

# Planning Policy Advisory Panel Agenda

Date: Thursday 13 July 2023

Time: 6.30 pm

Venue: The Auditorium - Harrow Council Hub, Kenmore Avenue, Harrow, HA3 8LU

**Membership** (Quorum 3)

Chair:	Councillor Marilyn Ashton
<b>Conservative Councillors:</b>	Christopher Baxter Stephen Greek Zak Wagman
Labour Councillors:	Asif Hussain Nitin Parekh David Perry
Conservative Reserve Members:	<ol> <li>Norman Stevenson</li> <li>Anjana Patel</li> <li>Paul Osborn</li> <li>Salim Chowdhury</li> </ol>
Labour Reserve Members:	<ol> <li>Graham Henson</li> <li>Varsha Parmar</li> <li>Krishna Suresh</li> </ol>

**Contact:** Mwim Chellah, Senior Democratic and Electoral Services Officer Tel: 07761 405966 E-mail: mwimanji.chellah@harrow.gov.uk

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# **Useful Information**

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You will be admitted on a first-come-first basis and directed to seats.

Please:

- (1) Stay seated.
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- (4) Follow instructions of the Security Officers.
- (5) Advise Security on your arrival if you are a registered speaker.

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#### Agenda publication date: Wednesday 5 July 2023

# Agenda - Part I

#### 1. Appointment of Vice-Chair

To consider the appointment of a Vice-Chair to the Planning Policy Advisory Panel for the 2023-2024 Municipal Year.

#### 2. Attendance by Reserve Members

To note the attendance at this meeting of any duly appointed Reserve Members.

#### 3. **Declarations of Interest**

To receive declarations of disclosable pecuniary or non pecuniary interests, arising from business to be transacted at this meeting, from all Members present.

#### 4. **Minutes** (Pages 5 - 8)

That the minutes of the meeting held on 4 May 2023 be taken as read and signed as a correct record.

#### 5. Public Questions

To note any public questions received.

Questions will be asked in the order in which they were received. There will be a time limit of 15 minutes for the asking and answering of public questions.

[The deadline for receipt of public questions if 3.00 pm, 10 July 2023. Questions should be sent to <u>publicquestions@harrow.gov.uk</u>

#### No person may submit more than one question].

#### 6. **Petitions**

To receive petitions (if any) submitted by members of the public/Councillors.

#### 7. **Deputations**

To receive deputations (if any).

- 8. Local Areas of Special Character Report (Pages 9 26)
- Tall Buildings (Building Heights) Supplementary Planning Document (Pages 27 -192)
- 10. Statement of Community Involvement Report (Pages 193 236)
- 11. **Any Other Urgent Business** Which cannot otherwise be dealt with.

# Agenda - Part II - NIL

#### **Data Protection Act Notice**

The Council will record the meeting and will place the recording on the Council's website.

[Note: The questions and answers will not be reproduced in the minutes.]



# Planning Policy Advisory Panel

# Minutes

# 4 May 2023

#### Present:

Chair: Councillor Marilyn Ashton

- Councillors:Christopher BaxterDavid PerryStephen GreekNorman StevensonNitin Parekh
- Absent: Councillor Asif Hussain

#### 35. Attendance by Reserve Members

**RESOLVED:** To note the attendance at this meeting of the following duly appointed Reserve Members:-

Ordinary Member

Reserve Member

Councillor Zak Wagman

Councillor Norman Stevenson

#### 36. Declarations of Interest

**RESOLVED:** To note that there were none.

#### 37. Minutes

**RESOLVED:** That the minutes of the meeting held on 6 March 2023, be taken as read and signed as a correct record.

#### 38. Public Questions, Petitions and Deputations

**RESOLVED:** To note that no public questions, petitions or deputations were received at this meeting.

### **Resolved Items**

#### 39. Proposed Harrow Town Centre Masterplan Supplementary Planning Document (SPD) - Scoping

The Panel received a report and presentation on a proposed Master Plan for Harrow Town Centre. It was proposed for adoption as a Supplementary Planning Document (SPD) in order that it would be a material consideration in determining planning applications.

The presentation included the significant changes to Harrow Town Centre in recent years, the changes to the local economy and the importance of maintaining the Metropolitan Town Centre status. It was noted that the SPD would provide specific clarification on the types of businesses, uses, and activities that would be encouraged within the defined boundary. The current proposal was to use the town centre boundary as it would be within an existing framework but this would be confirmed as preparation of the SPD progressed.

The Panel was informed that it would provide the potential to create positive proactive change through redevelopment, for example TfL redevelopment of the underground station and bus station. It would make Harrow's vision clearer and show potential developers and people who want to invest and open businesses the increasing vitality of the town centre.

Members were invited to provide comments and discuss the proposed Master Plan.

A Member asked why it was important to retain Metropolitan Centre status, what the SPD would try to prevent, and for successful examples in other London Boroughs. The Panel noted that it brought status and prestige, investment and new business, and enabled it to compete with other town centres for investment by the Mayor of London. The Chief Planning Officer reported on his experience of successful implementation of such SPDs. It was not a site allocation process but could identify what was appropriate for each site. Furthermore, as a SPD alone it would not prevent wholly inappropriate development but would supplement existing policies for this.

A further Member stated that he had attended a meeting of the Harrow BID which was looking at the next five years. He sought further detail on the TfL development proposals. The officer reported that initial contact by TfL indicated high priority for the redevelopment of the underground station and bus station as the latter was at capacity. The SPD would give Harrow Council more of a proactive voice in the proposals.

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A Member observed that town centre footfall was good but was concerned that it was not seen as an evening destination. Furthermore, there were not clear logical through routes.

In response to questions, the Panel noted that:

- the evidence for the change in the way high streets were used was provided by the Office for National Statistics and was contained in paragraph 4.3 of the report;
- the SPD would promote the vision, define its purpose and its relationship to other centres and regeneration areas in the Borough. It would identify the key spaces and preferred uses;
- it was not a new policy but provided more up to date information and would carry statutory weight as a SPD. It would not conflict but augment other policies.

#### **RESOLVED:** That

- (1) the content of the report and accompanying presentation be noted;
- (2) the preparation of the draft Harrow Town Centre Master Plan Supplementary Planning Document be progressed.

#### 40. Proposed West Drive and Bellfield Avenue Conservation Area Designation - Outcomes of Consultation and Recommendations

The Panel received a report and presentation which detailed the outcomes of the recent consultation on the proposed West Drive and Bellfield Avenue Conservation Area in Harrow Weald which ran for a period of six weeks from 20 February 2023 to 3 April 2023. It was noted that the matter had been previously considered by the Panel at its meeting on 30 November 2023 and Cabinet had agreed to its recommendation that consultation should occur on the proposed area.

Members were informed of the responses received and that, as a result, two minor amendments were proposed to the boundary. These amendments removed 30 and 32 Bellfield Avenue from the proposed conservation area and included 128, 130 and 132 Uxbridge Road. The revised boundary therefore comprised 1-41 consecutive West Drive, 1-29, 31 and 33-47 consecutive Bellfield Avenue, all of West Drive Gardens and 128, 130 and 132 Uxbridge Road.

In response to a question, the Panel was informed that 30 and 32 Bellfield Avenue were of more modern architecture and it therefore made sense to omit these. Numbers 128, 130 and 132 Uxbrdige Road were 1930s mock tudor properties, with 128 being locally listed.

Historic England's response to the consultation was that there did not appear to be a clear case made for the special architectural and historic interest of the area to warrant designation. This was similar to the officer assessment

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considered by the Panel in November 2022, which noted the case was 'marginal'. The Chair advised the Panel that residents of the roads under discussion had been upset and had campaigned when the roads had been removed from a conservation area in 2015. The consultation had provided the opportunity for the residents to redress this if they so wished.

In response to questions, it was noted that:

- the proposed areas had previously been in a conservation area but had been excluded from the formation of a new one in the area. As there had been no further review of conservation areas there had not been the opportunity for their inclusion elsewhere;
- the top of West Drive was already in a conservation area and the properties in Lakeland Close were of modern architexture;
- numbers 30 and 32 Bellfield Avenue were quite modern and distinctive so it was practical to omit them from the conservation area;
- Historic England had not raised formal objections to the proposals.

It was moved and seconded that the proposed West Drive and Bellfield Avenue Conservation Area not be recommended to Cabinet. Upon being put to the vote the motion was lost. The proposed conservation area together with the revisions arising from the consultation responses was put to the vote and carried.

#### **RESOLVED:** That

- (1) the outcomes of the consultation undertaken on the proposed West Drive and Bellfield Avenue conservation area be noted;
- (2) the responses received as a result of the additional letters sent in response to comments received during the formal consultation period and which impacted upon the proposed boundary be noted;
- (3) the amended proposed conservation area boundary be noted;
- (4) the revised area be recommended to Cabinet for designation as the 'West Drive and Bellfield Avenue Conservation Area', subject to any further consultation responses received which would be formally reported to Cabinet.

(Note: The meeting, having commenced at 6.30 pm, closed at 7.50 pm).

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(Signed) Councillor Marilyn Ashton Chair



<b>Report for:</b>	Planning Policy
	Advisory Panel
Date of Meeting:	13 <sup>th</sup> July 2023
Subject:	Local Areas of Special Character – outcomes of consultation on the proposed designation criteria
Key Decision:	Yes – when considered by Cabinet
<b>Responsible Officer:</b>	Viv Evans, Chief Planning Officer
Portfolio Holder:	Councillor Marilyn Ashton, Deputy Leader of the Council, Planning & Regeneration Portfolio Holder
Exempt:	No
Decision subject to Call-in:	No
Wards affected:	All
Enclosures:	Appendix 1 – Responses to informal consultation

# **Section 1 – Summary and Recommendations**

The Planning Policy Advisory Panel considered draft criteria for the proposed Local Area of Special Character (LASC) designation at its meeting on 6 March 2023. This report feeds back representations received to informal consultation on the proposed criteria and recommends minor changes arising from these. It then recommends that the Panel commends the criteria to Cabinet for adoption..

#### **Recommendations:**

The Planning Policy Advisory Panel is requested to:

 (A) consider the consultation responses on the criteria for the new local heritage designation namely proposed 'Local Areas of Special Character'; and (B) recommend to Cabinet the criteria for designation (including the minor clarification), as set out in paragraph 6.3 of the report.

# Reason:

Harrow benefits from an exceptionally diverse historic environment. It includes conservation areas designated under the Planning (Listed Buildings) and Conservation Areas) Act 1990 as 'areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance'. The National Planning Policy Framework [NPPF] cautions that 'the concept of conservation not [be] devalued through the designation of areas that lack special interest'. At the same time the NPPF and Historic England's national guidance recognise the importance and necessity of identifying and maintaining up to date records of the significance of local heritage assets. There are many local areas in Harrow that might not meet the strict criteria for conservation area status but do have local heritage interest. Accordingly, this report proposes the designation criteria for the new local designation for such Local Areas of Special Character. This proposed local designation, and its associated local criteria for designation, is a parallel to the existing local designations of locally listed buildings and locally listed parks and gardens in Harrow for those buildings and areas that do not meet the strict criteria for national heritage designation. The local consultation undertaken was in accordance with national best practice.

