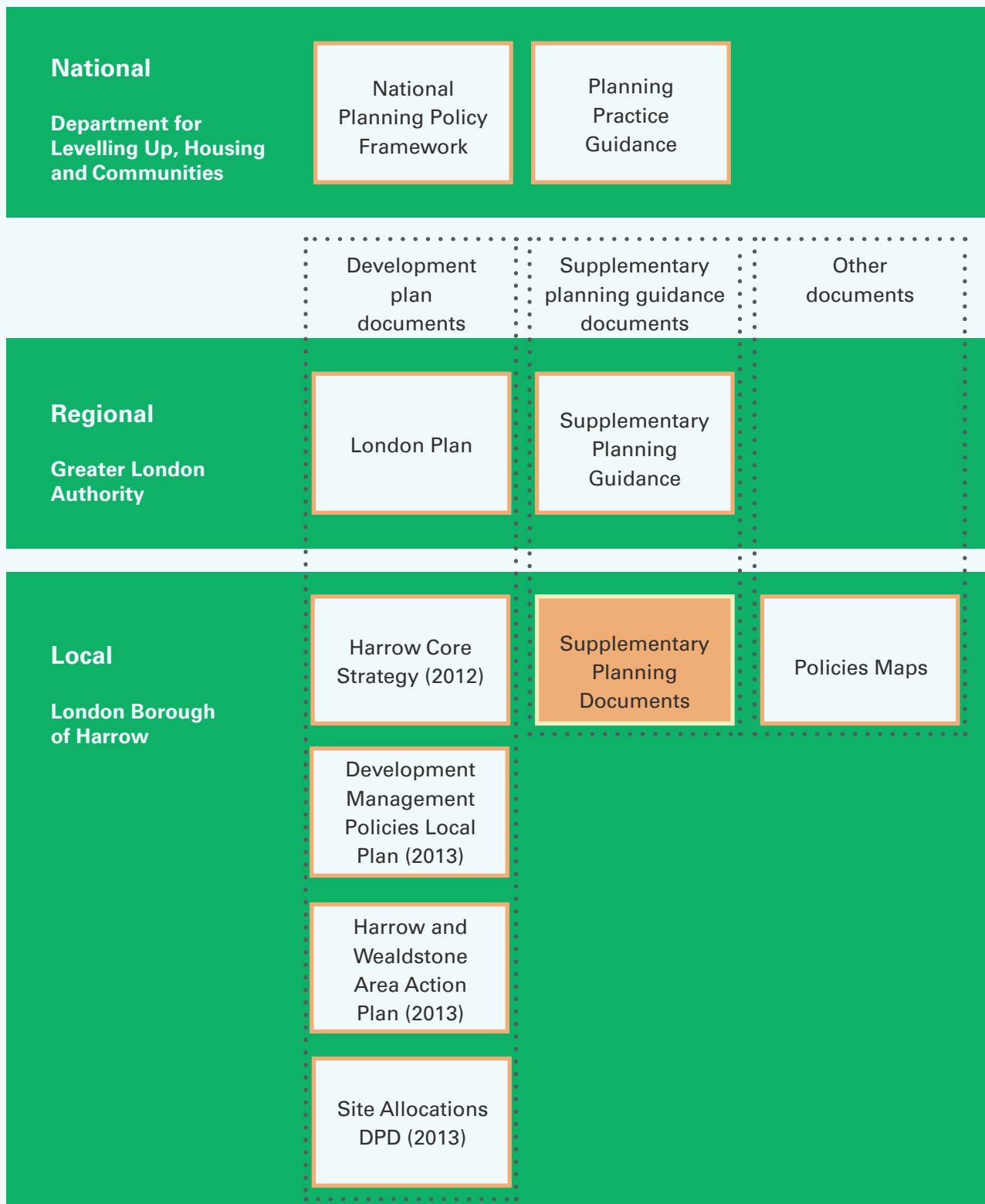


Figure 1D

## National Planning Policy Framework (2021)

- 1.6.2 The National Planning Policy Framework (NPPF) does not provide specific national guidance on the development of taller buildings. However, paragraphs 119 and 124 of the NPPF state that “planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions”
- 1.6.3 Chapter 12 of the NPPF set out requirements in relation to achieving well-designed places, where paragraph 126 states “Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this”
- 1.6.4 A central theme of the NPPF 2021 is that good design is a key aspect of sustainable development, creating better places in which to live and work and make development

acceptable to communities. In this context, Paragraph 124 of the NPPF states:

“Planning policies and decisions should support development that makes efficient use of land, taking into account:

- A. the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- B. local market conditions and viability;
- C. the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- D. the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- E. the importance of securing well-designed, attractive and healthy places.”

## London Plan (2021)

- 1.6.5 The London Plan is the spatial development plan for Greater London, and forms part of the development plan for the London Borough of Harrow. The most recent London Plan was published in March 2021. This introduced Policy D9 (Tall buildings) which provides a prescriptive policy on the approach to tall buildings across London.
- 1.6.6 All planning applications must be assessed against the development plan, which in London includes the London Plan (2021). Therefore applications must demonstrate compliance with the London Plan, along with Local Plan documents also.
- 1.6.7 Policy D9 of the London Plan (2021) sets out that tall buildings are based on local context, and that the definition of a tall building would vary from place to place. To be considered a tall

building in relation to Policy D9 of the London plan (2021), a building should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey (or where a local plan definition is set out and in accordance with Policy D9 of the London Plan (2021) requirements). This purely relates to a definition of a tall building, not the suitability of a tall building in a particular location.

- 1.6.8 New development that is taller than its surrounding context, but does not meet the definition of a tall building as set out in Policy D9 (Tall buildings) of the London Plan (2021), will not automatically be considered as acceptable. The acceptability of a building taller than its surroundings, will be subject to consideration against guidance in this SPD, and also relevant policies within the development plan as a whole.

## Harrow Local Plan

1.6.9 Within Harrow, the development plan is made up of the London Plan and the:

- A. Harrow Core Strategy (2012)
- B. Harrow Development Management Policies Local Plan (HDMPLP) (2013)
- C. Harrow & Wealdstone Area Action Plan (2013)
- D. Site allocations DPD (2013)
- E. Policies Maps

1.6.10 The Harrow & Wealdstone Area Action Plan (2013) provides detailed implementation policies, including tall buildings / building heights / site allocations. Development within the Harrow & Wealdstone Opportunity Area must respond to policies within the Harrow & Wealdstone Area Action Plan (2013).

1.6.11 This SPD does not apply within the Harrow & Wealdstone Opportunity Area. Opportunity Areas are designated through the London Plan, and are noted as areas where growth is directed to and are subject to significant change. It is recognised that the Harrow & Wealdstone Opportunity Area represents where growth has been strategically directed to over the local plan period, and as such has already undergone significant change including many tall building developments. This SPD only applies to the suburban context of Harrow, which is outside of the designated Harrow & Wealdstone Opportunity Area, where the development plan does not envision such significant change and development opportunities.

1.6.12 Currently, the Harrow Development Management Policies Local Plan (2013) does not contain a specific policy in relation to tall buildings. By reason of this, there are no

areas outside the Opportunity Area within the borough that are identified as being appropriate or inappropriate for tall building development.

1.6.13 Policy DM1 (Achieving a High Standard of Development) provides policy seeking to ensure that all developments must achieve a high standard of design and layout. Specifically in relation to height, Policy DM1 sets out that in assessing design and layout, applications must have a regard to massing, bulk and height in relation to the location in which it is situated. It goes on to provide direction to assess the context provided by neighbouring buildings and the local character and pattern of development. Full text of Policy DM1 (Achieving a High Standard of Development) is set out below as Figure 1E.

1.6.14 This SPD provides additional detail and design guidance in relation to DM1, specifically to assist applications address the assessment requirements for buildings that are proposed as higher than their suburban surroundings. Tall buildings (as per the London Plan (2021) or contextually higher building applications will need to consider all other relevant policies within the Development Plan.

1.6.15 This SPD provides guidance in relation to determining what would be defined as a contextually high building in suburban locations, along with guidance to ensure a high quality development is delivered. There may also be other relevant SPDs subsequently adopted by the Council and the Council's website should be reviewed to identify these.

1.6.16 Guidance provided within this SPD will inform a tall buildings policy within the new local plan.

## **Policy DM1: Achieving a High Standard of Development**

### **Design and Layout Considerations**

A. All development and change of use proposals must achieve a high standard of design and layout. Proposals which fail to achieve a high standard of design and layout, or which are detrimental to local character and appearance, will be resisted.

B. The assessment of the design and layout of proposals will have regard to:

a. the massing, bulk, scale and height of proposed buildings in relation to the location, the surroundings and any impact on neighbouring occupiers;

b. the appearance of proposed buildings, including but not limited to architectural inspiration, detailing, roof form, materials and colour, entrances, windows and the discreet accommodation of external services;

c. the context provided by neighbouring buildings and the local character and pattern of development;

d. the provision of appropriate space around buildings for setting and landscaping, as a resource for occupiers and to secure privacy and amenity;

e. the need to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit;

f. the functionality of the development including but not limited to the convenience and safety of internal circulation, parking and servicing (without dominating the appearance of the development) and the appearance, capacity, convenience, logistics and potential nuisance of arrangements for waste, recycling and composting; and

g. the arrangements for safe, sustainable and inclusive access and movement to and within the site.

*Figure 1E*

## **Harrow Garden Land Supplementary Planning Document (2013)**

1.6.17 Applicants should have regard to the Garden Land SPD to ensure that there is no conflict with garden land development.

## **Historic England - Tall Buildings Advice Note**

1.6.18 Historic England's guidance on tall buildings is set out in 'Advice Note 4'. This document reflects the importance of preserving the historic environment when planning for tall buildings. Historic England recommend that local planning authorities adopt a plan led approach to managing tall buildings.

1.6.19 Part 2 notes that the importance of a plan-led approach (paragraph 15 of the NPPF (2021)) which can be used to direct the location and development parameters of tall building development and help deliver sustainable development.

2.0

Understanding  
height and  
Harrow's suburban  
character

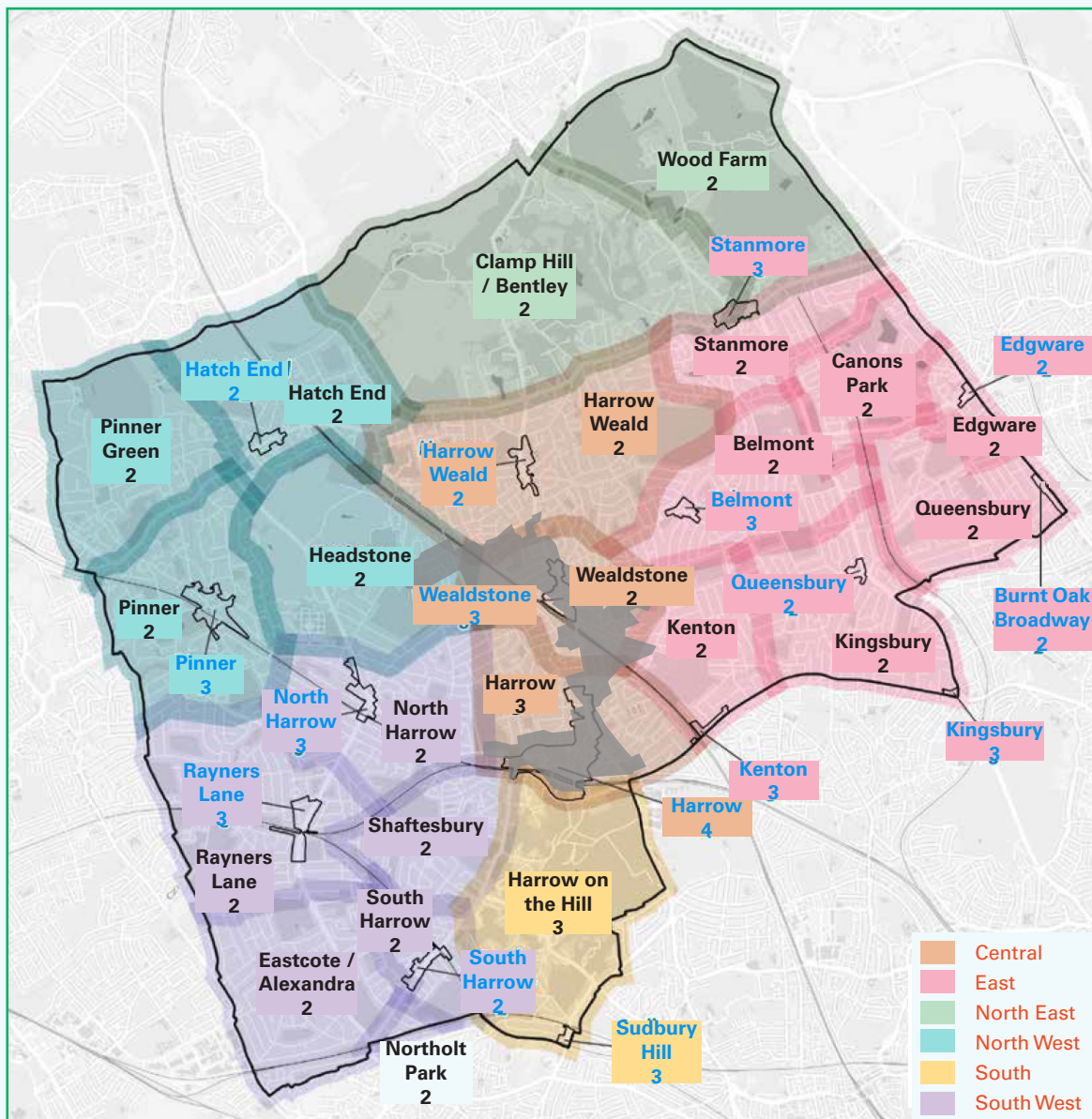
## Establishing existing prevailing heights in Harrow

2.1.1 This section provides guidance in determining what would constitute a contextually high building within suburban locations. To determine what would be a contextually high building, applications will need to consider a number of elements.

2.1.2 In term of the built character of suburban Harrow, and as displayed below in Figure 2A, the majority of building stock is largely between 2 to 3 storeys.

2.1.3 Almost two-thirds of Harrow’s housing stock dates from the inter-war period. Significant neighbourhoods of semi-detached and short terraces appeared rapidly as fields became homes, gardens, streets, parades and recreation grounds. This suburban housing typology continues to be one of the principal characteristics of Harrow’s suburbs, particularly to the south east and south west of the borough. Figure 2 demonstrates how much of the borough is suburban, or nonetheless has height of 2 to 3 storeys.

Figure 2A



The plan above illustrates the prevailing height for each neighbourhood (black text) and town centre (blue text). Prevailing heights are generally between 2- 3 storeys across the borough, with the exception of Harrow town centre which sit at 4 storeys. This is reflected in the summary table on the following pages.

Figure 2B

	Neighbourhood or Town Centre	Prevailing Height (storeys)	Contextually High Building (storeys)	Tall Building London Plan Policy D9 (storeys / metres)
North West	Pinner	2	≥ 4	6 / 18m
	Pinner Town Centre	3	≥ 6	6 / 18m
	Pinner Green	2	≥ 4	6 / 18m
	Hatch End	2	≥ 4	6 / 18m
	Hatch End Town Centre	2	≥ 4	6 / 18m
	Headstone	2	≥ 4	6 / 18m
South West	North Harrow	2	≥ 4	6 / 18m
	North Harrow Town Centre	3	≥ 6	6 / 18m
	Rayners Lane	2	≥ 4	6 / 18m
	Rayners Lane Town Centre	3	≥ 6	6 / 18m
	Eastcote/ Alexandra	2	≥ 4	6 / 18m
	Shaftesbury	2	≥ 4	6 / 18m
North East	South Harrow	2	≥ 4	6 / 18m
	South Harrow Town Centre	2	≥ 4	6 / 18m
	Northolt Park	2	≥ 4	6 / 18m
	Clamp Hill/ Bentley	2	≥ 4	6 / 18m
	Wood Farm	2	≥ 4	6 / 18m
	Harrow Weald	2	≥ 4	6 / 18m
Central	Harrow Weald Town Centre	2	≥ 4	6 / 18m
	Wealdstone	2	≥ 4	6 / 18m
	Wealdstone Town Centre*	3	≥ 6	6 / 18m
	Harrow	3	≥ 6	6 / 18m
South	Harrow Town Centre*	4	≥ 8	6 / 18m
	Harrow on the Hill	3	≥ 6	6 / 18m
	Sudbury Hill	3	≥ 6	6 / 18m
	Stanmore	2	≥ 4	6 / 18m
East	Stanmore Town Centre	3	≥ 6	6 / 18m
	Belmont	2	≥ 4	6 / 18m
	Belmont Town Centre	3	≥ 6	6 / 18m
	Canons Park	2	≥ 4	6 / 18m
	Edgware	2	≥ 4	6 / 18m
	Edgware Town Centre	2	≥ 4	6 / 18m
	Queensbury	2	≥ 4	6 / 18m
	Queensbury Town Centre	2	≥ 4	6 / 18m
	Burnt Oak Broadway	2	≥ 4	6 / 18m
	Kingsbury	2	≥ 4	6 / 18m
Kingsbury Town Centre	3	≥ 6	6 / 18m	
	Kenton	2	≥ 4	6 / 18m
	Kenton Town Centre	3	≥ 6	6 / 18m

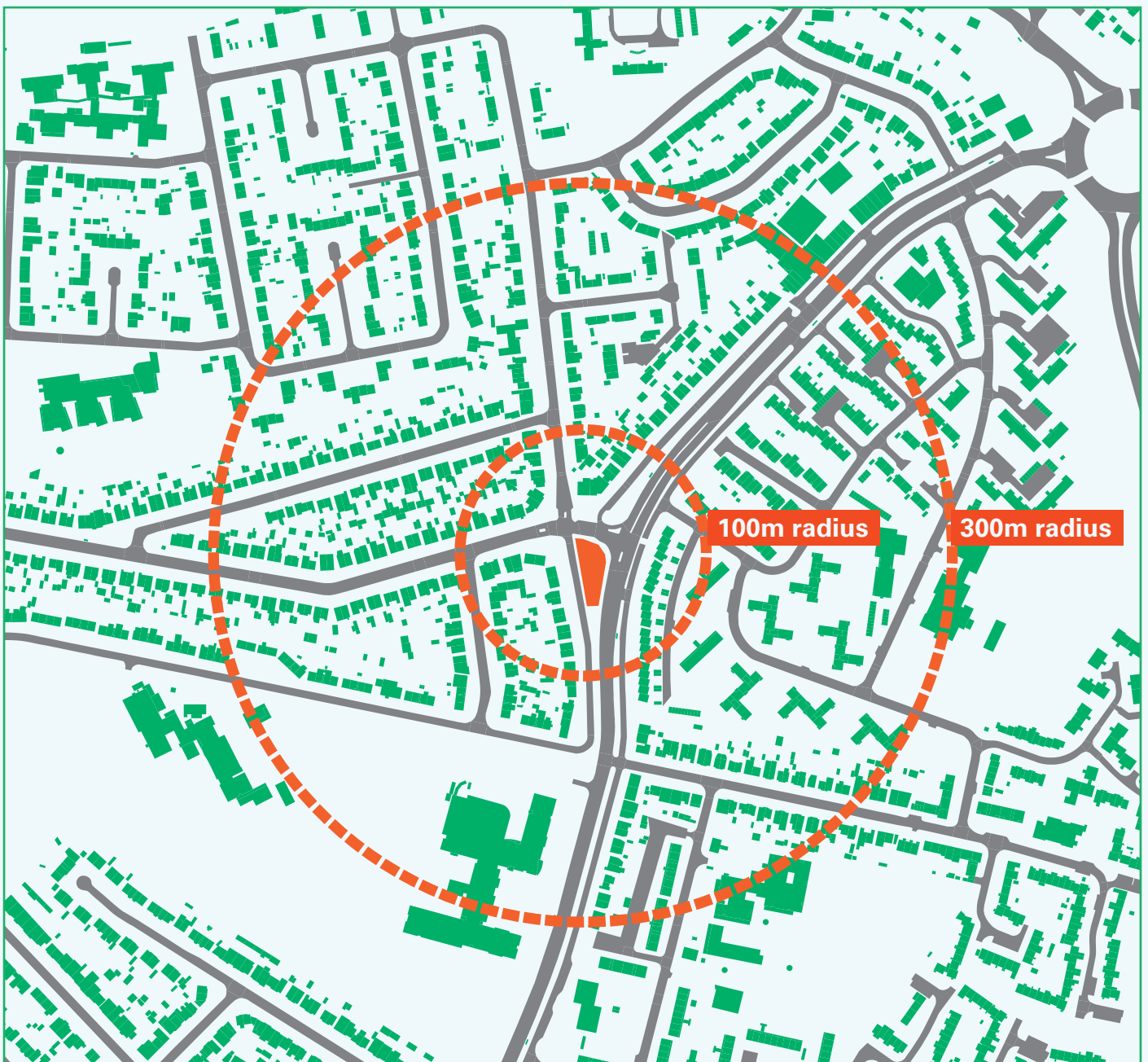
Summary table of prevailing heights in Harrow's suburban areas and 'contextually high' and 'tall' (London Plan 2021) definitions for those areas. The London Plan defines 'tall' as not less than 6 storeys or 18 metres as measured from ground to the floor level of the uppermost storey.



## Determining prevailing height for a site's context

- 2.1.4 Determining prevailing height for site contexts is a critical step in assessing what building heights will be appropriate for that area.
- 2.1.5 Short range and long range views of taller buildings can allow for a more detailed assessment of a proposal's visibility and impact on the character of an area.
- 2.1.6 Prevailing heights from a radius of 100m and 300m of a development site should be identified. There can be variation at a localised level, but generally building heights become more homogeneous over larger areas.
- 2.1.7 A requirement to determine prevailing building height does not negate the need for a Townscape and Visual Impact Assessment (TVIA), where needed or for other massing impact testing.
- 2.1.8 Figure 2C shows how an assessment of prevailing height can be undertaken, which will provide a more detailed and granular assessment than the table on the previous page, which serves as a general overview on prevailing heights in the borough.

Figure 2C



Prevailing heights from a radius of 100m and 300m from the site should be taken as well as other townscape assessments as necessary.

## Establishing context

2.2.1 The map of prevailing heights provides a general understanding of existing height across the borough. However, an assessment of context cannot be achieved by looking at this map alone, as prevailing height will change at a more local and granular level.

2.2.2 As such, any application must provide a detailed analysis of the context in which it is proposed. This should lead to an assessment of what further height may be considered acceptable.

2.2.3 Applicants will need to provide a detailed assessment of the wider suburban context in order to determine if a proposed development is 'contextually high' for that area.

2.2.4 Following an assessment of prevailing height, applicants should also assess the following contextual factors:

- **Outlier heights**
- **Plot size**
- **Distance between buildings**
- **Built grain / pattern of development**
- **Building lines and setbacks**
- **Road layout**
- **Building use classes**
- **Building typologies and architectural styles**
- **Nearby heritage assets**
- **Flood risk**
- **Site Levels of site / neighbouring sites**
- **Connectivity and public transport**
- **Local amenities and services**

Figure 2D



Suburban road layouts and the typologies which surround them should be assessed in detail, along with other contextual factors listed above.

## Flow chart for assessing context

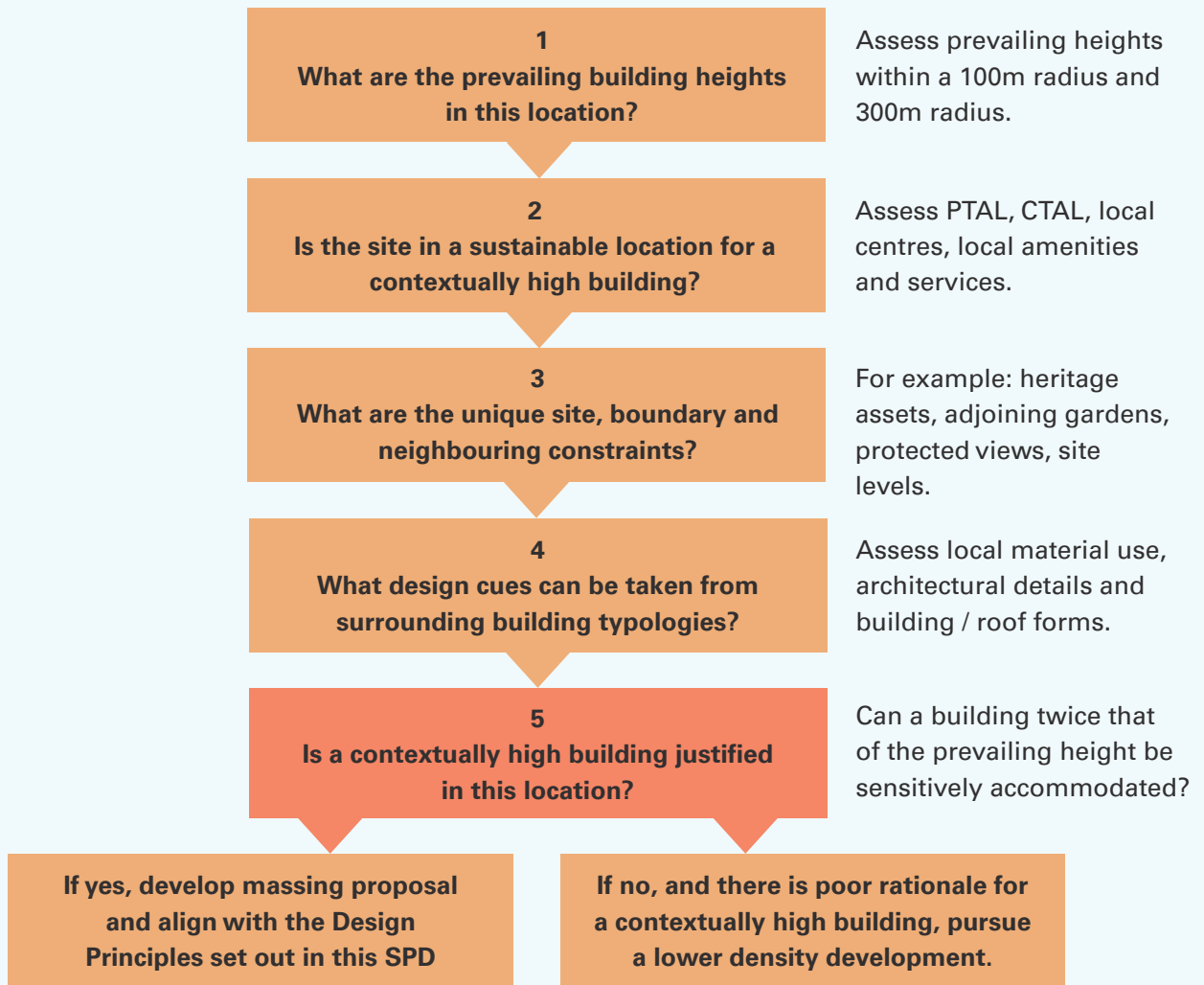


Figure 2E

2.3.1 The following are a selection of worked examples of varying suburban contexts to assist applicants in understanding the expectations of the Local Planning Authority in relation to determining the context of a locality. Doing so provides a baseline for how proposed additional height is likely to be considered

and what would constitute a contextually high building.

- Example 1: Suburban Residential Context**
- Example 2: Suburban Neighbourhood Parade**
- Example 3: Suburban District Centre Context**
- Example 4: Suburban Mixed Character**