# **Section 2 – Report**

# 1.0 Introduction

- 1.1 The report incorporates the corporate priority concerning:
  - Putting Residents First

It also reflects the overarching objective of Restoring Pride in Harrow.

1.2 Should the new suggested criteria for the designation of Local Areas of Special Character be confirmed, the ability to designate Local Areas of Special Character will provide improved protection to help maintain the unique historical local character of areas or neighbourhoods within Harrow which residents cherish and value.

# 2.0 Options considered

- 2.1 The option of not introducing these new criteria for designation, nor subjecting the proposed criteria for designation to local consultation, was considered but this would be contrary to the obligations placed on the Council under the NPPF which states in paragraph 192 that 'Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to: a) assess the significance of heritage assets and the contribution they make to their environment'. It would also be at odds with the approach Harrow takes to buildings and landscapes of local interest but not worthy of national interest via national versus local listing.
- 2.2 The option of not consulting on the proposed criteria was dismissed as such a process is considered beneficial with respect to testing the technical merits of the proposed criteria and their clarity.

## 3.0 Background

#### What is a Proposed Local Area of Special Character?

3.1 The Panel at their meeting on 6<sup>th</sup> March 2023, agreed to the principle of a new local heritage designation of: Local Areas of Special Character, to be seen as a lower level of heritage interest to those of statutory Conservation Area status. The new heritage designation is designed for areas with a level of local interest / significance that would benefit from formal recognition to help assessment of planning applications. The implications would be that it would be a material consideration for any planning applications in terms of whether what is special about the heritage interest of that area is preserved by the proposal, either via a direct impact on it or via impact on its setting. Relevant heritage policies relating to non-designated heritage assets in the NPPF and Local Plan would apply i.e. the Core Strategy policy CS1: Overarching Policy and Development Management policy DM7: Heritage Assets. NPPF paragraph 203 would apply which states:

'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.

#### Suggested criteria for designation

3.2 The panel at their meeting on 6<sup>th</sup> March 2023, agreed to informal consultation regarding criteria for designation. It was agreed that the criteria must connect back to national heritage policy and guidance on the heritage significance of heritage assets. For example, Harrow's criteria for conservation area status, but also relate back to national heritage legislation, namely the Planning

(Listed Buildings and Conservation Areas) Act 1990's definition of conservation areas as 'areas of special character and appearance' that it is 'desirable to preserve or enhance' and wider national and local policy and guidance relating to heritage significance including the NPPF. Similarly, the Historic England guidance document entitled Local Heritage Listing Historic England Advice Note 7 which provides a list of various criteria likely to indicate the nature of heritage significance/interest including: age, rarity, aesthetic interest, group value, historic association, and social and communal value.

- 3.3 The suggested criteria for designation for Local Area of Special Heritage Character subject to consultation was therefore as follows:
  - 1. The area must be of heritage significance.
    - One or more of the following criteria need to be met:
      - a. Townscape of locally cohesive, well-preserved quality.
      - b. Architecture of locally cohesive, well-preserved quality.
      - c. Landscape of locally distinctive and well-preserved quality.

Overall, an area must have discernibly higher quality and degree of intactness than other parts of the borough (other than designated conservation areas, that have special architectural or historic interest), thereby demonstrating distinctiveness.

## 4.0 **Process and timeframes for consultation undertaken**

- 4.1 There are no statutory requirements to consult on the criteria for LASC, however as best practice and the Historic England recommendation, Harrow consulted with local and national conservation groups namely:
  - the Harrow's Conservation Area Advisory Committee.
  - Society for the Protection of Ancient Buildings
  - Victorian Society

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- Georgian Group
- Twentieth Century Society
- Gardens Trust
- Council for British Archaeology
- 4.2 These groups were emailed on 21st April 2023, provided with an explanation of the background (including link to PPAP report) and requirements of the consultation, and provided with a month to respond with any representations.

#### 5.0 **Responses to consultation request**

- 5.1 These are listed in full in appendix 1.
- 5.2 In summary, seven responses were received. Support for the new local heritage designation was overwhelmingly expressed (five respondees) including the Historic England, Victorian Society, and the Conservation Area

Advisory Committee. The remaining two respondees did not comment on the merits of a local designation.

- 5.3 Just three responses specifically commented on the proposed criteria for designation. Historic England noted the methodology and justification for the proposal [which includes the criteria] is set out clearly in the 23 March 2023 report to the Planning Policy Advisory Panel and follows Historic England published guidance on 'The Designation of Local Heritage Listing' (Heritage Advice Note No.7). As such 'we consider the proposal to be in conformity with the NPPF requirement to conserve heritage assets in a manner appropriate to their significance and to plan positively for the management of the historic environment.' The Victorian Society noted 'we would make no comments on the proposed criteria which seems wide ranging enough to encompass various areas'. The Conservation Area Advisory Committee noted that the proposed criterion regarding 'identification of areas of heritage significance' seems difficult. Clarification on what this would mean was requested. Therefore, it is now recommended that this criterion be amended to define heritage significance as outlined in section 6.
- 5.4 Otherwise, six areas to be considered for LASC designation were recommended by two respondents, namely:
  - 1) West Harrow Village
  - 2) West End Avenue (the oldest par) mostly built by World War I.
  - 3) Meadow Road, Pinner classic Metroland
  - 4) The Royston Park Estate including the later developments of Rowlands Avenue, Furham Field and Sherington Avenue - low density parts of Hatch End, plentiful historic trees, interlinking footpaths following original field lines.
  - 5) St Anselms Road, Wellington Road, Woodridings Avenue, Hillview Road for the same reason as point 4.
  - 6) Grimsdyle ditch from Oxhey Lane through to Woodridings Close (Footpath 129) for the same reason as point 4.

These are noted and once the criteria for designation are agreed, these areas can be investigated further in due course.

5.5 The remaining ten comments/queries received, alongside council responses are provided in the table below:

	Consultation response	Council response
1)	Request to be updated on the designation as it is implemented and how this will affect planning decisions.	Noted. This will be done.
2)	Will local residents be consulted as to whether they wish to be a part of a designated area.	Yes – as per local listing of buildings and introduction of conservation areas. The views of local residents would be sought via public consultation.
3)	Will conservation and enforcement	Currently there are no plans to increase
	personnel be increased accordingly (noted	the conservation resource. The

Consultation response	Council response
that enforcement have been non- responsive on some cases)?	enforcement team is separately proposed to be increased by two officers.
4) Will the Conservation Area Advisory Committee (CAAC) be asked for comments?	The views of CAAC on planning applications in Local Areas of Special Character will not be sought since their remit is Conservation Areas.
5) The Saunders Report available at <u>https://historicengland.org.uk/research/resul</u> <u>ts/reports/27-2021</u> (page 41) puts the proposal in context as other local authorities have done similar.	Noted that other Local Authorities have similarly introduced a local area designation.
<ol> <li>Agree that the hierarchical distinction between conservation areas and Local Areas of Special Character is important.</li> </ol>	Noted.
7) We already have an Area of Special Character in Harrow. There is a DM policy specially for it, namely DM6. It is mentioned in officer reports more recently. It covers almost all of Harrow on the Hill including 'islands' excluded from conservation areas.	The designation of 'Area of Special Character' differs to that which is the subject of this report. This report concerns the new heritage designation of 'Local Area of Special Character', which is a local heritage designation equivalent to a Conservation Area but at a lower level of significance ie local not national. The other designation is a strategic planning designation with related planning policy to support it ie Local Development Management policy DM6.
8) In order to preserve the special qualities of parts of Hatch End there is a need to maintain the relatively low-density, not convert houses to flats, manage scale of buildings (including via additional stories allowed via permitted development), preserve green front gardens, grass verges and street trees, rights of way and open spaces and parks.	As outlined fully in paragraph 3.1 above, the designation would be a material consideration for any planning applications in terms of whether what is special about the heritage interest of that area is preserved by the proposal, either via a direct impact on it or via impact on its setting. Relevant heritage policies relating to non-designated heritage assets would apply.
9) In order to provide a robust tool for planning decisions we would also recommend that the area-based assessments are subject to a clear summary report process which sets out the reasons for designation the significance of the area and the character of which it is desirable to preserve. These reports should be made publicly accessible on the Council's website and the Heritage Environment Record. Further detailed	This is noted and would be undertaken with any designations.

Consultation response	Council response
advice on producing and publishing the list is set out in our Heritage Advice Note No.7.	
10) It must be noted that this advice does not affect our [Historic England] obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this request and which may have adverse effects on the environment.	This is noted and accepted.

# 6.0 Clarification to criteria for designation following consultation

- 6.1 The overwhelming support for the principle of designation is noted, as well as the support that the Victorian Society expressed for the proposed criteria for designation. There were no objections to the proposed criteria for designation and they therefore remain the same.
- 6.2 However, since one respondent requested the first criterion requiring 'identification of areas of heritage significance' be clarified. Accordingly, significance in this criterion is now provided with the current definition provided in the glossary of terms in the National Planning Policy Framework (2021), or any subsequent replacement national planning policy or guidance. The current definition is: 'The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting'. In Harrow, for example, this may include certain more intact / locally cohesive areas of Metroland.
- 6.3 Therefore the criteria for designation of Local Areas of Special Character are now recommended to be as follows:
  - 1) The area must be of heritage significance (as defined in the National Planning Policy Framework (2021) or any subsequent replacement).
  - 2) One or more of the following criteria need to be met:
    - a. Townscape of locally cohesive, well-preserved quality.
    - b. Architecture of locally cohesive, well-preserved quality.
    - c. Landscape of locally distinctive and well-preserved quality.

Overall, an area must have discernibly higher quality and degree of intactness than other parts of the borough (other than designated conservation areas, that have special architectural or historic interest), thereby demonstrating distinctiveness.

## 7.0 Next Steps

7.1 The proposed criteria and any comments from the Panel on these will be presented to Cabinet for formal adoption. The criteria will then form the basis

of the consideration of any areas for potential designation, The New Local Plan will include reference to Local Areas of Special Character within the any heritage policies. In the meantime, formal identification of LASCs will assist in the application of Policy DM7: Heritage Assets to any proposals within these areas. Policy DM7, despite not specifically referring LASCs, is sufficiently broad to be a relevant policy 'hook' as it refers to 'heritage assets' (which LASCs will be a new category) and the level of significance of the assets (which as noted above, will be less than that of statutory Conservation Areas.

- 7.2 In terms of future identification of LASCs, at the 30<sup>th</sup> November 2022 Planning Policy Advisory Panel meeting, two areas: Butler Avenue (West Harrow) and Suffolk Road (North Harrow) were concluded to not meet the Harrow criteria for conservation area designation. It was noted though that for Butler Avenue, the West Harrow Community Forum should be contacted and if, as a result of this, there was a stronger case for designation, Officers should advise the Panel of this. Also, for Butler Avenue it was noted that a wider area could be considered for any future Local Area of Special Character (LASC) assessment. Accordingly, once the criteria for designation are confirmed, the Local Planning Authority will contact the West Harrow Community Forum to identify whether there is further information that indicates the area is worthy of conservation area status and otherwise review this area for possible Local Area of Special Character status.
- 7.3 It is noted that this consultation process has resulted in a number of further suggestions for possible Local Areas of Special Character as outlined in paragraph 5.4 above. In the context of limited resources, the Local Planning Authority cannot commit to a programme for reviewing these areas at this time. However, the suggestions are welcomed and noted. They will be kept on file, along with any future recommendations, with a view towards assessing them in future with the findings and recommendations brought forward to the panel.

## 8.0 Performance Issues

8.1 The new designation will assist in protection of Harrow's local heritage.

## 9.0 **Procurement Implications**

9.1 There are no procurement implications in the new local heritage designation.

## **10.0 Environmental Implications**

10.1 The designation would not have a direct environmental implication since it would be a heritage designation. But it may result in the preservation of landscape of locally distinctive and well-preserved quality which may have a positive environmental implication.

Ward Councillors' comments – Not applicable as impacts all wards

# **Risk Management Implications**

Risk included on Directorate risk register? No

Separate risk register in place? No

Risks included on corporate or directorate risk register? No

Separate risk register in place? No

The relevant risks contained in the register are attached/summarised below. n/a

The following key risks sho	uld be taken into account when agreeing	g the
recommendations in this re	port:	

Risk Description	Mitigations	RAG Status
Consultation not undertaken in accordance with statutory requirements	<ul> <li>There are no statutory consultation requirements.</li> <li>Appropriate requirements were reviewed (i.e. Harrow's Statement of Community Involvement) and followed where relevant.</li> <li>Any 'minimum' standards were exceeded (i.e. emails to 6 national amenity societies and to the Conservation Area Advisory Committee).</li> </ul>	GREEN
The agreement of the criteria for Local Areas of Special Character is later challenged	<ul> <li>The criteria connect back to national heritage policy and guidance on the heritage significance of heritage assets including the NPPF and Historic England the guidance document entitled Local Heritage Listing Historic England Advice Note 7 which provides a list of various criteria likely to indicate the nature of heritage significance/interest.</li> <li>Consultation was undertaken and responses informed the final criteria.</li> </ul>	GREEN
The submission of numerous proposals for Areas of Special Character with insufficient conservation resources to assess them	<ul> <li>Whilst a programme for assessment cannot be committed to at this stage the matter will be kept under review, and areas assessed where possible.</li> <li>Awareness by the Local Planning Authority (LPA) of potential areas for consideration for LASCs is helpful. Should a planning application be received that would effect an area considered to be of heritage</li> </ul>	GREEN

Risk Description	Mitigations	RAG Status
	significance by the LPA but has no formal heritage designation, it may still be assessed in the context of	
	NPPF paragraph 203 which states: 'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the	
	application' and requires 'a balanced judgementhaving regard to the scale of any harm or loss and the significance of the heritage asset'.	

# **Legal Implications**

The Council has a statutory duty and is required under section 69(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to carry out reviews 'from time to time' to determine whether any parts or further parts of their area should be designated as conservation areas; and if it so determines, that part(s) shall be so designated. It follows that those not worthy, but still of heritage value, are recognised in accordance with the NPPF paragraph 192's requirement that: 'Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to: a) assess the significance of heritage assets and the contribution they make to their environment'.

# **Financial Implications**

The costs of developing the draft criteria and undertaking the informal consultation have been met from within the existing revenue budgets of the Council's Planning Policy team. If any further action is required (such as undertaking the process to designate a Local Area of Special Character), any costs will also be met from existing revenue budgets.

# Equalities implications / Public Sector Equality Duty

Was an Equality Impact Assessment carried out? No

EqIA is not considered necessary in respect of the designation of a Local Area of Special Character. Such a proposal is based on the architectural and historic merit of an area. Furthermore, the higher order Local Plan policy that contains the criteria against which development within Local Areas of Special Character is assessed was subject to an equalities impact assessment prior to its adoption.

# **Council Priorities**

The decision sought will help the Council meet the priority of improving the environment by helping ensure the attractiveness of the borough as a place to live and demonstrating that the Council seeks and listens to the views of its residents (by Putting Residents First).

# **Section 3 - Statutory Officer Clearance**

Statutory Officer: Jessie Man Signed on behalf of the Chief Financial Officer

Date: 27/06/2023

**Statutory Officer: Jimmy Walsh** Signed on behalf of the Monitoring Officer

Date: 27/06/2023

**Corporate Director: Dipti Patel** Signed by Corporate Director

Date: 28 June 2023

Chief Officer: Signed off by the Chief Planning Officer

Evano.

Date: 29 June 2023

## Head of Procurement: Nimesh Mehta

Signed on behalf of the Head of Procurement

Date: 27/06/2023

## Head of Internal Audit: Neale Burns

Signed by the Head of Internal Audit

Date: 27/06/2023

# **Mandatory Checks**

# Ward Councillors notified: NO – impacts all wards

**EqIA carried out:** NO - see above If 'NO' state why an EqIA is not required for Cabinet to take a decision

EqIA cleared by: N/A

# **Section 4 - Contact Details and Background Papers**

**Contact:** Lucy Haile, Principal Conservation Officer, lucy.haile@harrow.gov.uk

## **Background Papers:**

Historic England: 'Local Heritage Listing Historic England Advice Note 7' (2<sup>nd</sup> edition) - https://historicengland.org.uk/imagesbooks/publications/local-heritage-listing-advice-note-7/

Harrow Conservation Areas and Supplementary Planning Documents (SPDs) - <u>https://www.harrow.gov.uk/planning-developments/biodiversity-conservation</u>

Report to Planning Policy Advisory Panel – 3<sup>rd</sup> March 2023 - <u>Agenda for</u> <u>Planning Policy Advisory Panel on Monday 6 March 2023, 6.30 pm –</u> <u>Harrow Council</u>

	Date of	Name of	ormal consultation
	response	respondent	Response
1)	22/04/2023	Trevor Gray	This proposal sounds worthy of support and I will raise it with The Stanmore Society committee. I am sure we have a number of areas in Stanmore we would wish to put forward for such a designation. Hopefully, we will be able to get comments to you in support ahead of 19 May.
2)	26/04/2023	Victorian Society	Thank you for making the Victorian Society aware of Harrow Borough Council's intention to designate 'Areas of Special Character'. This is a salutary way of extending the principle of local listing and it is encouraging sign of the value placed on heritage by your department. We would make no comments on the proposed criteria which seems wide ranging enough to encompass various areas. However, we would appreciate to be updated as the designation is implemented and how this will affect planning decisions.
3)	27/04/2023	Alan Flint	<ul> <li>I have read the proposal of adding Areas of Special Character to the Planning portfolio. I have just completed 20 years as a member of the CAAC, representing the Pinnerwood Park Area. Whilst I believe this to be a laudable addition I do foresee a few problems, and these are a few thoughts you may wish to consider.</li> <li>1. Will the residents of the areas/roads/properties be consulted and have a vote as to whether they wish to be part of this? The Council did organize a meeting for Pinnerwood Park in 1989, and having heard all the pros and cons from the Planning Officers the residents voted in favour.</li> <li>2. Will this new scheme come under the office of the Conservation Officer? If so there are 29 Conservation Areas in Harrow so I believe this additional workload would mean extra personnel being required in that department.</li> <li>3. There will no doubt be demands made on the Enforcement Department. I and others have found it very difficult to get responses from this department. For example, on the 11<sup>th</sup> November last year I drew attention to all new windows on the front elevation of a property in this area which were incorrect. I received an Enforcement number. On 21<sup>st</sup> March this year, as nothing appeared to be happening and I</li> </ul>

### Appendix 1 – Responses to informal consultation

Date of response	Name of respondent	Response
		<ul> <li>had had no response, I requested and update. Still no response, so on 21<sup>st</sup> April I sent another request for a response. I still have not had a reply. This appears to another department in need of extra personnel even without this extra responsibility.</li> <li>4. Will this in any way involve the CAAC for comments?</li> </ul>
		I would appreciate these points being taken into consideration when any decision is made.
4) 2/05/2023	Historic England	Thank you for consulting Historic England on the London Borough of Harrow's proposal to designate "areas of special character.
		Accordingly, we have reviewed the consultation documents in light of the <i>National Planning Policy Framework</i> (NPPF, 2019) which requires, as one of its core objectives, that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.
		The proposal will, in effect, formally identify areas of local heritage character as "non-heritage assets" and therefore align these to the relevant considerations set out in NPPF (specifically policy 203). The methodology and justification for the proposal is set out clearly in the accompanying <i>Report to the Planning Policy Advisory Panel</i> , dated 23 March 2023. We are pleased to note that the report has been prepared with reference to our published guidance on <i>The Designation of Local Heritage Listing</i> (Heritage Advice Note No.7) and in our view the proposal will provide a positive tool for the managing of local heritage assets. As such we consider the proposal to be in conformity with the NPPF requirement to conserve heritage assets in a manner appropriate to their significance and to plan positively for the management of the historic environment.
		In order to provide a robust tool for planning decisions we would also recommend that the area-based assessments are subject to a clear summary report process which sets out the reasons for designation the significance of the area and the character of which it is desirable to preserve. These reports should be made publicly accessible on the Council's website and the Heritage Environment Record. Further detailed advice

Date of response	Name of respondent	Response
		on producing and publishing the list is set out in our Heritage Advice Note No.7.
		We hope you find the above observations helpful. If you wish to discuss the above comments. please do not hesitate to contact me.
		It must be noted that this advice does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this request and which may have adverse effects on the environment.
5) 16/05/2023	John Cobb Planning representativ e on behalf of the Hatch End Association	The email appended below was forwarded by the Hatch End Association representatives on the Conservation Area within Hatch End and Pinner. I am writing to provide comments specific to Hatch End as a "village" within Harrow. Hatch End became a suburban area in the 1870's onwards (Victorian/Edwardian) well before most of Metropolitan Harrow as developed after the first world war. Hatch End already has a conservation area and listed buildings (such as Hatch End Station, Letchford House and the Harrow Arts Centre). However, areas of Hatch End are often used to portray the best of green suburbia within Harrow and although built up over many years retains its charm and representative of high-quality suburban life. Given they comprise mixed residential housing from the Victorian era to the present day the have never qualified as conservation areas. However, they do represent the special character of Hatch End. The points below represent feedback from the Committee of the Hatch End Association. They apply to the whole of Hatch End (apart from the existing conservation areas). However, areas of particular note are those originating in Edwardian times as original streets were developed. Examples are: • The Royston Park Estate including the later developments of Rowlands Avenue, Furham Field and Sherington Avenue. • St Anselms Road, Wellington Road, Woodridings Avenue, Hillview Road. • Grimsdyle ditch from Oxhey Lane through to Woodridings Close (Footpath 129) •