## Example 1: Suburban Residential Context

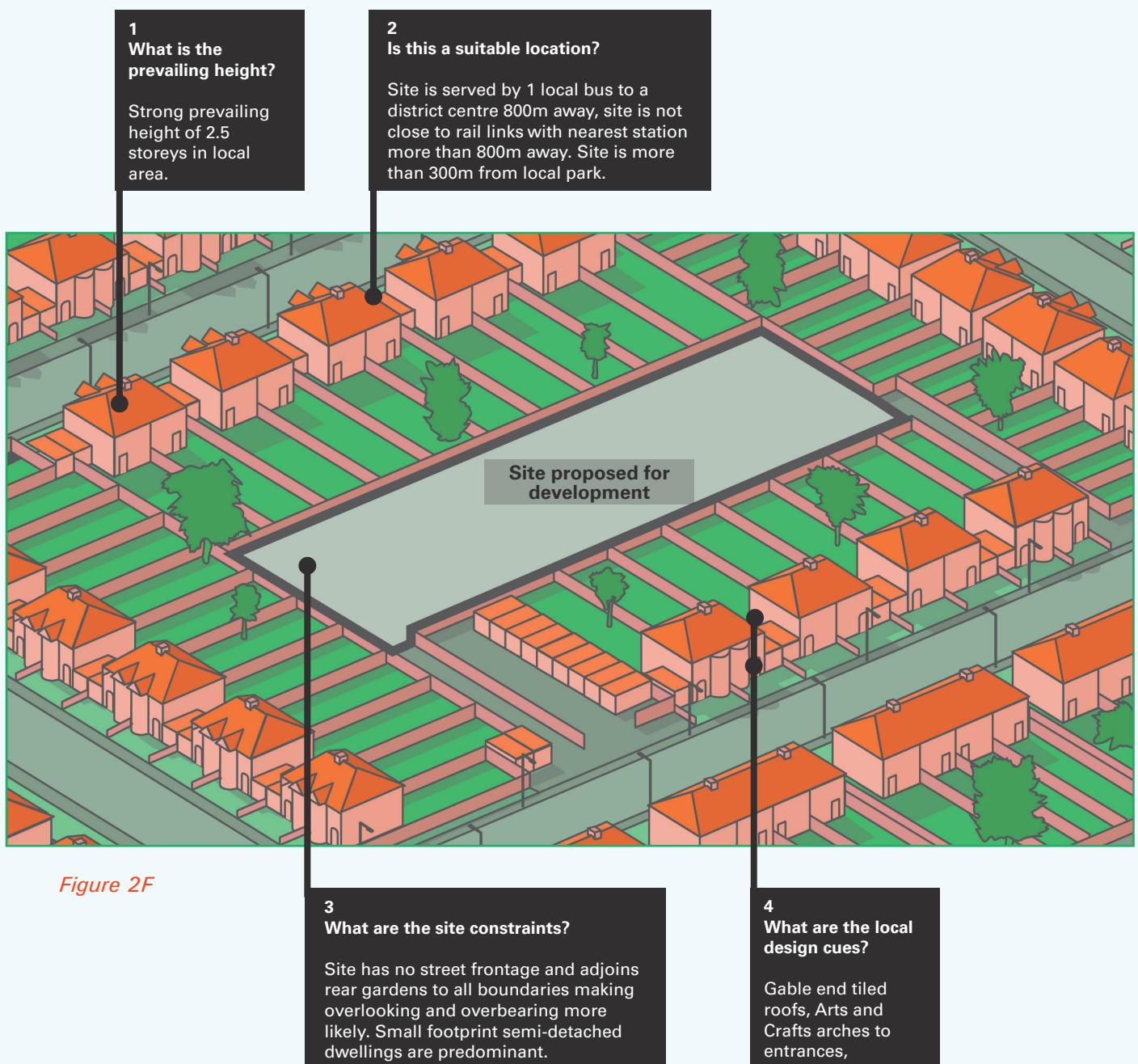


Figure 2F

## Example 2: Suburban Neighbourhood Parade

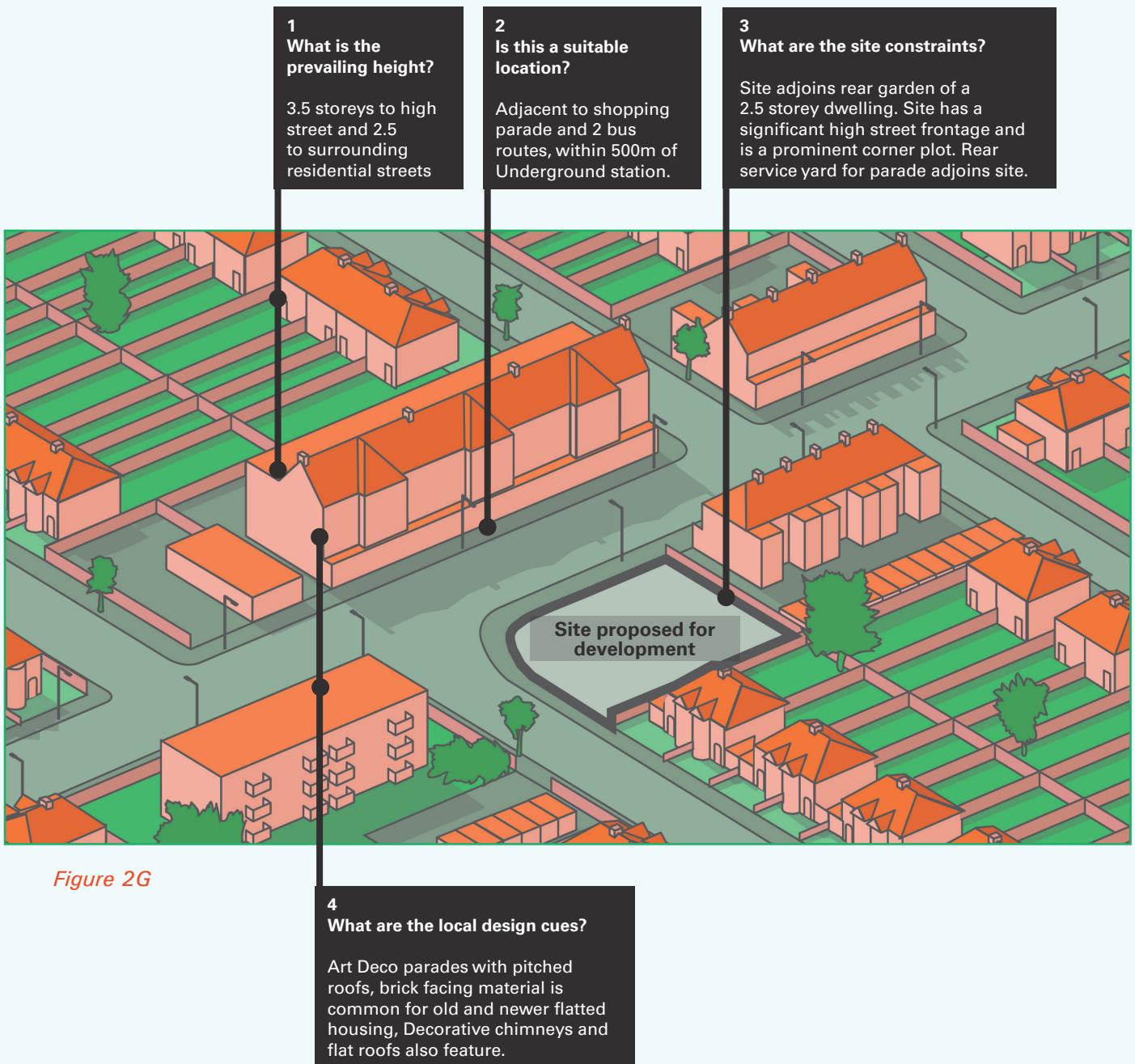


Figure 2G

### Example 3: Suburban District / Local Centre

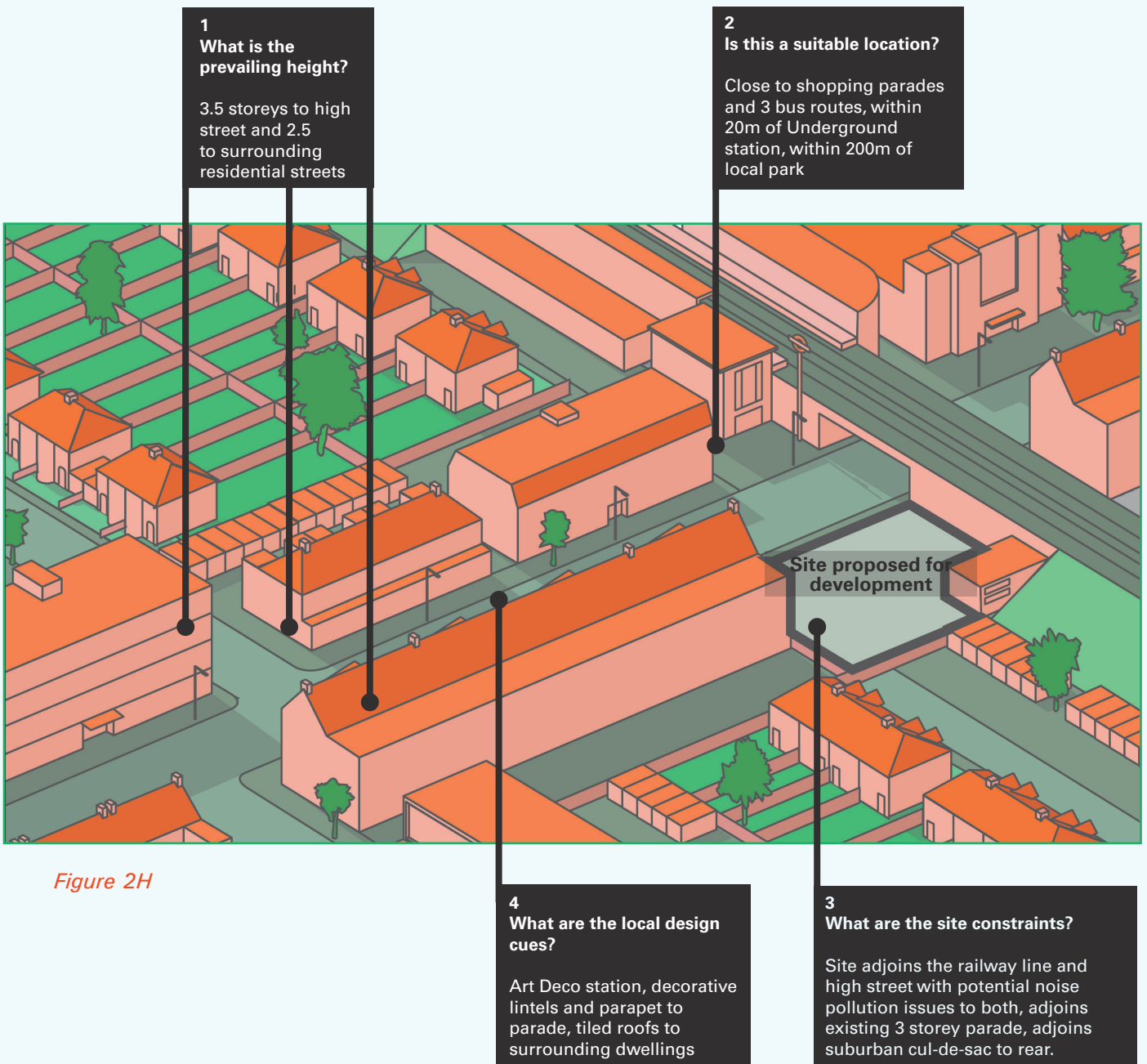


Figure 2H

## Example 4: Suburban Mixed Character

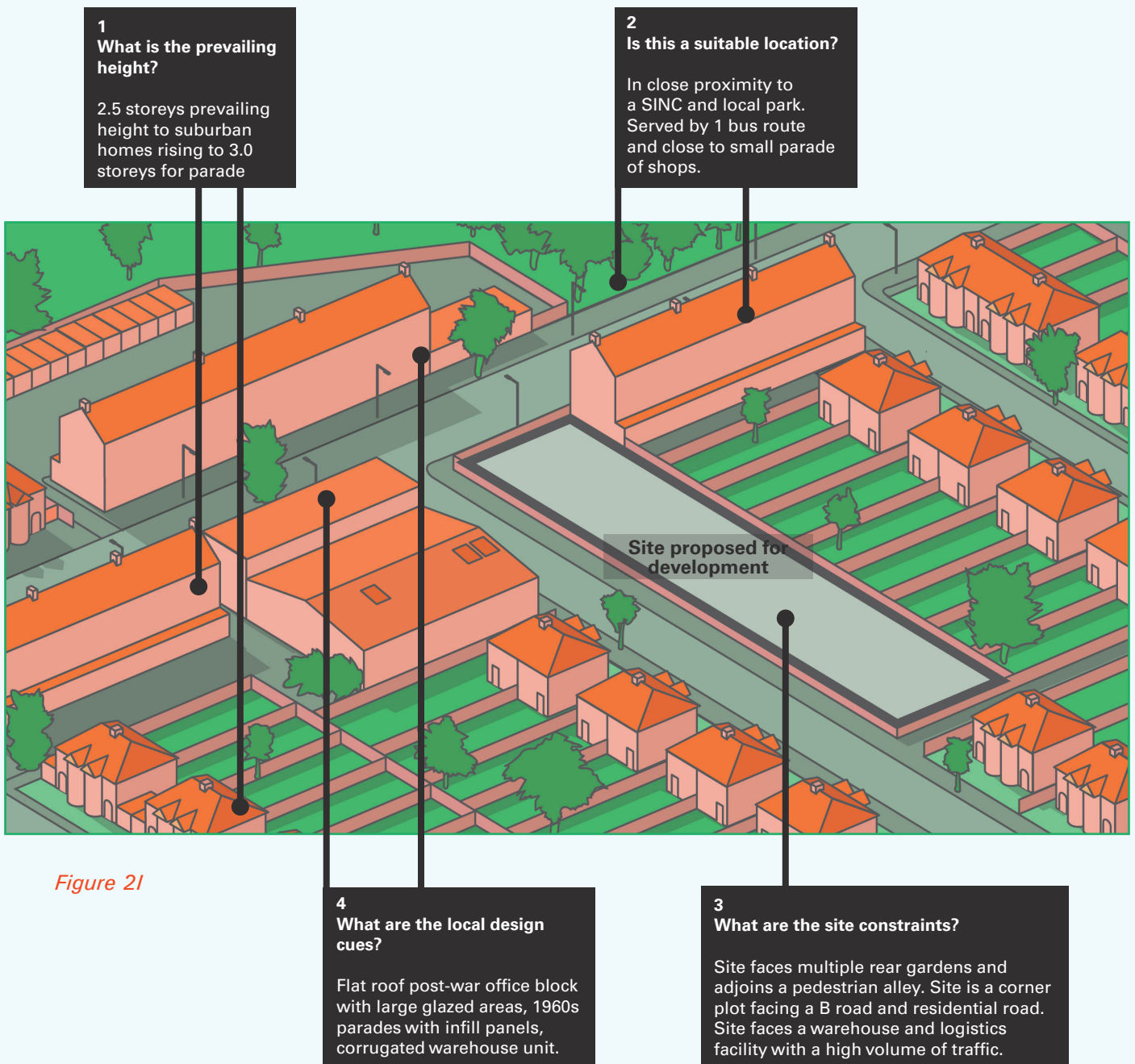


Figure 21

# What is a tall building?

## 2.4

### The London Plan definition of tall

2.4.1 The London Plan 2021 defines a tall building as being **not less than 6 storeys or 18 metres as measured from ground to the floor level of the uppermost storey**. Buildings which meet

this threshold will be required to follow design guidance as set out in Policy D9 of the London Plan.

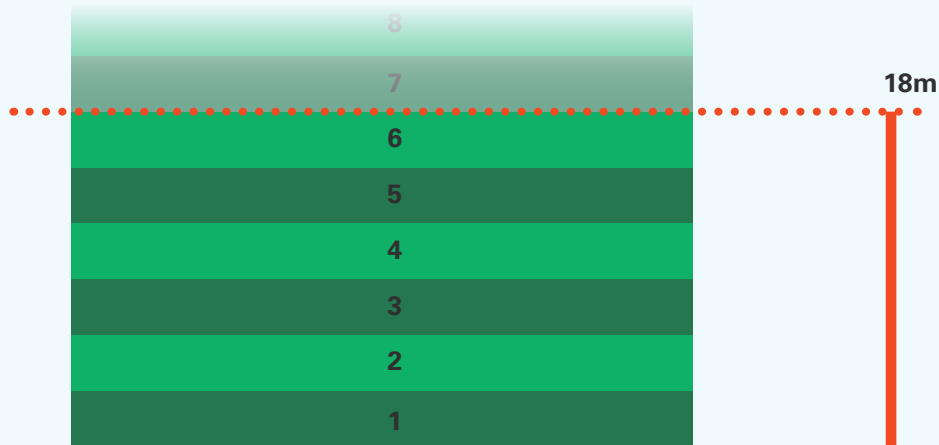


Figure 2J

The threshold at which a building becomes a tall building as defined by the London Plan 2021

# What is a contextually high building?

## 2.5

### LB Harrow's definition of contextually high

2.5.1 Following an assessment of the suburban context as detailed above, the following formula assists in providing a definition as to whether a proposed building would be a 'contextually high building' within a suburban location.