Date of response	Name of respondent	Response
		<ul> <li>trees (large oaks) remain plus parkland trees such as Sequoias and other specimen trees.</li> <li>We would request that you consider the following key points for Hatch End as a whole community: <ol> <li>The maintenance of relatively low-density housing with good spacing between buildings. This would restrict new extensions being built boundary to boundary converting detached houses into what becomes terraced roads with only a few centimetres between them.</li> <li>A predisposition against houses being converted into flats in residential roads.</li> <li>Management of the scale of the existing buildings and careful assessment and qualification of applications for additional storeys under permitted development that would not match the existing street scene.</li> </ol> </li> <li>Adherence to new housing or extensions that reasonably match the existing styles and materials (particularly gables and roof tiles) within the roads.</li> <li>Preservation of off-street parking but balanced by giving an emphasis on "green" front gardens rather than fully paved front drives, plus pedestrian friendly front boundaries and access arrangements.</li> <li>Preservation and maintenance of the existing Avenues of mature trees and the green verges.</li> <li>Preservation and maintenance of rights of way and particularly the footpaths within Hatch End.</li> <li>Preservation and maintenance of the existing open spaces and parks within Hatch End.</li> <li>I would be most grateful if you could take these points forwards as part of your 'Areas of Special Character' policy for Hatch End.</li> </ul>
6) 16/05/2023	Matthew Saunders	<ul> <li>The email below has reached me via the Joint Committee casework hub.</li> <li>I am replying in a personal capacity as author of The Saunders Report now available online at</li> <li><u>https://historicengland.org.uk/research/results/reports/</u>27-2021</li> <li>As my principal object there was the study of listing, I only deal with Conservation Areas peripherally but you may find the brief mention (page 41 ) puts your proposal in context.</li> </ul>

Date of response	Name of respondent	Response
		I didn't mean to be dismissive of other forms of area protection by the phrase "Conservation Area Lite" but I was very struck by the number of subsets that I found. I only mentioned 3 ("Heritage Area", "Area of Traditional Character" and "Identity Areas" ) but could easily have quadrupled that list with a multiplicity of headings. I welcome the clear differentiation in your excellent paper between the proposed new category and the Conservation Area, the latter being recognised as the stronger means of exercising control ( particularly with an Article 4 ). I do think that that hierarchy is vital.
7) 22/05/2023	Conservation Area Advisory Committee	<ul> <li>Christine Wallace commented on the consultation regarding Local Areas of Special Character:</li> <li>Noted that the proposed criterion regarding 'identification of areas of heritage significance' seems difficult. What would this mean?</li> <li>John Orchard: What area would be an area of special character in Harrow? They are all designated as conservation areas.</li> <li>John Orchard: West Harrow Village perhaps? This area was turned down for designation as a conservation area.</li> <li>Pat Clarke: Pat Clarke The oldest part of West End Avenue is very cohesive and mostly built by World War I. They have interesting porches window-heads etc. Some porches have gone, many windows have been changed, many original front walls have come down.</li> <li>Meadow Road, Pinner too perhaps.</li> <li>Both are areas of classic Metroland and you know the architect ie Henderson</li> <li>Is Cuckoo Hill Road by the same architect?</li> <li>Paul Catherall via email: We already have an Area of Special Character in Harrow. Historically it was very often not mentioned in officer's reports and also not mentioned in planning permission refusals which was frustrating as there is a DM policy specially for it, namely DM6. We always seek</li> </ul>

Date of response	Name of respondent	Response
		<ul> <li>to mention it in our HHT letters and matters have improved with it now being mentioned in officer reports in recent years. It basically covers the conservation areas, but it covers almost all of the Hill including the 'islands' excluded from conservation areas. Hence it is useful to try to stop those non-conservation areas from becoming even worse.</li> <li>Overall CAAC noted the LASCs would be a useful designation.</li> </ul>



<b>Report for:</b>	<b>Planning Policy</b>
	Advisory Panel

Date of Meeting:	13 <sup>th</sup> July 2023
Subject:	TallBuildings('BuildingHeights')SupplementaryPlanningDocument (SPD) –forconsiderationofconsultationresponsesandproposedamendments,andrecommendationtoCabinet toadopt
Key Decision:	No – advisory panel only
<b>Responsible Officer:</b>	Dipti Patel, Corporate Director Place
-	Viv Evans, Chief Planning Officer
Portfolio Holder:	Cllr Marilyn Ashton Deputy Leader of the Council, Portfolio Holder for Planning & Regeneration
Exempt:	No
Decision subject to Call-in:	No
Wards affected:	All Wards
Enclosures:	Appendix 1 – Consultation Statement: Schedule of Representations and Responses summary and officer response Appendix 2 – Revised Tall Buildings
	('Building Heights') SPD

# **Section 1 – Summary and Recommendations**

This report provides a progress update to the drafting of a draft Tall Buildings ('Building Heights') Supplementary Planning Document ("SPD"). The report specifically sets out the public consultation undertaken, the consultation responses received and comments on these, and the proposed changes to the draft the SPD following consultation.

The Panel is invited to make comments on consultation responses and proposed amendments to the draft SPD, which is attached as Appendix 2.

## **Recommendations:**

The Panel is requested to:

- A. Note the contents of this report, and the consultation feedback with responses (Appendix 1)
- B. Note the amended draft SPD which is considered to address the consultation responses where appropriate (Appendix 2)
- C. Provide comments / feedback in relation to the information set out in this report and associated draft SPD (Appendix 2) (to inform any revisions prior to the draft being submitted to Cabinet for consideration and agreement to adopt) and commend the draft SPD as a final document to Cabinet for adoption.

# Reason: (for recommendation)

To note the consultation responses and the amendments proposed to the draft SPD to address these, and to provide the Panel the opportunity for comment prior to the document being considered by Cabinet for adoption.

# **Section 2 – Report**

## 1.0 Introduction

- 1.1 The Council has committed to prepare a Tall Buildings Supplementary Planning Document (SPD)<sup>1</sup>, which responds directly to meeting a stated priority of the Council to provide guidance on tall buildings in suburbia to maintain the character of the area while allowing for growth.
- 1.2 This report provides an update to the Planning Policy Advisory Panel (PPAP) in relation to the progress of the development of the SPD. It follows on from previous PPAP meetings on 30 October 2022 and 9 January 2023 which assisted in the drafting of the SPD, and outlined the proposed consultation on the draft document.
- 1.3 This report provides an update to the public consultation that has been undertaken, the responses that were received during the consultation period, officer response to these representations with suggested amendments to the draft SPD. Appendix 1 provides a comprehensive table of consultation responses from public and stakeholders, including from but not limited to the online engagement platform and online consultation events.
- 1.4 A revised SPD incorporating the changes considered to be appropriate and resulting in an improvement to the SPD is attached as Appendix 2.

<sup>&</sup>lt;sup>1</sup> See Cabinet meeting 24 May 2022, item 5

<sup>(</sup>https://moderngov.harrow.gov.uk/documents/s176909/Cabinet%20Report%20-%20May%202022%20-%20Tall%20Buildings%20and%20Conversions%20-%20FINAL%20V2%20-%20220517.pdf)

- 1.5 The SPD does not (cannot) introduce new policy, rather it provides guidance to adopted policy(ies) within the Harrow Local Plan. Specifically, the draft Tall Buildings ('Building Heights') SPD would provide further guidance to Policy DM1 (Achieving a High Standard of Development) of the Harrow Development Management Policies Local Plan (2013). This policy in particular provides the basis on which this SPD may be brought forward, and therefore, the SPD will assist in giving effect to, and delivering against this policy across the borough (excluding the Opportunity Area). The SPD is unable to identify specific locations considered appropriate for tall buildings, or to set maximum heights (in terms of storeys / meters) for any buildings. This approach would fall outside of the remit of a SPD, but such matters will be dealt with through the local plan review (to be in general conformity with the requirements of (in particular) Policy D9 of the London Plan (2021)).
- 1.6 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 more significant change (as opposed to suburban areas for example, where change is incremental and character evolves over an extended period of time). It is recognised that the Harrow & Wealdstone Opportunity Area represents where growth has been strategically directed to over the current local plan period, and as such has already undergone significant change including many taller building developments. This SPD will only apply 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.
- 1.7 Once the SPD has been formally adopted (by Harrow Cabinet) it will become a material consideration in the determination of relevant planning applications.

## 2.0 Preparation of the Tall Building ('Building Heights') Supplementary Planning Document

2.1 In preparing the draft SPD, officers engaged informally with key external and internal stakeholders, to ensure that any key points would be able to be addressed at an early stage. The preparation of the draft SPD, including informal consultation undertaken was set out in the report to the Planning Policy Advisory Panel on the 9<sup>th</sup> January 2023 and also set out within the report to Cabinet for authority to consult on the draft SPD (16<sup>th</sup> February 2023). Based on the formal consultation, the SPD was drafted and enabled formal consultation to be undertaken.

# **3.0 Formal Consultation**

3.1 In undertaking formal consultation on the draft SPD, this followed the statutory process for the preparation and adoption of SPDs, including consultation in accordance with the Harrow Statement of Community Involvement (SCI). All consultation material was reviewed by the Harrow Communication Team. The following consultation approach was set out in the report to the Planning Policy

Advisory Panel in January 2023 and to Cabinet<sup>2</sup> on 16<sup>th</sup> February 2023, when authority to consult in accordance with the below consultation methods was approved.

- a. SPD published on Harrow online engagement portal, including a consultation questionnaire.
- b. Harrow Council website Local Plan page
- c. Harrow Press notice
- d. Harrow Council social media
- e. Email to be sent to MyHarrow accounts
- f. Emails / letters sent to consultees on the Local Plan database, who have indicated they are interested in Planning Policy consultations;
- g. Two online engagement sessions (held on Zoom)
- 3.2 Following the authority to consult from Cabinet, the following information was provided on the Council's new online engagement platform (EngagementHQ);
  - Draft SPD
  - Background evidence (Characterisation & Tall Buildings Study (2021))
  - Key dates for consultation period opening & closing
  - Public events held (x2) including dates / times and joining details
  - Frequently asked questions page (nine questions)
  - Online survey with level of agreement / disagreement polls and free / open text option.
  - Questions tab to ask the planning policy team a question directly.
  - Alternative methods of contacting the planning policy team (email/post)
- 3.3 A copy of the draft SPD was also available on the Harrow Council website, with alternative options to provide comment.
- 3.4 The consultation period was open for seven weeks and commenced on Monday 27<sup>th</sup> February 2023 and ran until midnight Monday 17<sup>th</sup> April 2023. The consultation period was extended to seven weeks (from the usual six weeks) to account for the Easter Holiday period. The outcomes of the consultation, and any resulting amendments to the SPD, are set out below and within the full consultation feedback as Appendix 1 (including online event summary) and the amended SPD attached as Appendix 2. In accordance with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council must publish a consultation statement explaining how any issues raised in representations have been addressed in the SPD. This is attached as Appendix 1.

<sup>2</sup> See Cabinet meeting 16 February 2023, Item 9

https://moderngov.harrow.gov.uk/documents/g65431/Public%20reports%20pack%20Thursday%2016-Feb-2023%2018.30%20Cabinet.pdf?T=10

- 3.5 The EngagementHQ platform was promoted as being the primary point of contact for engaging with the Council in relation to the SPD, associated information and providing any feedback on the draft SPD. Over the consultation period the following data was able to be collected in terms of traffic on the website;
  - Total Visits to the site; 1.9K
  - Engaged Visitors: 151
  - Informed Visitors 786
- 3.6 As a result of the consultation arrangements available on the EngagementHQ platform, there were a total of **151** completed online surveys. This consisted of responses from residents, voluntary organisation and other respondents.
- 3.7 Aside from responses submitted though the EngagementHQ platform, 27 emails responses were also received. The content and responses to these are attached in Appendix 1.
- 3.8 As part of the consultation engagement, two online events were advertised (on EngagementHQ and through other platforms as set out above, such as Twitter) and held via Zoom on Wednesday 8<sup>th</sup> March 2023 and Tuesday 21<sup>st</sup> March 2023. Both events were held between 6.00pm and 7.30pm. Over the two events, officers provided a presentation of the draft SPD and following this were available for a question-and-answer session. Over the two events, a total of **15** people attended.
- 3.9 In the lead up to each of the public online consultation events, each of the events were publicised further on all Harrow Council social media platforms. This included direct email reminders to all persons who had up until that time registered on the EngagementHQ platform in relation to this consultation.
- 3.10 Whilst it is acknowledged that the attendance of the online consultation events was relatively low, officers are confident that significantly more people were informed of the events (as confirmed by the data collected through EngagementHQ) and therefore had the opportunity to attend. Furthermore, when taken collectively with the amount of visitors to the EngagementHQ platform who were 'informed' (visiting pages on the website) and then those who were 'engaged' (by completing the survey), it is clear that a sufficient quantum of people were aware of the online events. When taken across the entire consultation event, officers are satisfied that a sufficient number of people were aware of the draft SPD, and were aware of the online events that were being held. Furthermore, officers are satisfied that a satisfactory response was received in relation to the draft SPD, when taken across all of the consultation avenues. Consideration will however be given to how engagement and attendance levels can be increased in future consultations.

# 4.0 Draft Tall Buildings ('Building Heights') Supplementary Planning Document: Public Consultation Outcomes

4.1 The substantive points raised in the responses are detailed, alongside the Councils' responses, in the Schedule of Representations and Responses at Appendix 1 to this report. The main issues raised and proposed responses are summarised below. These are separated into Statutory consultees and then wider stakeholders / members of the public.

#### **Statutory Consultee Responses**

#### Greater London Authority / Mayor of London

- 4.2 All Local Development Documents in London must be in general conformity with the London Plan under section 24(1)(b) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004). Whilst a SPD is not a Development Plan Document (DPD), it's a Local Development Document as, as such, the Mayor of London may give an opinion to its general conformity with the London Plan. The Mayor is supportive of further design guidance such as the draft SPD in terms of its intent. However, three elements of concern with the draft SPD have been raised as conflicting with the London Plan (2021). GLA officers have delegated authority from the Mayor of London to provide comment in relation the draft SPD.
- 4.3 The GLA raised concern that the draft SPD does not, when referring to a London Plan (2021) tall building, fully reflect the definition set out within Policy D9 (Tall buildings) of that plan. This could lead to ambiguity or confusion for users as to what the overall height of a tall building could be.
- 4.4 <u>Officer Response</u>: Officers agree that the definition for a tall building as set out in Policy D9A (Tall buildings) of the London Plan (2021) should be set out verbatim to avoid any confusion. Any reference across the SPD to the London Plan definition follows this definition.
- 4.5 GLA officers are concerned with the term 'contextually tall', which is considered to create an alternative and competing local tall building definition below the minimum definition set out within the London Plan (2021). GLA officers are of the opinion that the competing local definition for a tall building therefore results in the draft SPD being in direct conflict with Policy D9 of the London Plan (2021). Any local definition of a tall building should not be less than that as defined within the London Plan (2021), and a definition should be set out within a Local Plan document that has been through an Examination in Public (where a SPD is not subject to such a process).
- 4.6 <u>Officer Response:</u> The GLA's concerns are noted, although these are arguably semantic. Consideration has been given to an alternative term that is able to be used to replace 'contextually tall' buildings, when referring to such proposals that are equal to or twice the height of the surrounding context, but less than that of the London Plan (2021) definition of a 'tall' building. It is considered that 'contextually high' is an appropriate alternative term which ensures that any

consideration of a scheme still requires a contextual analysis, specifically in relation to the impacts of height. The use of this term resolves the concern raised by the GLA in relation to any potential confusion between the London Plan (2021) definition of a tall building (by avoiding the word 'tall'), and the context-based approach used within the SPD.

- 4.7 GLA officers consider that the existing name of the document 'Tall Buildings ('Building Heights') SPD could result in a misleading and confusing message about the purpose and function of the document.
- 4.8 <u>Officer Response</u>: The SPD seeks to provide guidance to ensure that suburban Harrow is protected from inappropriately tall buildings (among other material considerations), and to ensure high quality of design.
- 4.9 The title of the SPD provides a clear indication that the guidance within it relates to tall buildings. The content within the SPD however is very clear that the guidance for what would be a contextually high building in a suburban location, is not in conflict with definition of a tall building as set out in Policy D9 (Tall buildings) of the London Plan (2021). Chapter 1 of the SPD makes it clear where and when the SPD should be engaged, and that the London Plan (2021) as the spatial strategy still provides the definition of a tall building. Chapters 1 and 2 are clear that a context based analysis for proposals in suburban Harrow is undertaken, with Chapter 3 providing design guidance for contextually high buildings and also tall buildings (as per the London Plan (2021) definition.

#### Transport for London (Spatial Planning)

- 4.10 TfL (Spatial Planning) have provided a response to the draft SPD to reflect TfL's statutory duties as the strategic transport authority. The response received from TfL (Spatial Planning) amount to a number of minor amendments suggested to more accurately reflect relevant policy and guidance. Such amendments were limited to Design Principles C1 (Sustainable Locations), D5 (Transport and Parking), and D10 (Air, Noise and Microclimate).
- 4.11 <u>Officer Response:</u> It is considered that the proposed amendments are minor, and would assist in better reflecting the relevant policy and guidance which the SPD seeks to be in general conformity. Including the amendments where appropriate would continue to ensure that the guidance set out in the SPD would remain robust.

#### Transport for London (Infrastructure Protection)

- 4.12 TfL (Infrastructure Protection) is noted as responding to confirm no formal comments in relation to the drat SPD. However, to confirm that developments adjacent to TfL infrastructure will require consultation with TfL to be undertaken.
- 4.13 <u>Officer Response:</u> This response is noted and consultation would be carried out as this is already undertaken. No amendments to the draft SPD are required.

#### Environment Agency

4.14 The Environment Agency is in general support of the draft SPD, and confirm that the SPD will support the Local Plan's commitments to sustainable development and positive environmental outcomes. The response notes the design principles and does not state that there are any further required to assist in addressing their concerns. Notwithstanding this, the Environment Agency has made a number of suggestions in relation to the guidance covering biodiversity, green infrastructure and lighting. Minor amendments under these deign guidance principles have been made where appropriate and ensure the guidance meets the intent and purpose of the SPD.

#### Historic England

- 4.15 Historic England is the Government's advisor on the historic environment, and seek to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.
- 4.16 Historic England has provided a number of general comments in relation to the draft SPD, which generally seek to place more emphasis on heritage assets. Following the general comments, the Historic England response provides an appendix with a number of suggested amendments. The proposed amendments are minor in nature, and are intended to assist in ensuring that heritage matters are addressed as robustly as possible to ensure ongoing protection of assets and their significance.
- 4.17 <u>Officer Response:</u> The majority of the proposed minor amendments have been incorporated into the guidance, which still ensure the intent and purpose of the SPD would be achieved. It is considered that the SPD through guidance set out in the Assessing context (Section 2.2) and design principles (Section 3) provide sufficient emphasis on the importance of heritage assets and how proposals should address these as part of the design process.

#### Natural England

4.18 Natural England provided a response to confirm that the topic of the Supplementary Planning Document did not appear to relate to their interests to any significant extent. No formal comment was therefore provided. Natural England also had no comment to make on the Strategic Environmental Assessment.

#### **General Responses**

4.19 As set out in section 3 above, a total of 178 responses were received in response to the consultation. The substantive comments received, officer responses, and proposed amendments to the draft SPD are set out in Appendix 1. However, the following provides a summary of responses received and officers responses.

- 4.20 <u>Officer Response</u>: Across the consultation responses, multiple suggestions of definitions of what a tall building should be were provided. Definitions ranged from anything higher than the existing height, up to a maximum height of 12 storeys.
- 4.21 A SPD is unable legally to set a height or location for tall buildings, as that would fall outside the legal remit of a SPD. Rather, this would have to be set through a Local Plan policy as part of the Local Plan review and would ensure general conformity with the London Plan (2021). The SPD is seeking to provide guidance to buildings that are less than the tall building definition as set out in policy D9A (Tall buildings) of the London Plan (2021).
- 4.22 The SPD is overreaching its remit and does not accord with the London Plan (2021) by introducing a definition less than that set out in Policy D9 (Tall buildings) of the London Plan (2021). It will reduce affordable housing delivery.
- 4.23 <u>Officer Response</u>: The SPD is clear that the guidance does not set a definition for a tall building. The SPD is clear that Policy D9 (Tall buildings) of the London Plan (2021) sets out a tall building definition and provides policy on how boroughs, through development plans must address tall buildings. The SPD provides guidance on how to contextually determine what would be a high building within a certain location within suburban Harrow, which would be less than what is defined as a tall building in the London Plan (2021). The SPD does not provide a presumption against high buildings, rather it seek to ensure height is progressed appropriately and any proposals are of a high quality design. The delivery of housing, especially affordable housing, will continue to a key pressure to deliver. However, the delivery of housing should not be at the expense of high-quality design.
- 4.24 It is noted that the GLA in their response (summarised above) has not objected to the SPD in relation to conformity with the London Plan (2021) and is supportive of the guidance (subject to their suggested amendments).
- 4.25 The Harrow local plan review is currently being progressed and this will address tall buildings and will seek to be in general accordance with D9 (Tall buildings) of the London Plan (2021).
- 4.26 The proposal needs more consultation
- 4.27 <u>Officer Response:</u> The SPD has been consulted in accordance with the Harrow Statement of Community Involvement, with the consultation undertaken agreed by Harrow Cabinet. Furthermore, the statutory timeframe was extended to seven weeks to allow for the Easter Holiday period. All relevant consultation material has been available online and in hard copy (Greenhill Library) and advertised through numerous channels as set out above under section 3. Online public consultation events were held to allow further information to be sought and questions to be asked of officers in relation to the proposed SPD. Any development proposals will be subject to consultation as part of the planning application stage. Officers are satisfied that the consultation undertaken is appropriate.