2.5.2 The formula below defines a contextually high building as being **equal to or greater than twice that of the prevailing height of an area**. This definition is separate to the London Plan 2021 definition of a 'tall building'.

CH = Contextually High  
P = Prevailing height

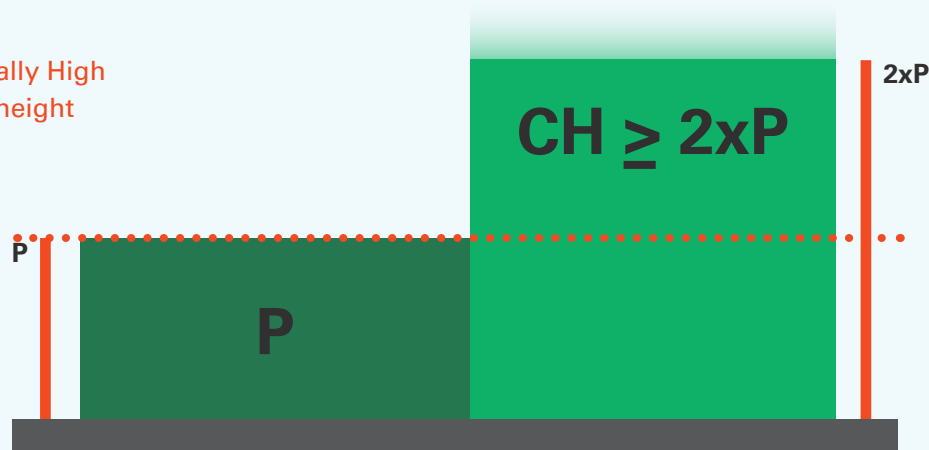


Figure 2K

Formula to define contextually high height within a given area



## What does a contextually high building look like?

2.5.3 A contextually high building is taller than the prevailing heights of its local context and has the potential to cause a significant visual impact on the skyline.



A proposed building height which matches that of its prevailing context presents the least impact on an area and more easily visually integrates with its immediate and wider contexts.



A proposed building height which is one and half times that of its prevailing context presents a moderate impact to its immediate and wider visual setting, with the character of an area likely to be affected.



A proposed building height of two times that of the prevailing height (contextually high) will have a significant impact on its wider setting and a potentially detrimental impact on the character of an area.

Figure 2L

## Upward extensions under permitted development

2.5.4 In certain circumstances, upwards extensions of buildings maybe possible under permitted development rights (see The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended or replaced) ('GPDO').

2.5.5 The methodology for a context-based definition of a high building is intrinsically dependent on prevailing heights. It is noted the propensity for single and two storey upward extensions under permitted development may well gradually increase the prevailing height, though this should not have a dramatic impact due to the interquartile range eliminating the impact of outliers; and the fact neighbourhoods and town centres comprise multiple different typologies, many of which are unlikely to qualify for these new permitted development rights.

2.5.6 Where upwards extensions are proposed under permitted development, these must have regard to the guidance within this SPD to the extent covered by the criteria set out in the GPDO.

2.5.7 For example, recent planning appeals have concluded that whether the external appearance of a dwelling is acceptable is inherently linked to how it would be seen in relation to neighbouring buildings and the wider street-scene or landscape. Therefore, the impact of a development on the character and appearance of an area is a material consideration, and the guidance contained within this SPD will assist proposals coming forward under the GPDO.

## Flow diagram for developing design proposals for contextually high buildings

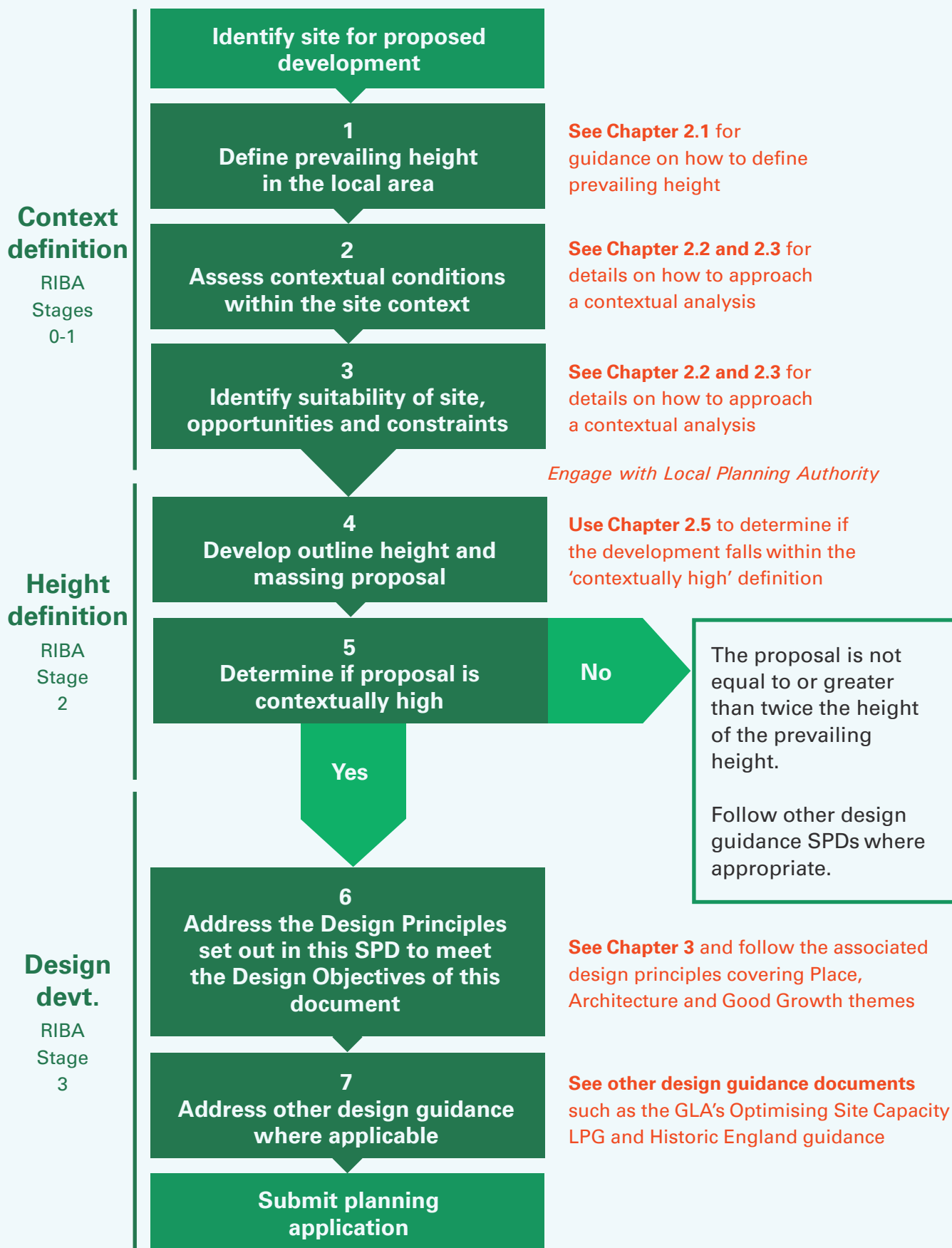


Figure 2M

## Summary

2.5.8 The guidance within this chapter provides assistance in determining what is a tall building as set out in the London Plan (2021) or contextually high building in relation to its suburban context. It does not provide any presumption in favour or against a scheme at

this stage. The remainder of the guidance set out within the SPD (and development plan) must be followed before a determination is able to be made on the acceptability (or not) of a proposal.

3.0

# Design Objectives and Principles

3.1.1 Successful proposals must follow the following design guidance detailed in Chapter 3 of this Tall Buildings (Building Heights) SPD. Design guidance is divided into three overarching themes: **Place, Architecture and Good Growth**. Within these themes are **9 Design Objectives**

3.1.2 (A-I) which are addressed by a number of **Design Principles** to ensure good design is delivered. These principles explain how proposals should approach the design of contextually high and tall buildings.

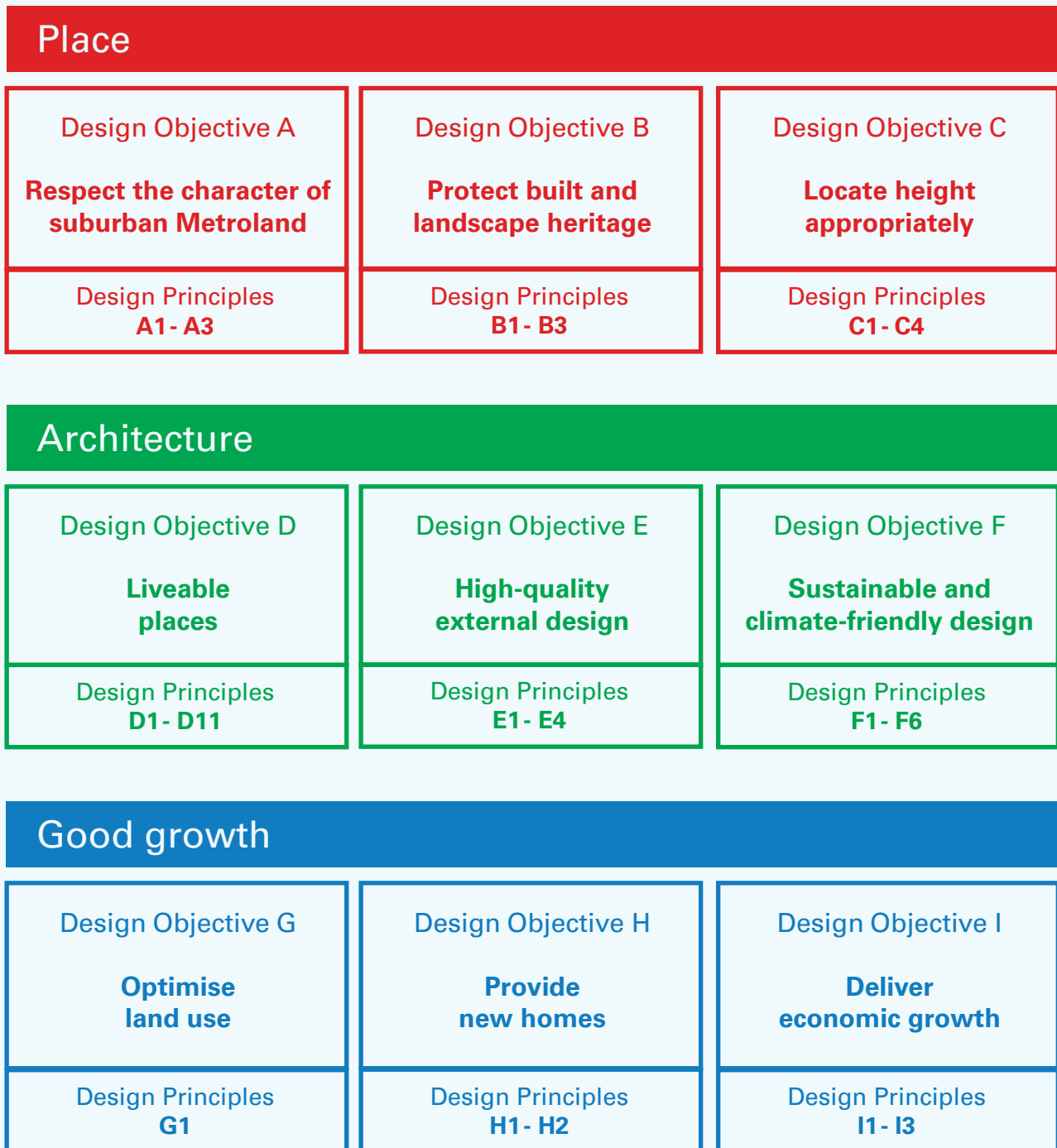


Figure 3A

- 3.2.1 Place is the interconnected web of buildings, public and private spaces, natural features, activities and uses, and routes which form the areas we use everyday. These elements combine to create a unique character and identity for an area.
- 3.2.2 Understanding place is essential in ensuring that new developments respond appropriately to its suburban location and to preserve and strengthen the character of its context .
- 3.2.3 An understanding of place is essential in ensuring that new development responds appropriately to its suburban location and that the unique qualities of areas are preserved to strengthen a sense of place.

*Figure 3B*



The London Borough of Harrow is made up of local areas and neighbourhoods with unique and varied characteristics. Rayners Lane for example, is composed of buildings from many different periods, with a strong Metroland 1930s character as a result of its station, parades and wide streets.

- 3.3.1** Much of Harrow is made up of suburban areas of housing created by the expansion of the Metropolitan Line in the early 20th century. This form of development has created this part of West London's character: 'Metroland'. Metroland is characterised by low-density suburban inter-war housing with large gardens and building heights of two to three storeys for dwellings. Housing is often interspersed with interwar shopping parades and district centres which are typically three to four storeys in height.
- 3.3.2** Proposals that do not respect the pattern of existing development can have a negative impact on the character of suburban areas and erode a sense of place.
- 3.3.3** Chapter 2.1 shows how a detailed context analysis must be carried out when proposing development in Harrow. Development proposals within suburban areas which are taller than the prevailing height will need to be supported by a robust context analysis.
- 3.3.4** In developing proposals that respect the character of suburban areas, applications will need to consider impacts on garden land, a prominent feature of the suburbs of Harrow. Many forms of development on garden land in Harrow are resisted through the Harrow Core Strategy (2012), and with further guidance set out in the Harrow Garden Land Supplementary Planning Document (2013). Proposals will be required to comply with the guidance in these documents.
- 3.3.5** In almost all instances, proposals that meet the definition of a 'tall building' within Policy D9 of the London Plan (2021) (at 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey), will not respect the character of Harrow's suburban areas. Such proposals will not generally be supported. Exceptional circumstances must be demonstrated for such proposals, which must also demonstrate compliance with the design principles in this SPD.

*Figure 3C*



Suburban Metroland features areas of low-density suburban housing, with large gardens and spacious and verdant streets and pedestrian routes. Many dwellings feature natural materials and Arts and Crafts or Art Deco architectural motifs.

*Figure 3D*



Residential suburbia is punctuated by shopping parades, typically in close proximity to Underground or Overground stations. Belmont Circle is an example of Harrow's suburban parades, which feature a low-density mix of shops and amenities as well as housing.

## Development relates to the existing pattern of suburban development

- 3.3.6 Proposals in suburban locations must demonstrate an understanding of their context. Proposals must ensure they respect the suburban pattern and characteristics of areas, as those which do not have the potential to cause harm. Proposals which cause excessive harm are unlikely to be supported.
- 3.3.7 Proposals must be supported by a robust context analysis which identifies the qualities of the existing pattern of development. For

example: built grain, building scale, building lines and street proportions.

- 3.3.8 All proposals must respond to these contextual attributes and demonstrate how any proposed building footprint, height and massing would be appropriate to an area.
- 3.3.9 Applicants must also ensure that proposals align with design principles within the Garden Land SPD and any other relevant SPD .

Figure 3E



Suburban areas can accommodate increased density when new development is sensitive to the prevailing pattern of suburbia. Ordnance Road in Enfield by Peter Barber Architects shows how a moderate increase in density can positively contribute to a suburban corridor and respect existing typologies.

Figure 3F



Becontree Avenue by Archio shows how an apartment typology can sensitively coexist amongst semi-detached suburban housing. Referential roof forms and material palettes help this development integrate with its setting.



### Increased height is proportional to local prevailing heights

- 3.3.10 Proposed massing has the potential to cause harm to the character of suburban areas when there is a significant difference between the proposed height and prevailing heights.
- 3.3.11 Proposed building height must respect existing (and consented) prevailing heights within their context. Defining contextually appropriate will depend on an assessment of prevailing heights and the character and built grain of an area. For example, an area with varying building heights may be able to accommodate greater height than areas which are more uniform in height.
- 3.3.12 Increased height can be achieved sensitively through a gradual increase in height over prevailing heights. For larger sites in suburban areas, a series of incremental increases in height can create a less-disruptive transition between a low-density context and a higher-density development.
- 3.3.13 Massing at site edges and boundaries must respond to neighbouring heights. Increased height at site edges, specifically in suburban locations, can create overbearing impacts and harm neighbouring amenity.
- 3.3.14 Where proposals meet the definition of a tall building as set out in Policy D9A of the London Plan (2021), applicants must demonstrate compliance with the considerations set out within Policy D9C of the London Plan (2021).

Figure 3G



The outline masterplan for Grange Farm, South Harrow by Hawkins Brown shows how a new large-scale development can integrate with a range of contexts by varying height and massing across the scheme. Height is stepped down from taller apartment blocks in the site centre to the edge of the site, with new townhouses creating a gradual transition to areas of existing two-storey dwellings beyond.

- 3.4.1 Much of Harrow's built heritage can be found in clusters around its historic centres such as Pinner and Harrow on the Hill and its stations such as Rayners Lane and Stanmore. Conservation Areas help protect notable areas of period architecture and Statutory Listed Buildings highlight a range of period buildings such as medieval churches, Art Deco stations, libraries and cinemas.
- 3.4.2 Landscape and townscape contribute to the borough's spacious character. Mature parkland and woodland create a strong sense of place in areas like Canons Park and Hatch End, while protected views of St Mary's Church, Harrow on the Hill form uninterrupted vistas across the borough.

Figure 3H



Harrow features a diverse heritage landscape, with assets spread throughout the borough, from Conservation Areas to individual buildings and registered parks. Harrow-on-the-Hill includes a significant number of period buildings and commanding views to St Mary's Harrow on the Hill form a vital part of the borough's overall character.

## Development responds sensitively to heritage assets

3.4.3 Proposals can cause harm to the significance of heritage assets and their settings when inappropriately designed. All developments within the setting of a heritage asset must demonstrate consideration against the relevant Conservation Areas. Management Plans and Design Guides. Designated and non-designated heritage assets need to be considered, including:

- **Conservation Areas**
- **Local Areas of Special Character**

- **Nationally Listed Buildings**
- **Locally Listed Buildings**
- **Scheduled Ancient Monuments**
- **Historic Parks and Gardens (Registered Parks and Gardens and locally listed parks)**

3.4.4 When proposals are located close to heritage assets, a highly sensitive approach to height, building form and material use must be followed to ensure new development complements heritage assets and does not detract from their heritage value.

Figure 3I



Figure 3J



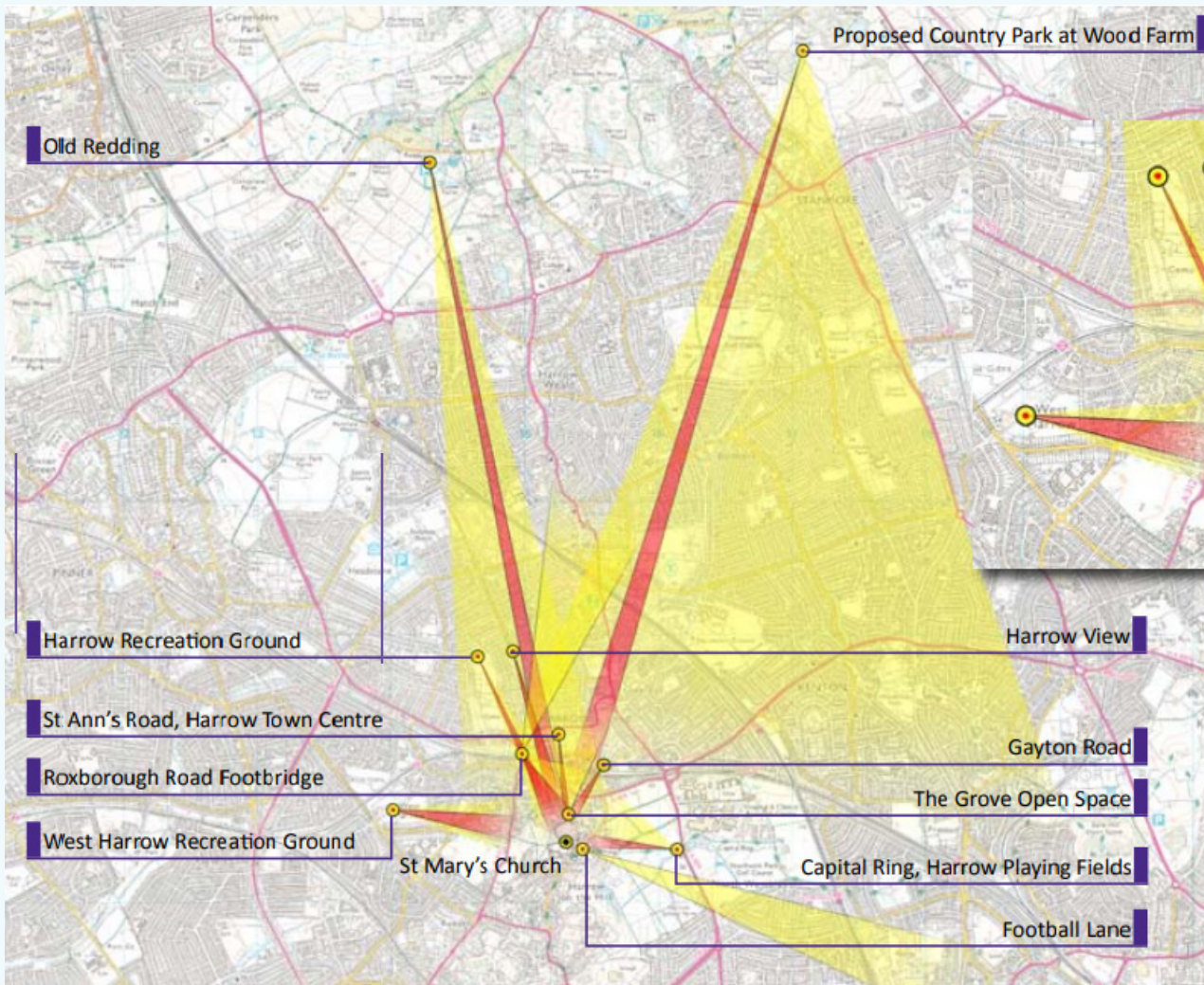
New development can enhance existing heritage assets. New housing at Bentley Priory sensitively responds to the listed buildings and Registered Park and Garden at the site through appropriate scale, sensitive and referential material choice and neoclassical-inspired elevations. This allows for the addition of new homes whilst not competing with or detracting from the nearby designated heritage assets.

## Development responds sensitively to protected views

3.4.5 Viewing corridors and associated policy seeks to protect views of St Mary’s Church, Harrow on the Hill. Applications must address policy requirements and guidance in Policy DM3 (Protected Views and Vistas). Height thresholds apply to developments within viewing corridors.

3.4.6 Proposals that are located within the landmark viewing corridor (shown in red in the Harrow policy maps), should not exceed specified height thresholds. In the event that they do exceed the height thresholds, the development must demonstrate exemplary architecture and enhance the view. Development in the wider setting (shown in yellow in the Harrow policy maps) should form an attractive development.

Figure 3K



Harrow’s protected views centre on St. Mary’s, Harrow-on-the-Hill which the metropolitan centre sits to the north of this important heritage site.

### Development preserves Harrow's historic landscapes and open space

- 3.4.7 Harrow has a verdant character with a rich network of open spaces. Reflecting its location at the upper reaches of the London basin, there is a general rise in levels in from south to north, with a number of notable topographical features across the borough.
- 3.4.8 Buildings located next to publicly accessible open space (regardless of its designation) can have a detrimental impact on the quality and use of that space by local people.
- 3.4.9 Because of this, new development should not impede local street or parkland views and vistas, and should protect the open quality and amenity of parks, the Green Belt, Metropolitan Open Land and other Public Open Spaces.

Figure 3L



Harrow's heritage is not limited to buildings or structures. Canons Park is a Grade-II registered park just north of the underground station of the same name. Resident enjoyment of the park and its character as a heritage asset are influenced by its open and verdant qualities. Proposals must allow for the preservation of such landscapes and amenity and must not impede or compromise the open quality and amenity of such spaces.

- 3.5.1 Proposals must be sited in appropriate locations. Appropriateness relates to the sustainability and suitability of a location. Inappropriately located proposals can harm built character and negatively impact the people who live, work in or visit an area.
- 3.5.2 Applicants must consider the following factors when assessing the appropriateness of height in relation to context.

*Figure 3M*



Elements of height can be accommodated in lower density but sustainable areas. Church Walk in Hackney by Mikhail Riches architects shows how stepped massing can allow for greater elements of height, whilst still successfully transitioning between lower-density residential areas.

### Sustainable locations

3.5.3 Proposals should principally be located close to social, commercial and transport infrastructure (such as shops, public spaces and public transport links). Concentrating development in these locations makes best use of existing service and infrastructure networks and reduces pressures on other areas. Elements of sustainable locations include proximity to:

- **Town or local centres**
- **Public open space**
- **Bicycle routes**
- **Public transport routes**
- **Railway stations**
- **Movement corridors**

3.5.4 Many suburban areas in Harrow are not in close proximity to the above elements. Careful planning and justification for proposals will therefore be required.

Figure 3N



Higher density development is most suitable in locations which have good access to transport, shopping and amenities. Marsh Road in Pinner is a retirement living development in close proximity to Pinner Underground Station and to the shopping areas of Bridge Street and High Street.

## Design Principle C2

### Prominence and townscape impact

3.5.5 Proposals have the potential to cause harm due to being overly prominent. Proposals must assess the townscape impacts of height and massing by identifying key short, medium and long range views. 3D models must be shared with planning officers to allow for a full assessment of proposed height and townscape impact by the LPA.

3.5.6 Proposals can assess such impact through a Townscape and Visual Impact Assessment (TVIA), which 3D models proposals in their context using:

- **Zones of Theoretical Visibility Testing (ZTV)**
- **Accurate Visual Representations (AVR)**
- **Verified views analysis**

### Wayfinding and legibility

- 3.5.7 Proposals must justify why proposals of lower height are unable to be progressed through a clear design rationale.
- 3.5.8 Where proposals exceed the prevailing height of a given context, clear townscape merit for this additional height must be demonstrated.
- 3.5.9 Proposals should reinforce and improve the

legibility of the street pattern for pedestrians.

- 3.5.10 In appropriate locations, elements of height can strengthen the identity and focal points of areas and centres. However, proposals should not seek to identify themselves through height alone as wayfinding can be achieved through material use and signage.

Figure 30



Stanmore Place features well-delineated front elevations to residential blocks and clear areas for pedestrians and vehicles within the street scene. Lighting and a lots of habitable room windows facing the street create a feeling of safety and the street width and distances create a spacious but domestic atmosphere.



## Orientation and neighbouring sites

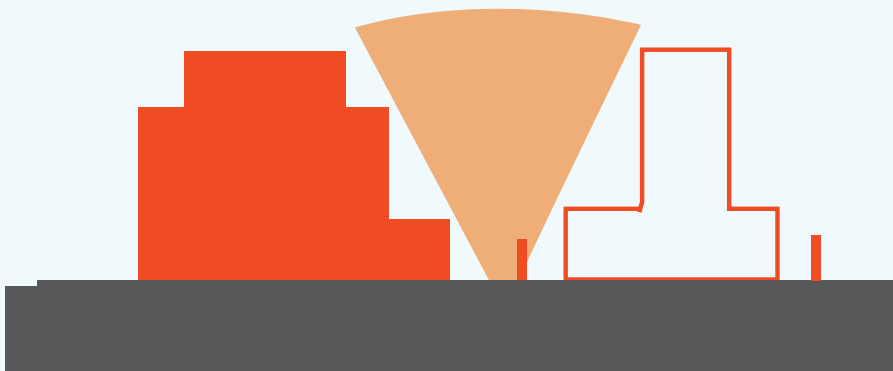
3.5.11 Proposals have the potential to cause harm to adjoining properties due to poor siting of massing and window openings.

3.5.12 Height and massing must be located with regard to the proximity and outlook of neighbouring buildings, minimising harm caused through overbearing and loss of light and outlook.

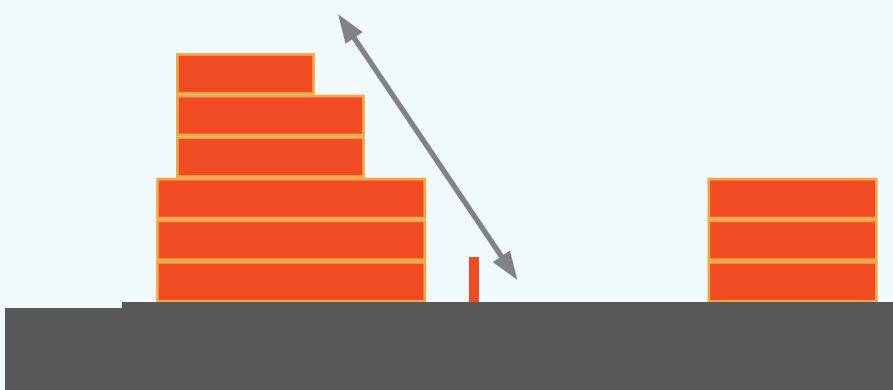
3.5.13 Proposals can mitigate against these impacts through the orientation of elements of height

within a site, by offsetting from boundary lines and by stepping back massing of taller elements.

3.5.14 Orientating outlook and aspect away from neighbouring sites can ensure that harm through actual and perceived overlooking or a loss of privacy is satisfactorily mitigated. Doing so can also reduce the likelihood of adjoining sites being prejudiced from future development and can contribute to active frontages to streets.



Massing is positioned on site so as not to prejudice development on neighbouring sites by setting back from shared boundary lines and tapering massing to allow for greater daylight and sunlight.



Height is positioned to respect views from habitable room windows of neighbouring buildings and massing is stepped back from boundary lines to reduce overbearing.