- 4.28 The draft SPD Is not definitive enough
- 4.29 <u>Officer Response:</u> A SPD is a guidance document to adopted policies within the Local Plan, and is unable to be as definitive as a policy within the Local Plan. The draft SPD must allow sufficient flexibility to allow applicants to achieve an appropriate development without stifling creativity. The draft SPD provides guidance to assist in developments achieving appropriate height and a high quality of design.
- 4.30 Need to clarify both floors and meters when referring to a building height.
- 4.31 <u>Officer Response:</u> It is agreed that providing both floors and meters would provide greater clarity where appropriate and this is reflected in the revised SPD.
- 4.32 Existing developments are not of a high quality.
- 4.33 <u>Officer Response:</u> The draft SPD is unable to influence existing developments that have already been implemented, however would be able to assist in improving the design quality of future developments.
- 4.34 A number of precedents were considered to not be representative of good quality development examples.
- 4.35 <u>Officer Response</u>: Precedents were provided where they were able to visually demonstrate a successful element of design that is seeking to be achieved through the design principles. The precedents have been reviewed and updated examples provided where appropriate from across London which are considered to be of high-quality design.
- 4.36 Clarification of overly prominent definition
- 4.37 <u>Officer Response:</u> It is noted that the term overly prominent is a relatively subjective term. However, what would be overly prominent can only be determined following the context based analysis (following the process set out in the SPD) and will be defined on a case by case basis.
- 4.38 There should be a clear presumption against any development above the current height in the area. Also, the policy should operate only by reference to current heights as of 2023 (i.e. any future development of taller buildings shouldn't "move the goal posts" and make it easier to develop more tall buildings.)
- 4.39 <u>Officer Response:</u> The Harrow Characterisation & Tall Building Study (2021) sets out that at twice the prevailing height there is the potential for harm to the character of the area. Furthermore, the London Plan (2021) sets out that in development plans, boroughs must recognise that local character evolves over time. Whilst the SPD does not form part of the development plan, it must be drafted in a manner that will comply with policy set out in the new local plan (which will have to demonstrate general conformity with the London Plan).

Whilst character will evolve over the time, the SPD seeks to ensure that this will occur appropriately.

- 4.40 The Harrow & Wealdstone Opportunity Area is not included within the remit of the SPD as there are residents within this who would wish to be protected from tall buildings.
- 4.41 <u>Officer Response:</u> The SPD does not include the Harrow & Wealdstone Opportunity Area (as set by the London Plan (2021)), as this is an area that is where growth is directed and is subject to more significant change. Conversely, the suburban areas of Harrow as an outer London borough, are much more susceptible to the impacts of development. For this reason the SPD seeks to ensure development in the suburban context of Harrow respects that character of that area.
- 4.42 Whilst the SPD would not be applicable to developments with the Harrow & Wealdstone Opportunity Area, they would nonetheless be subject to the Development Plan (Harrow Local Plan (2013) and London Plan (2021)), which would provide relevant policies for assessment.
- 4.43 Going forward, the Council has committed to reviewing its local plan, which in seeking to ensure general conformity with the London Plan (2021), will need to proactively plan for tall building developments (as required by Policy D9 (Tall buildings) of the London Plan (2021). This will involve identifying appropriate locations for tall buildings, what height of a building would constitute a tall building, and also appropriate heights of such developments. Following the local plan review, further mechanisms such as design codes are also available for the Council to consider.
- 4.44 Lack of infrastructure to support new development (Such as highways / doctors / school places)
- 4.45 <u>Officer Response</u>: New development attracts a 'tax' through the Community Infrastructure Levy (CIL), which is collected by the Mayor of London and also by the Council. The purpose of collecting CIL money is to assist in the funding of new infrastructure.
- 4.46 Furthermore, the Council has an ongoing dialogue with infrastructure providers such as the NHS to understand their needs, and look to secure floor space for them within new developments where they have identified a need.
- 4.47 The SPD is not proposing a presumption in favour of new development, rather setting out guidance to assist in new developments being appropriate in height and of a high-quality design. Such proposals have been and are coming forward already, and without such detailed guidance. Funding infrastructure through the CIL is considered the appropriate mechanism for infrastructure improvements.

#### Ward Councillors' comments

- 4.48 The SPD was submitted to the Planning Policy Advisory Panel (PPAP) throughout the drafting of the SPD, which is a cross party advisory panel. Members of the Panel are able to express views and give comment in relation to the drafting of the SPD and other members can attend / ask questions. Ward members were also able to provide feedback though the online EngagementHQ platform, through emailing direct to the Planning Policy Team, and / or by attending the two online engagement workshops.
- 4.49 Comments received from Ward Councillors, along with all responses are included within the Schedule of Representations and Responses attached as Appendix 1.

#### 5.0 **Proposed amendments**

- 5.1 In light of the representations received and the Council's response to them (summarised in section 3 above and detailed in Appendix 1), a number of amendments have been made to the draft SPD (comprehensive list attached as Appendix 2). The majority of the amendments have been minor, and have sought to provide more clarity or consistency with other legislation and / or guidance. The following amendments are considered those more notable;
  - a) The term 'contextually tall building' has been replaced with the term 'contextually high building'.
  - b) Greater clarity of scope of where to use / how to use the SPD in terms of location and for types of development.
  - c) Review and update of particular precedents which better reflect high quality design as sought by the design principles within the SPD.
  - d) Removal of the traffic light system flow chart under Chapter 1 How to use this document. This has been replaced by a more simplified diagram for assessing context in Chapter 2.
  - e) Greater clarity between the role of the SPD in dealing with context and the much separate role of Policy D9 of the London Plan (2021).
  - f) Minor text changes with respect to consistency of terminology and with other relevant policy and guidance.
- 5.2 Prior to final publication, the SPD will be subject to desktop publishing to improve its legibility. It should be noted that some additional, or minor, modifications to the SPD have also been made. These are minor changes that have been made to provide clarity, improve grammar, spelling corrections and factual changes where needed (for example, the document no longer being in draft form).
- 5.3 It is considered that the amendments made to the draft SPD result in a more robust document, respond to the consultation responses where appropriate, and would continue to assist in ensuring new development within suburban

Harrow would respect the character of the that area. It would continue to deliver against the priority of the Council in putting residents first.

### **6.0 Options Considered**

- 6.1 An alternative option considered is to not amend the SPD to reflect the consultation undertaken and the corresponding responses. Whilst not all consultation responses are able to be included as amendments as they are not all appropriate / would not improve the application of the SPD, failing to amend the SPD where appropriate would result in a less robust document. Not including appropriate amendments to the SPD from the consultation process is not considered an appropriate option.
- 6.2 An alternative option to the adoption of an SPD which is to do nothing (i.e. not to adopt the amended SPD). If the 'do-nothing' option was pursued Council officers, the Planning Committee and in certain cases, Planning Inspectors, would continue to exercise judgement when making decisions on specific proposals that developers put forward, but without the guidance the SPD would provide. However, such an approach without this overall agreed guidance for determining contextually tall buildings and associated guidance, will lessen the tools available to the Council to resist developments that are contextually inappropriate within suburban Harrow.

### **Conclusion**

- 6.3 The draft SPD seeks to provide a context-based approach to addressing height across the suburban areas of the borough, and to ensure that developments are of a high design quality specifically where they are taller than the surrounding buildings and pattern of development. The SPD has been subject to a wide and thorough consultation process that is in compliance with the adopted Harrow Statement of Community Involvement and wider Council consultation standards. All of the consultation responses have been reviewed and considered, and where appropriate amendments made to the draft SPD.
- 6.4 The amendments to the SPD following the consultation process are considered to provide a robust document, that will continue to meet the intention of the council priority of putting residents first and protecting Harrow suburbs from inappropriate development.

### 7.0 Implications of the Recommendations

### Considerations

### 8.0 Resourcing

8.1 The project has been resourced internally by the Planning Policy Team, from the existing revenue budget. Significant input has been required from the Council's Principal Urban Design Officer (located within Development Management).

### 9.0 Ward Councillors' comments

9.1 Ward Councillor input was able to be received though the formal consultation on the draft document.

### **10.0 Performance Issues**

10.1 The SPD will assist in delivering high quality development that respects the suburban character of Harrow.

### **11.0 Environmental Implications**

- 11.1 Sustainability appraisals for supplementary planning documents are only required in exceptional circumstances, but the Council must still consider whether there is a requirement for strategic environmental assessment (SEA). The Harrow Core Strategy (2012) and the policies contained within it were subject to a Sustainability Appraisal. The proposed SPD does not (cannot) introduce new policy but simply supplements / guides new development within the borough in relation to development policies located within the current London Plan and Harrow Local Plan, and any relevant new policy within the revised Local Plan.
- 11.2 The Council undertook a SEA as part of the consultation package for the draft SPD. It concluded that the SPD would not require a SEA. The three statutory bodies were consulted. Historic England, Environment Agency and Natural England, each confirmed they agreed or had no comment on the content of the SEA. The Council therefore confirm that a SEA is not required in the preparation of the SPD.

### **12.0 Data Protection Implications**

12.1 Consultation was undertaken in a manner that complies with the relevant requirements of the General Data Protection Regulations (GDPR), including the collection, processing, retention and disposal of personal data of those responding.

### **13.0 Procurement Implications**

13.1 There are no procurement implications in the drafting of the Tall Building ('Building Heights') SPD, which has been drafted by London Borough of Harrow officers. The external consultancy support (for the facilitation of online consultation events and external legal advice) was modest in value and procured in accordance with the applicable procurement procedures. Funding for this was from the existing Planning Policy budget.

### 14.0 Risk Management Implications

Risks included on corporate or directorate risk register? **No** 

Separate risk register in place? **No** 

The relevant risks contained in the register are attached/summarised below. N/A

The following key risks should be considered when agreeing the recommendations in this report:

Risk Description	Mitigations	RAG Status
Non-compliance with regulatory requirements for the preparation of any guidance (i.e. scope of guidance, process.)	<ul> <li>Scope of guidance has had regard to previous Counsel advice regarding this.</li> <li>Process (including formal consultation) has been managed to ensure it complies with regulatory requirements.</li> </ul>	Green
Non-(general) conformity / consistency with Harrow development plan (i.e. London Plan, Harrow Local Plan)	<ul> <li>Drafting has been undertaken in context of existing development plan.</li> <li>Drafting of the SPD has been undertaken with development of relevant policy as part of Local Plan review to be considered in an effort to reduce any potential conflict with future Local Plan policy.</li> <li>Informal consultation has been undertaken with the Greater London Authority (GLA) to ensure compliance with the London Plan (2021) and the document amended in response to formal representations from the GLA.</li> </ul>	Green
Residents and Members not satisfied with the document and proposed amendments to address consultation responses.	<ul> <li>Consultation feedback addressed and amendments made to SPD to address appropriate comments received.</li> <li>It may however not be possible to fully address all concerns raised in relation to the draft document given the broader policy context and range of competing views</li> </ul>	Amber

Risk Description	Mitigations	<b>RAG Status</b>
The GLA has raised the issue of the title using the word 'Tall'. The Council has made it clear that this is for use in Harrow within a local context and is content to retain the title using the word 'Tall'. The GLA could refer this to the Secretary of State and this might entail the Council reviewing the SPD title. However, this outcome is unlikely to happen.	<ul> <li>Review the title of the SPD in the light of any action in this area should it occur</li> </ul>	Amber

### 15.0 Legal Implications

- 15.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that, if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.
- 15.2 The Town and Country Planning (Local Planning) (England) Regulations 2012 provide guidance on the preparation and adoption of supplementary planning documents.
- 15.3 Although the proposed draft SPD is not a development plan document it will, on adoption, be a material consideration in the determination of tall building development proposals within the London Borough of Harrow.
- 15.4 The Council is required by law to consult on the draft SPD and to consider all consultation responses received before adopting the SPD. As soon as reasonably practicable after adopting an SPD, the Council must (i) make available the SPD and an adoption statement and (ii) send a copy of the adoption statement to any person who asked to be notified of the adoption of the SPD.
- 15.5 By definition, supplementary planning documents cannot introduce new policies nor modify adopted polices and do not form a part of the development plan. Rather, their role is to supplement a 'parent' policy in a development plan document. The SPD supplements Policy DM1 (Achieving a High Standard of Development of the Harrow Development Management Policies Local Plan (2013).

### **16.0 Financial Implications**

16.1 The cost of preparing and implementing the SPD has been met from Planning Policy Team and Development Management (Urban Design) resources.

### **17.0** Equalities implications / Public Sector Equality Duty

- 17.1 The Equality Act 2010 outlines the provisions of the Public Sector Equalities Duty which requires Public Bodies to have due regard to the need to:
  - a) Eliminate discrimination, harassment and victimisation and other contact prohibited by the Equality Act 2010.
  - b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
  - c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The broad purpose of this duty is to integrate considerations of equality into day-to-day business and keep them under review in decision making, the design policies and the delivery of services.

- 17.2 The relevant protected characteristics are age, race, disability, gender reassignment, pregnancy and maternity, religion or belief, sex and sexual orientation.
- 17.3 The SPD aims, among others, for an inclusive and safe development for all and therefore advances equality of opportunity for all and is not considered to adversely impact on persons within the protected characteristic.
- 17.4 In addition, the proposed SPD the subject of this report will provide guidance and supplement adopted policies within the Harrow Core Strategy and Development Management Policies in the Local Plan. A full equalities impact assessment was carried out at each formal stage in the preparation of the Core Strategy and Development Management Policies Local Plan.

### **18.0 Council Priorities**

#### 18.1 Putting residents first.

1. The progression of a Tall Buildings ('Building Heights') Supplementary Planning Document was a manifesto commitment by the new administration. This report sets out the drafting of a Tall Buildings ('Building Heights') SPD, which would reflect the priorities of the Council to put residents first. Any changes proposed to the draft SPD in response to consultation feedback, is considered to still to meet the intent of this council priority.

### 2. A borough that is clean and safe

The Tall Buildings ('Building Heights') SPD will provide guidance in terms of high-quality design for buildings and also public realm. Along with good design principles underpinning this guidance, consultation with relevant authorities (waste, Metropolitan Police) to assist in new developments contributing to the borough being both clean and safe.

### 3. A place where those in need are supported

The Tall Buildings ('Building Heights') SPD provides guidance on ensuring that new developments optimise sites and deliver against the requirements of the development plan. This would ensure that developments are able to provide for infrastructure such as wheelchair accessible units and affordable housing.

### **Section 3 - Statutory Officer Clearance**

### Statutory Officer: Jessie Man

Signed on behalf of the Chief Financial Officer

Date: Cleared by email: 26.06/23

### **Statutory Officer: Jimmy Walsh**

Signed on behalf of the Monitoring Officer

Date: Cleared by email: 29.06.23

**Corporate Director: Dipti Patel** Signed by Corporate Director

Date: 3 July 2023

### **Chief Officer:**

Signed off by the Chief Planning Officer

Evans.

Date: 4 July 2023

### Head of Procurement: Nimesh Mehta

Signed on behalf of the Head of Procurement

Date: Cleared by email: 22.06.23

### Head of Internal Audit: Neale Burns

Signed on behalf of the Interim the Head of Internal Audit

Date: Cleared by email 27.06.23

### **Mandatory Checks**

Ward Councillors notified: No, as it impacts on all Wards. Cabinet consideration will be a Key Decision. EqIA carried out: No: refer to paragraph 17 above EqIA cleared by: N/A

### **Section 4 - Contact Details and Background Papers**

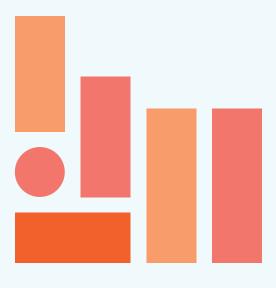
**Contact:** Callum Sayers, Principal Planning Policy Officer, 077 3159 1724, <u>callum.sayers@harrow.gov.uk</u>

### **Background Papers:**

- National Planning Policy Framework (2021)
- London Plan (2021)
- Harrow Local Plan

Appendix 1: Consultation Statement: Schedule of Representations and Responses & Summary of online consultation events

Appendix 2: Harrow Tall Building ('Building Heights') Supplementary Planning Document



## Tall Buildings (Building Heights)

### **Supplementary Planning Document**

London Borough of Harrow July 2023 47



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.

Published July 2023

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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

Aerial view of Kenton, London Borough of Harrov, 50



# Introduction

### The Council's vision for height

- 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.

### How to use this document

- 1.2.1 This SPD provides guidance on the assessment 1.2.2 Guidance within this SPD should be used by 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.
- 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.

### 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.

### 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: **Prevailing height Context analysis** Contextually high definition

Key topics covered: Place, Architecture & Good Growth themes **Design Objectives Design Principles** 

Key topics covered: The application process Supporting assessments The planning process

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### Where to use this document

- 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.
- 1.3.1 This SPD is to be used for proposals that relate 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.

of Harrow

**London Borough** 

### Area where Tall **Buildings** (Building Heights) SPD applies

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

Figure 1B

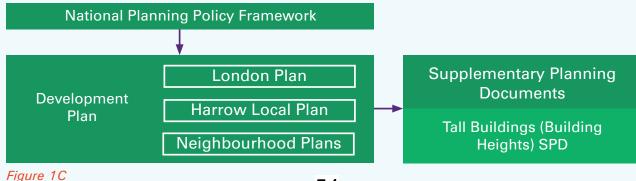
### Status of this document

The 'Harrow Planning Maps' website, which shows the **Opportunity Area** boundary, can be accessed via this link.

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<sup>1.4.1</sup> 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.



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### **Developing this document**

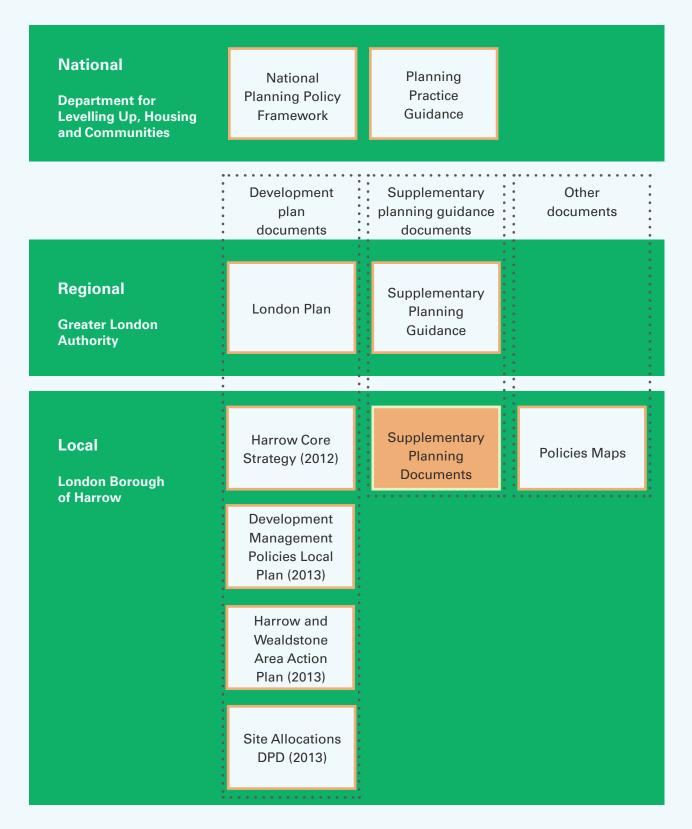
### Why has this Supplementary Planning Document been prepared?

- 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.

### **Policy context**

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



### 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;
- b. 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<br/>against the development plan, which in London<br/>includes the London Plan (2021). Therefore<br/>applications must demonstrate compliance<br/>with the London Plan, along with Local Plan<br/>documents also.New development that is taller than its<br/>surrounding context, but does not mee<br/>the definition of a tall building as set ou<br/>Policy D9 (Tall buildings) of the London<br/>(2021), will not automatically be considered.
- 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.

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 1.6.15 This SPD provides guidance in relation 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.

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 is it is situated. It goes onto 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.
  - 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.
- 1.6.12 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
- 1.6.16 Guidance provided within this SPD will inform a tall buildings policy within the new local plan.

Policy DM 1: 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.
- 3. 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;
- the need to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit;
- 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.

#### 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 building's 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.