Figure 3P

- 3.6.1 Architecture encompasses not only the external appearance of buildings, but how they integrate with their immediate settings, including public realm and outdoor spaces. It also extends to the internal design and layout of buildings, including private and communal spaces and the configuration and spatial qualities of private spaces. High quality architecture is essential in adding richness to the borough through facade design, elevations and material use, and also in providing quality spaces for people to live and work.
- 3.6.2 Proposals which exhibit poor architecture can harm an area's character and negatively impact the perception of that area. By contrast, well-resolved and rich architecture can add to the vitality of the borough's built environment and contribute to a rich and varied townscape.

*Figure 30*



Architectural features can positively enhance buildings and the areas they sit within. This flank elevation to Greenstock Lane features stack-bonded brick banding, enlivening what would otherwise be an overly plain elevation.

3.7.1 The lived impact of proposals can be felt by those who live and work in them, as well as those who live in their vicinity or who simply walk past them. Proposals should contribute to creating liveable places for all users of an area. Increased density can be delivered in tandem with improvements to local people's quality of life.

Figure 3R



Liveable are ones where people of all ages can feel at home and where they have enough space to rest, play and enjoy outdoor and indoor spaces. A football game in the shared courtyard of Lyon Square, Harrow.

## Human scale at ground floor level

3.7.2 Proposals can appear imposing to pedestrians and the design of the ground floor element is critical in ensuring that taller elements integrate with pedestrian use.

3.7.3 Ground floor frontages and entrance features should not be overly dominant or overbearing within the street scene and should respond to ground floor massing and architectural

features within the wider context. For example, a setback above ground floor level can create a more approachable ground floor volume for pedestrians and reduce the overbearing quality of proposals in the street scene.

3.7.4 Principle E1 provides guidance on the design of the base and ground floor of proposals.

Figure 3S



Tall buildings can often appear alienating or overbearing when viewed from ground level and can compromise pedestrian experience. The Palm House in Wealdstone by Hawkins Brown features a clearly defined ground floor with a different material type to the rest of the building. This helps to break up the perceived height of the building and also provides a more welcoming elevation, with large ground floor windows creating connection between the interior and outside.

## Overbearing and overlooking

- 3.7.5 Proposals must ensure that the amenity of adjacent internal and outdoor spaces are not compromised due to overlooking and overshadowing.
- 3.7.6 As part of any character analysis, especially in suburban areas, care must be taken to ensure that the massing of proposals does not result in overbearing on adjoining sites. Overbearing can be addressed through reductions in height or by locating massing away from neighbouring sites.
- 3.7.7 Proposals can negatively impact neighbouring

residential amenity through actual or perceived overlooking. The amount of window openings, private balcony design, fenestration design and elevated communal amenity spaces can cause significant harm to the privacy of neighbouring residents and users. These features must be sensitively arranged to ensure that overlooking is minimised.

- 3.7.8 Proposals which fail to satisfactorily address overbearing and overlooking concerns will not be supported. Refer to Principle C4 for measures to address overbearing and overlooking.

Figure 3T



Proposals can significantly impact neighbouring buildings when they are of an overly large scale or feature numerous windows. Templar House in South Harrow is significantly larger than neighbouring buildings. In contrast, The Rye by Tikari Works is appropriately scaled and has limited habitable room windows to its flank elevations, limiting overlooking.

## Public realm

3.7.9 To achieve a well-integrated development, proposals must demonstrate a public realm strategy which successfully integrates with the surrounding built grain and wider context.

3.7.10 Proposals must demonstrate a high quality public realm strategy which:

1. **Allows for and improves connectivity with the wider area;**
2. **Creates pedestrian permeability through the site;**
3. **Provides a clear hierarchy for pedestrian, cycle, vehicle and servicing users;**
4. **Is accessible for all ages and physical abilities;**

5. **Supports biodiversity and sustainability through planting and natural, permeable and durable materials;**
6. **Improves the wider area and neighbourhood amenity through quality material use, street furniture and incidental play where necessary;**
7. **Provides opportunities for the integration of public art should be investigated at early design stage.**

3.7.11 The Design and Access statement must be supported by a detailed landscape strategy including management and maintenance proposals to ensure that landscaping and public realm is maintained.

Figure 3U



Successful public realm can feature a mix of planting and hardscaped areas and encourage interaction between users of a development and passers-by.

## Residential amenity

- 3.7.12 Proposals can deliver a large number of homes, leading to many people occupying one site. Whilst height can be appropriate in some locations, and can ensure an effective use of a site, this must not be to the detriment of future occupiers amenity.
- 3.7.13 Proposals must meet nationally described minimum space standards for new dwellings. Dual aspect homes should be sought for all homes to ensure future occupiers benefit from satisfactory outlook, levels of natural light and the ability to passively ventilate homes. North-facing single aspect units will not be supported.
- 3.7.14 Where height is proposed, access to meaningful amenity space is fundamental. All homes must provide enough private amenity space to comply with the London Plan (2021) as a minimum. Private amenity space must preserve resident privacy and attention should be paid to balustrade treatment. At higher levels, inset balconies can assist in reducing excessive wind to such spaces while creating a greater sense of enclosure.
- 3.7.15 Communal amenity space such as gardens or courtyards should be considered at an early design stage. Communal amenity space should be useable, functional and identifiably open for all occupiers. Flat roof space can be used as communal amenity space where minimal actual and perceived overlooking results. Scrutiny will be placed on user safety measures for such spaces.
- 3.7.16 Proposals with family-sized homes must ensure children's play space is provided in accordance with London Plan (2021) requirements of 10sqm per child. Play space must provide for a range of ages and have good access to natural light and passive surveillance. Level access should be provided with a range of play equipment to ensure an accessible offer. All play space must be tenure blind and freely accessible to all children living in the development. Proposals should ensure that play spaces can be easily accessed from family-sized homes.
- 3.7.17 Fenestration design should ensure adequate levels of sunlight and daylight are received into all new homes, whilst protecting the privacy of future occupiers and existing residents. Harrow Planning Application Requirements indicates that a statement should be provided with any building that exceeds four storeys in height where adjoining other developed land or public open spaces. Proposals requiring such a statement must demonstrate compliance with the relevant BRE Standards.
- 3.7.18 Where mixed-use developments are proposed, a clear separation of uses must be provided, with a separate access for each use and clear delineation of uses to frontages. Separate servicing arrangements will be required and should not compromise residential amenity.

Figure 3V



Figure 3W



Successful shared amenity space should be multi-generational, with dedicated space for children and adults. Play space that is integrated within a landscaping strategy can create unique play features, such as this playground by muf.



## Design Principle D5

### Transport and parking

- 3.7.19 Higher occupancy levels for proposals may place increased demand on transport infrastructure. Proposals that result in a higher yield of activity should be located in areas which are well-connected to public transport. Locating proposals in such locations will reduce reliance on private motor vehicles and on the road network.
- 3.7.20 Car free development is encouraged in well-connected locations. In all cases London Plan (2021) parking standards will apply including requirements for disabled persons' parking, electric vehicle charging spaces and cycle parking.
- 3.7.21 Proposals should ensure dedicated servicing bays are provided to meet site use and future occupant requirements. This includes online shopping and grocery deliveries as well as the delivery of larger bulky items. An assessment of the servicing requirements for a development must be undertaken to determine the number of servicing bays required. Dedicated servicing bays should be provided off the highway where possible and meet Highways Authority requirements.
- 3.7.22 Where a basement, undercroft or service yard are proposed, these shall not prejudice pedestrian safety or personal security. Controlled access to these elements of a development should be provided to prevent unauthorised access and antisocial behaviour, particular during night-time hours.
- 3.7.23 Cycle parking and cycle stores must be easily accessed by all residents and users and should typically be accessed from within the main entrance core for convenience. Stores should not exceed space for 70 cycles. For larger stores, multiple enclosures of this size should be provided to counter cycle theft.
- 3.7.24 Cycle stores which are directly accessed from the street are unlikely to be supported as they have a higher risk of trespassing and are less convenient for users. For more guidance please refer to London Cycling Design Standards (Chapter 8) or any superseding guidance; <https://content.tfl.gov.uk/lclds-chapter8-cycleparking.pdf>

## Design Principle D6

### Servicing and waste collection

- 3.7.25 Proposals can have difficulty accommodating space for waste infrastructure. This can affect both new buildings and existing retrofitted or extended buildings.
- 3.7.26 Mixed-use proposals must demonstrate separate waste provision for residential and non-residential waste, at a level which meets the needs of each quantum of use proposed.
- 3.7.27 Refuse collection must provide inclusive access for all in accordance with current legislation and be located in intuitive locations for ease of use. Drag distance for waste operators must be in accordance with the London Borough of Harrow Code of Practice for Waste & Recycling Strategy.
- 3.7.28 Refuse store locations should not compromise the provision of active frontages and should not typically be located on main roads or busy routes.
- 3.7.29 Further to the above guidance, applicants should also refer to the London Borough of Harrow Code of Practice for Waste & Recycling Strategy.
- 3.7.30 Electric and gas meters should be sensitively placed to ensure these are not visible on principal façades or within the streetscene.
- 3.7.31 Postal theft is a widespread issue across London. Developments should provide delivery lockers and postal boxes internal to buildings as opposed to being externally mounted.

## Design Principle D7

### Designing out crime

- 3.7.32 Proposals should clearly delineate public and private space and a security strategy for communal areas should be in place. Well-defined prevention, evacuation and response strategies will minimise threats from fire, flooding, terrorism, and other situational hazards. If terror protection is considered relevant, the use of bollards, planters or low walls along the perimeter are preferable to taller fences.
- 3.7.33 To achieve a high-quality design and to ensure crime prevention requirements are met, consultation with the Metropolitan Police (Secured by Design) is encouraged.

## Design Principle D8

### Daylight and overshadowing

- 3.7.34 Proposals can significantly reduce the amount of daylight and sunlight to neighbouring buildings, amenity spaces and public open spaces as a result of their massing.
- 3.7.35 By modulating the built form and locating elements of height away from neighbours developments, loss of light impacts can be minimised.
- 3.7.36 Proposals must also demonstrate that adequate daylight and sunlight levels can be provided for all future occupiers within a development, as larger schemes can create overshadowing and reduced light levels between buildings.
- 3.7.37 Proposals that exceed four storeys (including upward extensions to existing buildings) must be accompanied by a Daylight and Sunlight Assessment produced by a suitably qualified professional to demonstrate satisfactory daylight and sunlight levels both for the development and for buildings and spaces surrounding the development. This must be prepared in accordance with the relevant BRE guidance.

## Solar gain

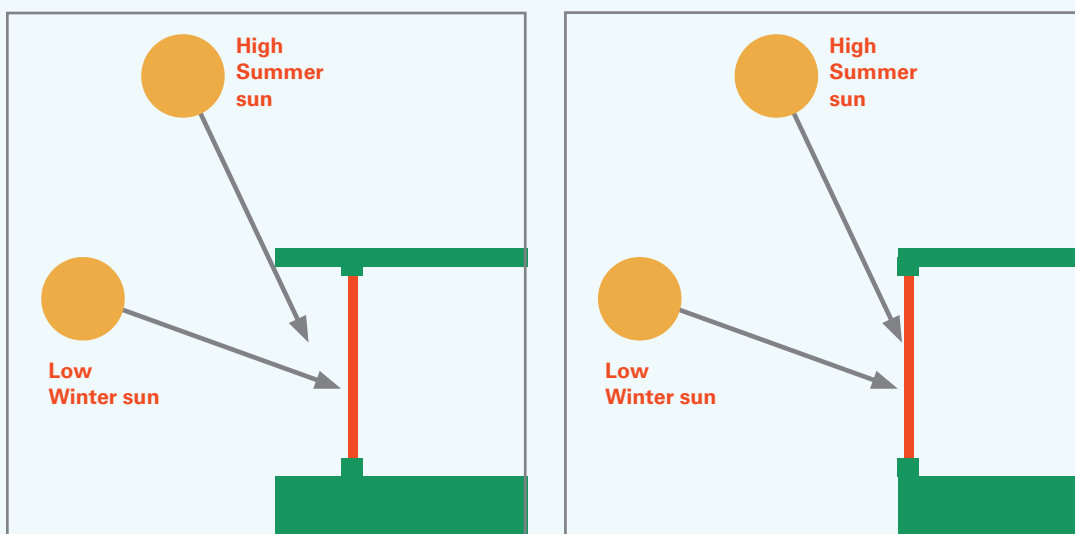
3.7.38 Large amounts of glazing can lead to high levels of heat loss in winter and solar gain in summer - both of which result in additional energy consumption and poor thermal comfort. Glazed areas should be designed to limit space heating demand and peak solar gain while ensuring high daylight levels.

3.7.39 Glazing strategies should have regard for south-facing aspects and mitigate solar gain issues where required. Measures could include the use of deep window reveals, inset balconies for increased shade or reduced window opening sizes.

Figure 3X



Figure 3Y



Buildings should work to minimise large expanses of glazing which might lead to overheating and the reliance on air conditioning systems in summer months. Deep reveals and use of brise-soleil, such as with this example in Barnet, can improve comfort for building users and reduce operational use energy demands.

## Air, noise and microclimate

**3.7.40 Air movement and quality:** Harrow is designated as an Air Quality Management Area, and tall buildings can have an impact on both the movement of air through an area, and on the quality of the air due to the dispersal of pollutants. The health and wellbeing of future occupants can also be affected by proximity to air pollution sources and Applicants should locate homes away from such sources.

**3.7.41** Major applications must be supported with appropriate modelling of the building envelope and its effect on air movement. Consideration of building massing and façade orientation which encourages the effective dispersion of pollutants and avoids adversely affecting street level conditions is required.

**3.7.42** A comprehensive Air Movement and Quality Statement should be provided as part of any proposal, to avoid retrofitting of unsightly design features during or after construction.

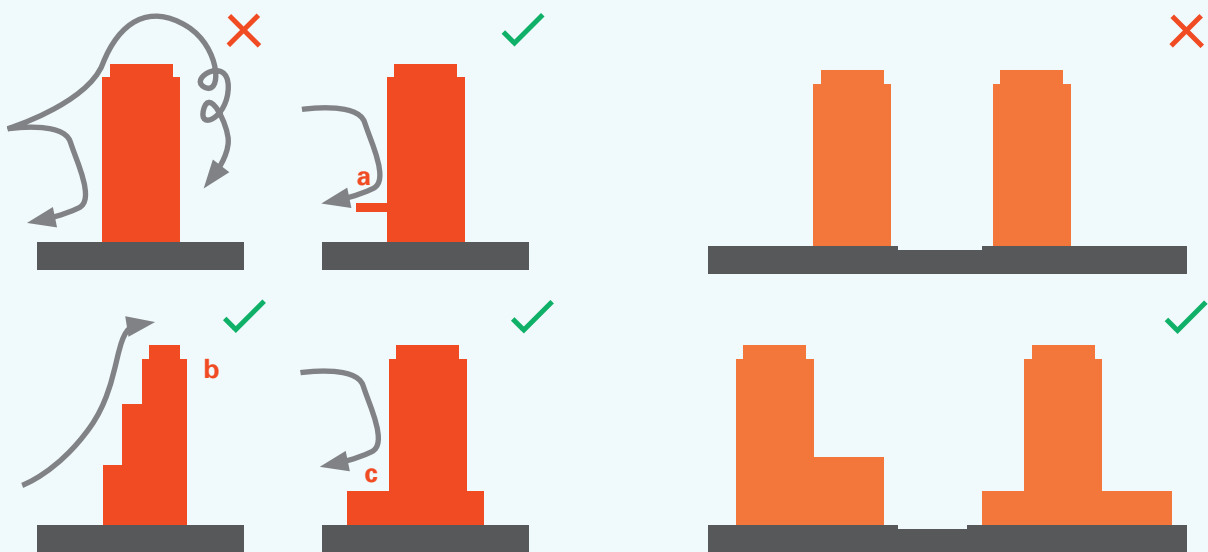
**3.7.43 Noise:** Proposals should consider the potential noise levels created by air movement, building use or operational machinery to maximise the enjoyment of internal and open spaces in

and around a building. The impacts of noise to homes from noise-emitting sources such as industrial sites or major thoroughfares should be fully mitigated against. In the first instance, buildings should be sited away from such sources and habitable rooms should face away. Winter gardens and triple glazing can also assist in reducing noise to homes in certain circumstances.

**3.7.44 Microclimate:** Proposals should provide analyses of the macro- and micro-scale climatic conditions for a site at the earliest possible stage of the design process to ensure that a scheme can mitigate risks caused by wind and other climatic forces on a building and its wider context. Tall buildings should provide microclimate analysis for any public or private amenity space, such as squares, balconies or roof terraces, and the wider public realm including walking and cycling routes, to ensure that such spaces are usable and comfortable.

**3.7.45** Conducting a microclimate analysis while developing massing can allow for integrated solution and reduce the risk of unsightly or expensive remedial measures post-occupancy.

Figure 3Z



Canopies (a), setbacks (b) and podiums (c) can mitigate wake and downwash effects of excessive wind.

Canyon-like rows of tall buildings may increase urban heat island effects. Setbacks and wider street profiles can reduce excessive heat.

## Greening

- 3.7.46 Proposals should introduce meaningful and durable soft landscaping, tree-planting and sustainable urban drainage measures which enhance the natural character of the site whilst providing essential urban greening. Successful green space on a site can provide many benefits to a scheme and its wider context. These include softening the appearance of a development, increasing biodiversity, reducing the urban heat island affect and wellbeing benefits.
- 3.7.47 Designs should consider how a landscape strategy can address multiple aims for a development, such as amenity and play space and biodiversity net gain. Landscaping should be an integral part of the concept design stage and landscape-led masterplans are encouraged for larger sites.
- 3.7.48 Roofscapes can contribute to increased greening of a development and can be jointly occupied with solar technology and planting (known as a biosolar roof).
- 3.7.49 Major applications must meet Urban Greening Factor requirements as set out in Policy G5 (Urban Greening) of the London Plan (2021). Applicants are also advised to review Natural England's Green Infrastructure Framework; <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>
- 3.7.50 Urban Greening is an important factor which allows proposals to reduce their urban heat island effect, which is caused by extensive hardscaped, built-up areas absorbing and retaining heat and increasing the local ambient temperature. The Urban Greening Factor (UGF) is a metric which quantifies the amount and quality of urban greening in a development. Major development are required to reach the minimum Urban Greening Factor (UGF) of 0.4 set by the London Plan (2021).

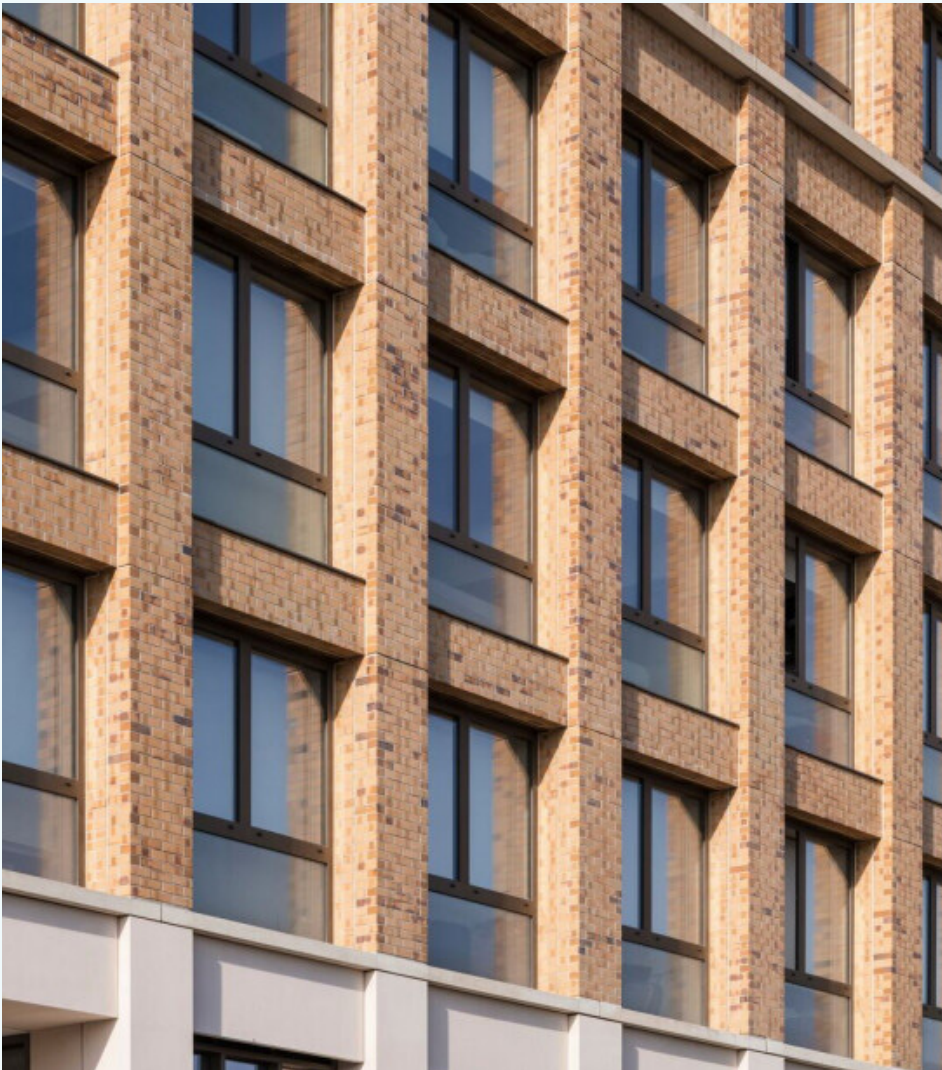
Figure 3AA



An example of a biosolar roof. Greening and solar panel provision for heating and hot water can be co-located on roofspace. Poor use of roof space can contribute to urban heat island effects and limit the amount of communal amenity space. By rationalising rooftop plant and sensitively optimising roof space, greening can become an integral part of environmental and amenity strategies.

- 3.8.1 Harrow has a wealth of unique and characterful architectural assets: from modest, well-proportioned interwar parades to Modernist detached houses and Art Deco mansion blocks. The next generation of development in the borough should respond with equally high-quality external design.
- 3.8.2 Proposals that are architecturally referential to their context and make rich and imaginative use of material and form can assist in developing a contemporary architectural language which is uniquely Harrow-centred.

*Figure 3AB*



The external design of buildings should be rich in its material use and detailing and provide visual interest whilst enhancing and relating to its wider context. The Palm House in Wealdstone features well-resolved elevations, with well-aligned fenestration and expressed frame and varied but harmonious material use.

## Form and composition

3.8.3 Taller buildings are typically comprised of three distinct elements: the top, middle and base. The treatment of these individual elements assists in the overall successful external design of a building. The scrutiny of these elements are more important the taller a building is, as the harm caused by poorly designed elements is exacerbated when the prominence of a building increases.

3.8.4 Modulating building massing to express the base and top of a building can reduce visual prominence. For example, an expressed base with a setback middle can better integrate into existing low-level street scenes and provide a more approachable and human-scale entrance to buildings.

Figure 3AC



Unity Place by Gort Scott features a well-defined base, middle and top to create an attractive elevation with aligned and regularly spaced fenestration.

## Top

- 3.8.5 The building top provides opportunities for new inflection points in the skyline and their shape and impact should be well-considered. This element needs to be articulated as buildings which lack an expressed top can appear incomplete or overly blunt.
- 3.8.6 Rooftop plant should not be visible and should be appropriately concealed as part of the architectural design.
- 3.8.7 The approach to the building top should depend on the role and position of the tall building within its wider context.

## Middle

- 3.8.8 The middle section comprises the main building volume. Its form will directly affect the microclimate of the wider area. Its design should consider the impact on wind flow, ambient heat, privacy, light and overshadowing.

## Base

- 3.8.9 The base is where tall buildings meet the ground and heavily impacts the street experience for pedestrians. Good base design

can create vibrant and visible uses to the ground floor and rich and welcoming entrances to buildings, whilst integrating into their wider built setting.

- 3.8.10 Two general approaches to base design are buildings which sit on a podium base and those which are expressed as part of a continuous volume. The type of base appropriate for a proposal should stem from a context-based analysis.

- 3.8.11 It is important to note that ground floor areas must typically accommodate a wide range of functions including servicing and back of house uses. These should be sufficiently sized without compromising front of house and active ground floor uses.

## Mediating massing

- 3.8.12 Stepped or shoulder massing can be used on larger sites to mediate the overall massing strategy by providing a stepped transition between significantly taller elements and surrounding low-level buildings. Stepped massing elements can assist in creating a gradual increase in scale, limiting the visual contrast between low and tall buildings.

*Figure 3AD*



Nunhead Green in Southwark by AOC and David Miller Architects show how roof forms can be used to articulate the top of a four-storey apartment building.



## Elevation treatment

**3.8.13** It is essential that proposals feature a well-resolved series of elevations, regardless of the prominence of these elevations. As the most visible feature of buildings, successfully articulated elevation design can add richness to townscapes. Five suggested components to successful elevation design include:

### Visual interest

**3.8.14** Visual interest and texture can be provided through rich material use, well-resolved details and feature panels to break up overly blank or inactive areas of elevation.

### Layering

**3.8.15** Richness can be created by breaking single elevations into elements and assembling these to create harmonious compositions. Layered

elements could differ by material or setback

### Harmonious fenestration

**3.8.16** Facade compositions feature clear window opening rhythm. Alignment with balconies and recesses can create a cohesive and attractive elevation.

### Relationship to internal uses

**3.8.17** Where appropriate, facade treatments should relate to and reflect internal functions and uses.

### Evolving existing typologies

**3.8.18** Where appropriate, elevations should relate to prevailing architectural forms and features in their context.

*Figure 3AE*



Kings Crescent Estate by Karakusevic Carson Architects features a wealth of architectural detailing to create visual interest and add depth to elevations, with stepped brickwork creating deep and sheltered reveals for front doors and private balconies aligning with other elements of the elevation.

## Materials and detailing

- 3.8.19 The use of high-quality materials can add value to the character of areas and set aspirations for future development. Proposals will be expected to make use of durable and rich external materials.
- 3.8.20 Material use is a significant contributor to the carbon footprint of developments and measures to reduce the embodied carbon of production and transport, such as by specifying natural and UK- or EU-sourced materials is strongly encouraged.
- 3.8.21 Maintaining external materials and elevations can be challenging for tall buildings given their height. A maintenance strategy for all elevations should be provided to ensure that materials can be refurbished and replaced if necessary. Precedents should show that weathering progresses in an attractive manner.

- 3.8.22 External materials use can help relate new development to existing buildings in an area. An assessment of local material palettes and architectural features should be conducted as part of any application (Chapter 2.1), as this can allow for material and detailing references to become part of the design proposal.
- 3.8.23 Refined detailing creates a quality external appearance. Simple but well-resolved measures around thresholds, reveals and junctions can contribute to the overall quality and visual interest of a development. Imaginative detailing can also be used to create feature elements of buildings, such as around entrances, to soffits and balconies and to structural elements like columns.
- 3.8.24 High quality detailing can also result in an improved build quality and reduced maintenance.

Figure 3AF

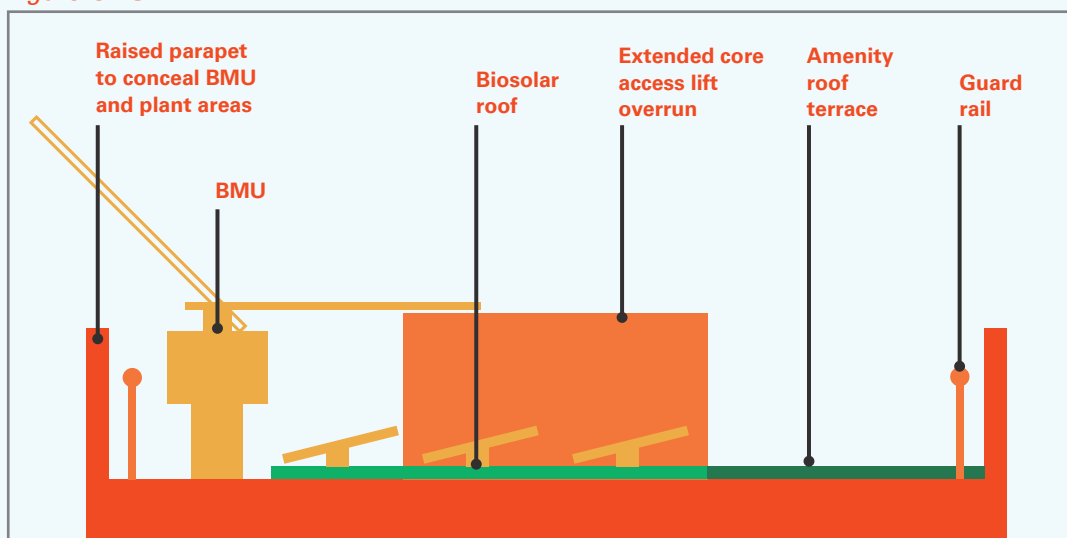


Materials should be specified which are robust, hard-wearing and age well. Brick, stone and other natural materials are typically more appropriate than composite materials. Light-coloured render should be avoided due its likeliness to stain and spall.

### Roofscapes

- 3.8.25 Roofscape design should be considered early in the design process as roofscape uses can affect the appearance of a building and can contribute to wider policy objectives such as the Urban Greening Factor.
- 3.8.26 Roofscapes serve as a termination to proposals and are the most visible element of a building, often seen from many miles away. As such, roofscapes have a considerable impact on the character of areas. Proposals should differentiate roofscapes through form, materiality, detailing or a combination of these. The design of roofscapes should not however, exacerbate overbearing impacts.
- 3.8.27 Successful roof design should optimise space to accommodate various uses.
- 3.8.28 Solar technology and urban greening are two appropriate uses for roofs, and can add planning benefit to a scheme. Proposals which do not make best use of roofscapes will not be supported unless clear design rationale is provided, such as for pitched roofs.
- 3.8.29 Ancillary plant equipment, window cleaning hoists and aerials must be grouped and screened to ensure they do not detract from the roofscape. The ability to climb onto parapets or balustrades must be minimised through effective barriers. This can prevent falls from height.

Figure 3AG



This roof section indicates the variety of rooftop components and uses which must be screened

## Design Principle E5

### Active ground floor frontage

- 3.8.30 Active ground floor frontage has uses for both the building and the street: providing practical internal uses such as communal lobbies and commercial space, while also providing animation to street scenes and helping pedestrians feel safer through passive surveillance.
- 3.8.31 Proposals in suitable locations should incorporate non-residential or communal ground floor uses to create activity and interest for pedestrians. Local services, shops and community uses are often suitable for ground floor use and should be pursued where appropriate.

3.9.1 Proposals should constitute sustainable development, particularly in response to the climate emergency. The London Plan (2021) requires major applications to achieve zero-carbon firstly through on-site measures, and where not achievable on site, financial contributions to offset reductions off-site. Early consideration of sustainable design technologies and solutions should be factored into proposals for tall and contextually high buildings. Construction methods should look to reuse materials and also reduce the amount of waste from the construction process.

*Figure 3AH*



Sustainable design can often be invisible to passers-by. Agar Grove in Camden is an example of a contextually high development which is Passivhaus accredited and highly energy efficient.

## Sustainable construction

3.9.2 Sustainable construction methods are highly encouraged for new development. Benefits include reducing development carbon footprint and reducing waste through circular economy design.

3.9.3 Proposals should explore the use of low-carbon or zero-carbon structural systems and

reduce reinforced concrete construction where possible and practicable.

3.9.4 Buildings should be designed for disassembly and a clear strategy for material reuse and recycling is expected to be included within Design and Access Statements.



Highly sustainable construction methods, such as mass timber, used here at Dalston Works by Waugh Thistleton Architects, can often be finished in a way which is sympathetic to a site's setting.

### Passive design

- 3.9.5 Proposals are encouraged to adopt Passivhaus design principles to ensure that a fabric-first approach is maximised.
- 3.9.6 Junctions and thermal bridging must be minimised and a high overall U-value achieved. Air tightness, insulation and triple glazing can all ensure that a fabric-first approach is

achieved, reducing demand on heating and cooling.

- 3.9.7 Proposals should ensure that key junctions in the building envelope such as wall to floor connections, window head/sill/jamb and balcony connections are of a high standard and are airtight to ensure minimal thermal loss.”



Agar Grove, Camden by Hawkins Brown is an example of a high quality residential development in an urban location which is Passivhaus accredited.

## Design Principle F3

### Low embodied carbon materials

- 3.9.8 Proposals should seek to use low carbon materials to help reduce development carbon footprint. Materials that use recycled materials, or locally-supplied natural materials will be encouraged to be utilised where appropriate.

- 3.9.9 Site redevelopments which require demolition of existing structures should seek to re-use demolition materials on site where applicable, such as for landscaping.

## Design Principle F4

### Sustainable heating

- 3.9.10 Heat networks should achieve good practice design and specification standards for primary, secondary and tertiary systems comparable to those set out in the CIBSE/ADE Code of Practice CP1 or equivalent.
- 3.9.11 Major applications should seek to deliver communal heat systems for developments, and should follow the selected in accordance

with Policy SI 3 (Energy Infrastructure) of the London Plan (2021). Air source heat pumps are supported in most circumstances, and developments will be expected to follow latest guidance on the most appropriate technology to address this.

- 3.9.12 Proposals should demonstrate the provision to connect to any future heat network systems.

## Design Principle F5

### Sustainable energy

- 3.9.13 Proposals should incorporate zero carbon forms of energy generation. Technologies that generate local clean, low-carbon and renewable energy should be applied where feasible. Justification should be provided to demonstrate where such technologies are not feasible or practical.

- 3.9.14 Proposals should demonstrate the provision to connect to any future district heat network systems, if one is proposed for the wider area.

## Design Principle F6

### Biodiversity

- 3.9.15 Proposals can impact biodiversity through the loss of habitat, the introduction of excessive light at night or prolonged shading during the day. Such impacts are more keenly felt when adjacent to open spaces, regardless of any statutory designation.
- 3.9.16 Proposals should provide biodiversity net gain. Design solutions include habitat or nesting space and biodiverse roofs, as well as other measures.

- 3.9.17 Proposals should enhance and increase biodiversity and reinforce local distinctiveness through landscape character and planting mixes.

- 3.9.18 Opportunities to de-culvert streams and include blue infrastructure where applicable to sites will be supported.

- 3.9.19 Proposals that are detrimental to locally important biodiversity will be resisted.

3.10.1 Good growth is socially and economically inclusive and environmentally sustainable. This principle underpins each of the policies within the London Plan (2021).

3.10.2 Good Growth is based on the following six objectives:

- **Building strong and inclusive communities**
- **Making the best use of land**
- **Creating a healthy city**
- **Delivering the homes Londoners need**
- **Growing a good economy**
- **Increasing efficiency and resilience**

3.10.3 Planning for good growth seeks to ensure that the full range of planning issues are considered when setting out a strategy for growth and development. Good growth seeks to ensure that developments are appropriately located and provide for all in the community, in terms of providing the required number and type of homes, places to work, recreate and socialise. For contextually high or tall buildings, these should represent buildings of high quality design, in sustainable locations, that contribute to the functioning of the location and residents who are present within its location.



**3.11.1** All development must make the best use of land by following a design-led approach that optimises the capacity of sites. Optimising does not mean maximising and efficient land use must also be sensitive to context and provide betterment to an area, whilst housing all required amenities, such as play space. Whilst ensuring efficient use of land, maintaining an area's prevailing character is equally important. Proposals make best use of land in sustainable locations where jobs, infrastructure, and amenities are in close proximity.

## Design Principle G1

### Effective but sensitive use of sites

**3.11.2** Proposals should be design-led and ensure that sites are developed optimally. Underutilised sites within their suburban context will not be supported. In optimising site capacity, proposals must deliver on all other relevant policy requirements within the development plan

**3.11.3** In making effective but sensitive use of a site, development will need to be considered within its context and whether it seeks to reimagine,

repair or reinforce the character of a particular area. Context will determine how a site should be optimised from a building footprint and height perspective as efficient land use should not result in harm to the character of an area.

**3.11.4** Design led proposals should optimise the potential of a site, ensuring that an appropriate level of built development is realised, whilst still ensuring all other policy requirements of the development plan are delivered on site.

3.12.1 Due to the greater amount of floorspace they provide, higher density buildings are often able to deliver a higher quantum of housing than

a lower density development. However, such proposals should be considered exceptional, both in their frequency and design.

### Design Principle H1

#### Proposals contribute to Harrow's delivery of high quality new homes

3.12.2 Residential schemes must ensure that homes are of a high quality in terms of design and liveability for future occupiers.

is unable to make more efficient use of a site and deliver the appropriate quantum of housing.

3.12.3 The delivery of housing is likely to remain a key pressure facing local planning authorities, and delivery of homes will continue to hold weight in planning decisions. However, the delivery of housing will not outweigh unacceptable harm caused by a development within the context in which it would be located. Housing may be able to be delivered in a more sensitive manner where height is more contextually appropriate, and applications should demonstrate a design progression to demonstrate that a lower development height

3.12.4 Proposals must provide an appropriate mix of homes, to provide housing choice for residents. The delivery of homes should be reflective of the context in which they are located as well as the housing need within the borough.

3.12.5 The design of homes' internal and external spaces must be in accordance with minimum housing standards as mentioned in Design Principle D4.

### Design Principle H2

#### Proposals assist in Harrow's provision of affordable housing

3.12.6 Contextually high and tall buildings provide an opportunity to deliver more housing per site / development than a lower density scheme. With this comes the opportunity to deliver affordable housing, for which there is an identified need to deliver within the Borough and across London. All major development of 10 or more units triggers an affordable housing requirement.

housing, both in terms of tenure and size, which will assist in providing mixed and balanced communities.

3.12.8 Where schemes propose an affordable housing contribution less than the policy requirement, applications must be supported by a financial viability assessment to support this position. Schemes will be subject to the relevant review mechanisms.

3.12.7 Proposals should seek to deliver a mix of

**3.13.1** In appropriate locations, development should assist in achieving economic growth. Proposals, even when residentially led, can provide a mix of uses that can contribute to the vibrancy and vitality of an area. Appropriate non-residential floorspace such as retail, cultural or community uses for example, assist in providing a wider offer of uses for residents within an area, and can contribute to the overall functioning of an area and help to create mixed and balanced communities.

## Design Principle I1

### Mixed use development

**3.13.2** Where opportunities permit, such as suburban town (major, district or local) centres, local or neighbourhood parades, appropriate non-residential uses should be considered. This should initially be provided at ground floor level, however proposals for solely non-residential floorspace in such locations will be supported.

**3.13.3** Residential use above employment floorspace can assist in providing mixed and balanced communities, and contributing to the vitality and vibrancy of a suburban town (major, district or local) centre, local or neighbourhood parade.

**3.13.4** Mixed use developments must ensure there is no conflict between the differing uses within a development, ensuring separate access, waste

& servicing, cycle storage and appropriate sound proofing is provided.

**3.13.5** Non-residential uses in a mixed-use development should have consideration for the needs of future residents and existing residents in the wider area and seek to provide uses which cater to both existing and future to ensure social cohesion.

**3.13.6** Proposals for major developments in suburban town (major, district or local) centres / designated parades should be supported with a vacancy strategy to ensure that in the event that an end user is not available upon completion, the space can be occupied by an appropriate meanwhile use to ensure the space does not become inactive.



A new mixed use development in Islington by Haines Phillips Architect with a commercial use on the ground floor and housing above.

### Ground floor employment use

- 3.13.7 In appropriate locations such as suburban town centres, local and neighbourhood parades, employment uses should be located on the ground floor. In such locations, an active frontage should be provided to ensure the street scenes remain animated. Blank or inactive frontages will not be supported and can result in buildings and areas appearing overly hostile and unwelcoming.
- 3.13.8 Residential use at the ground floor will not be supported, as this sends a message that the

town centre or parade is in decline and reduces the vitality and viability of future high street uses.

- 3.13.9 Employment uses, specifically in local or neighbourhood centres will be encouraged as these provide the day to day convenience goods and services for suburban localities, whereby reducing the dependence on travel to more major centres for such items, supporting the local economy and encouraging active means of travel.

## Design Principle 13

### Social and cultural life

- 3.13.10 Harrow's social and cultural infrastructure is concentrated within its network of centres and corridors spread throughout the borough. Such locations are supported by good public transport links. As such, suburban district and local centres and local and neighbourhood parades are ideal locations for future social and cultural uses, which may be housed within contextually high or tall buildings.

- 3.13.11 Proposals can create cultural value for the borough through appropriate social, cultural and community uses. Such uses within proposals can provide greater resilience within town centres, local and neighbourhood parades, and can strengthen the night-time economy, providing a range of uses which can contribute to the vitality and vibrancy of an area. This can enable a mix of residents to use suburban town and district centres.

4.0

# Application Process and Requirements

4.1.1 This section sets out the supporting information requirements for applications where tall and / or contextually high buildings within a suburban context are proposed as part of an application.

4.1.2 All planning applications submitted to the London Borough of Harrow, must provide the relevant information as set out in the Harrow Planning Application Validation Information Requirements (November 2020) or any subsequent versions.

4.1.3 The taller a building is, the greater the potential for harm it can cause to an area. The

following information is required to support an application where a tall building is proposed. In the absence of such information, the Local Planning Authority will be unable to fully appraise tall building applications and the level of harm they may cause.

4.1.4 The following are assessments that are specifically required to be submitted where an application proposes buildings of height. This list is not intended to be exhaustive, and applicants should review the Planning Application Requirements for further supporting documents.

## Supporting assessments for tall or contextually high building proposals

### Microclimate assessment

To understand the impacts that a tall building may have on the local environment, including wind, noise, solar glare.

### 3D Visual Modelling

Modelling must show any proposed tall building within an application site, as well as within the context within which it would sit. This is important to assist in understanding how a proposal would appear within local area and the potential harm it may cause.

### Air Quality Assessment

All new development that exceeds four floors in height shall be supported with an Air Quality Statement. This should set out impacts on air quality and how the proposal would seek to mitigate this.

### Servicing Strategy

A servicing strategy should provide a statement and plan which successfully demonstrates all aspects of how a development is able to be serviced throughout its life.

### Design & Access Statement

Among other elements that a Design & Access Statement should assess and demonstrate, it should undertake an analysis of the prevailing height and context of the area in which the proposal is sought to be located. It should show how the formulae have been applied and if the proposal should be defined as a contextually high building within its analysis area.

### **Planning Statement**

Specifically to tall buildings, the supporting planning statement shall appraise any development against the guidance objectives and principles set out in this SPD and also the development plan.

### **Vacancy Strategy**

Where proposals include a non-residential element on the ground floor of a scheme, a vacancy strategy should set out how the space will be let in the event that there is no immediate end user.

### **Daylight & Sunlight Assessment**

Should be submitted to support any proposal over more than four storeys in height where adjoining other development land or public open spaces.

### **Protected Views Assessment**

Any development within the protected view corridors as set out in the adopted planning policy maps, must be accompanied by an assessment on how the proposed development would impact on the protected view(s). Assessments should accord with Policy DM3 of the Harrow Development Management Policies Local Plan (2013), or any superseding policy thereafter.

### **Fire Safety**

All development proposals must achieve the highest standards of fire safety. Developments must be supported by a fire safety assessment, and follow the guidance set out within Policy D10 (Fire safety) of the London Plan (2021).

4.2.1 Development where height is proposed, almost always requires planning permission. Furthermore where height is being proposed, such developments can potentially result in significant harm, and can cause concern to residents by their very nature.

4.2.2 Prior to submission of a planning application, and throughout the planning application statutory timeframe, there are a number of opportunities and avenues for applicants to work with the LPA to reach a successful outcome:

### Planning Performance Agreement (PPA)

Tall and contextually high buildings can be very divisive within the communities in which they are proposed to be located. Entering into a Planning Performance Agreement (PPA) allows an ongoing dialogue with the Local Planning Authority (LPA), seeking to achieve a successful outcome for a development. The level of dialogue will be on a case-by-case basis.

### Pre-Application Service

Not all instances will require an applicant to engage in a PPA. However, early discussion with the LPA through the pre-application service can assist in addressing any concerns with a development prior to formal submission of a planning application.

### Design Review Panel (DRP)

Where appropriate, a presentation to the Harrow Design Review Panel (DRP) can be hugely beneficial to a scheme. Feedback from the DRP can be addressed through a schemes design evolution, resulting in a more robust process and a higher quality design.

### Planning Policy Advisory Panel (PPAP)

In certain circumstances, especially with major schemes, presenting to the Planning Policy Advisory Panel (PPAP) can give applicants the opportunity to answer any questions that elected members may have in relation to their scheme.

### RAF Northolt

Much of Harrow (specifically central Harrow and to the west of the borough), is constrained by the RAF Northolt safeguarding zones, which seek to consider height of new development in relation to the safe operations of the airport and air traffic using it. Safeguarding zones can be viewed on the Harrow Planning Policy Maps.