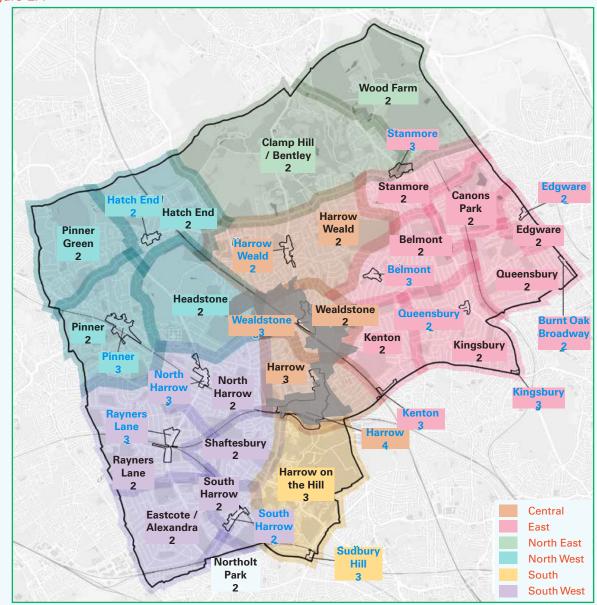
## 2.0

Understanding height and Harrow's suburban character

### Determining prevailing height

### 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.



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 2A

	Neighbourhood	Prevailing	Contextually	Tall Building	Figure 2B
	or Town Centre	Height (storeys)	High Building (storeys)	London Plan Policy D9 (storeys / metres)	
		(Storeys)	(3101693)	(3016937 11161163)	
Ì	Pinner	2	≥4	6 / 18m	
st	Pinner Town Centre	3	≥ 6	6 / 18m	
North West	Pinner Green	2	≥ 4	6 / 18m	]
	Hatch End	2	≥ 4	6 / 18m	
Ž	Hatch End Town Centre	2	≥ 4	6 / 18m	
	Headstone	2	≥ 4	6 / 18m	
	North Harrow	2	≥ 4	6 / 18m	]
	North Harrow Town Centre	3	≥ 6	6 / 18m	1
	Rayners Lane	2	≥ 4	6 / 18m	1
/est	Rayners Lane Town Centre	3	≥ 6	6 / 18m	1
th M	Eastcote/ Alexandra	2	≥ 4	6 / 18m	1
South West	Shaftesbury	2	≥ 4	6 / 18m	1
0)	South Harrow	2	≥4	6 / 18m	1
	South Harrow Town Centre	2	≥ 4	6 / 18m	1
	Northolt Park	2	≥4	6 / 18m	1
	Clamp Hill/ Bentley	2	≥4	6 / 18m	
NE	Wood Farm	2	≥4	6 / 18m	
	Harrow Weald	2	≥ <b>4</b>	6 / 18m	-
	Harrow Weald Town Centre	2	≥ 4	6 / 18m	
tral	Wealdstone	2	≥4	6 / 18m	
Central	Wealdstone Town Centre*	3	≥ 6	6 / 18m	
0	Harrow	3	≥ 6	6 / 18m	1
	Harrow Town Centre*	4	≥ <b>8</b>	6 / 18m	-
	Harrow on the Hill	3	≥ 6	6 / 18m	
S	Sudbury Hill	3	≥ 6	6 / 18m	
	Stanmore	2	≥ <b>4</b>	6 / 18m	
	Stanmore Town Centre	3	≥ 6	6 / 18m	1
	Belmont	2	≥ 4	6 / 18m	1
	Belmont Town Centre	3	≥ 6	6 / 18m	
	Canons Park	2	≥ 4	6 / 18m	1
	Edgware	2	≥ 4	6 / 18m	1
st	Edgware Town Centre	2	≥4	6 / 18m	
East	Queensbury	2	≥4	6 / 18m	1
	Queensbury Town Centre	2	≥ <b>4</b>	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	
					1

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 2.1.7 A requirement to determine prevailing 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 2.1.8 Figure 2C shows how an assessment of 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.
- building height does not negate the need for a Townscape and Visual Impact Assessment (TVIA), where needed or for other massing impact testing.
- 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. 63

### Assessing context

### **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.

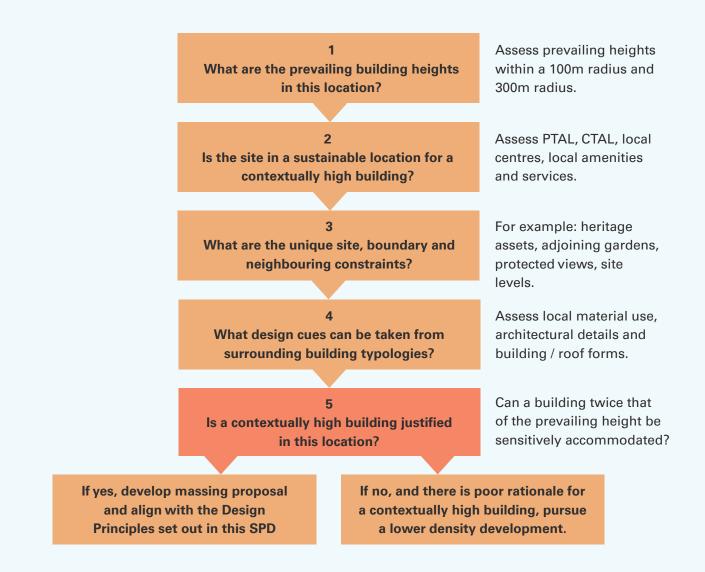


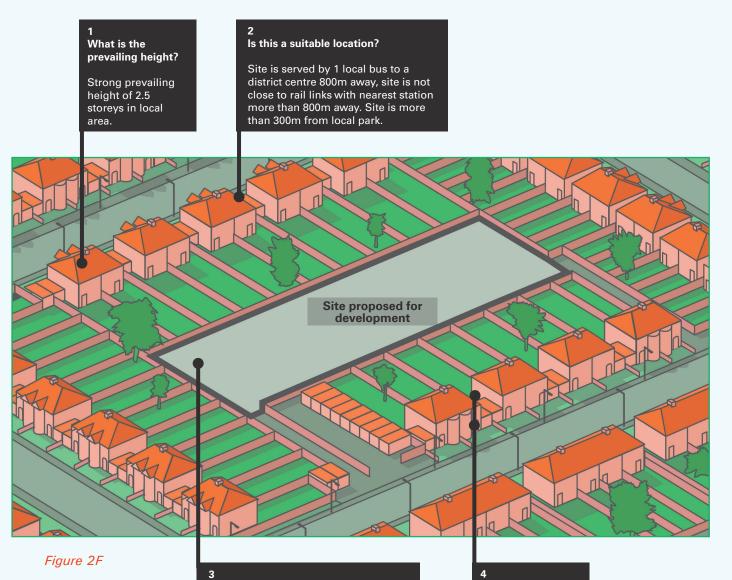
Figure 2E

### Assessing context: Worked examples

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**



#### What are the site constraints?

Site has no street frontage and adjoins rear gardens to all boundaries making overlooking and overbearing more likely. Small footprint semi-detached dwellings are predominant. What are the local design cues?

Gable end tiled roofs, Arts and Crafts arches to entrances,

### Example 2: Suburban Neighbourhood Parade

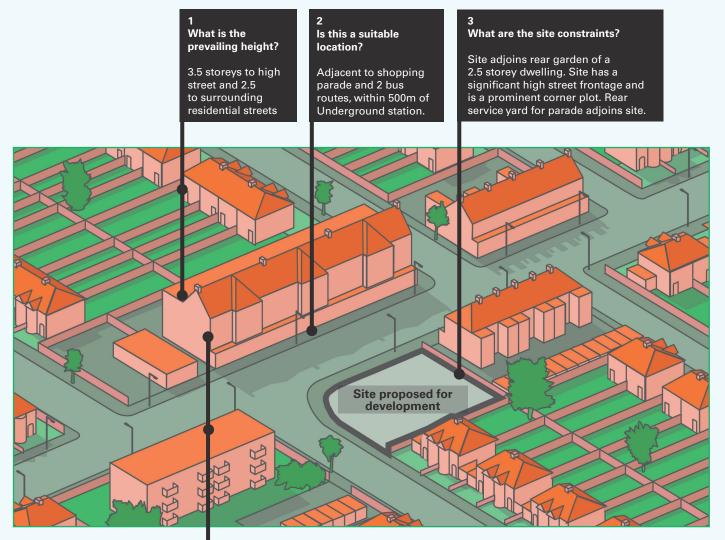


Figure 2G

#### What are the local design cues?

4

Art Deco parades with pitched roofs, brick facing material is common for old and newer flatted housing, Decorative chimneys and flat roofs also feature.

### **Example 3: Suburban District / Local Centre**

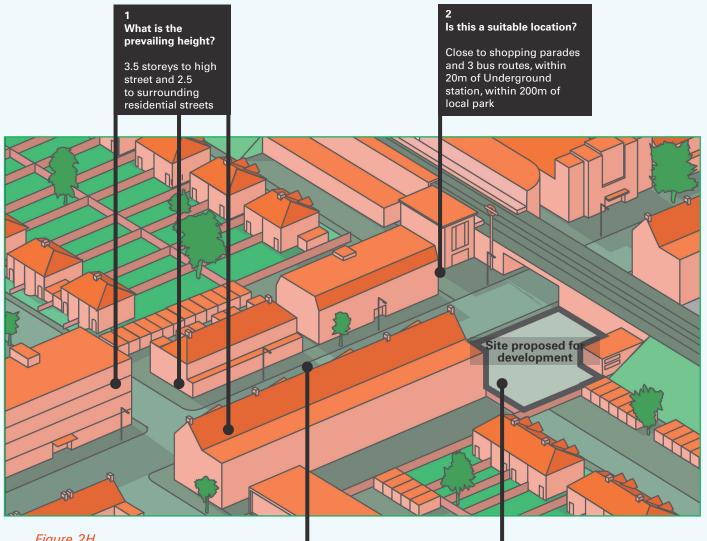


Figure 2H

#### What are the local design cues?

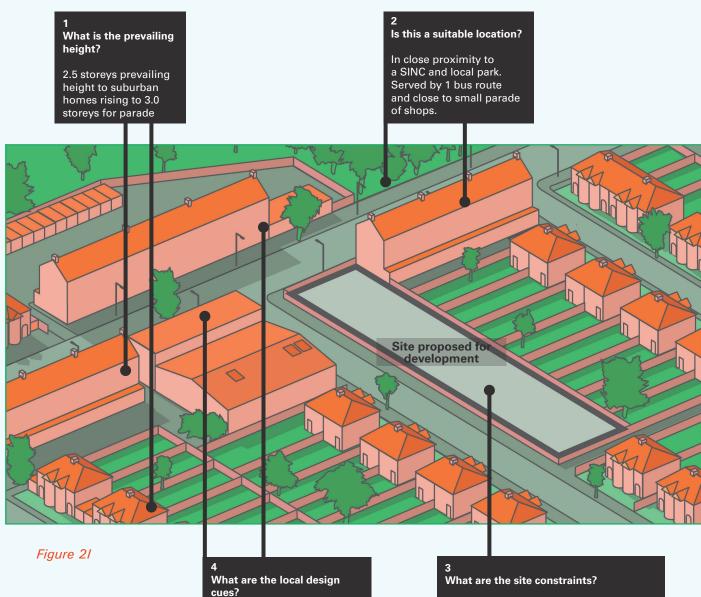
4

Art Deco station, decorative lintels and parapet to parade, tiled roofs to surrounding dwellings

#### 3 What are the site constraints?

Site adjoins the railway line and high street with potential noise pollution issues to both, adjoins existing 3 storey parade, adjoins suburban cul-de-sac to rear.

### **Example 4: Suburban Mixed Character**



Flat roof post-war office block with large glazed areas, 1960s parades with infill panels, corrugated warehouse unit.

Site faces multiple rear gardens and adjoins a pedestrian alley. Site is a corner plot facing a B road and residential road. Site faces a warehouse and logistics facility with a high volume of traffic.

### What is a tall building?

2.5

### 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.

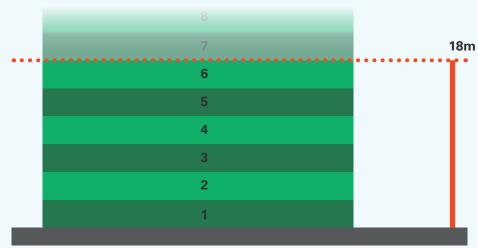


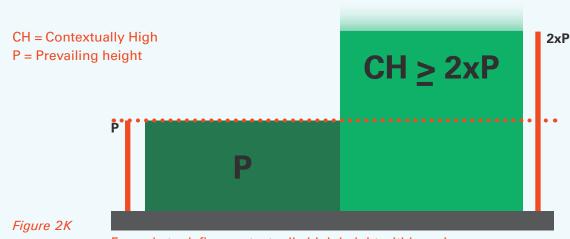
Figure 2J

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

### What is a contextually high building?

### 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'.



Formula to define contextually high height within a given area

70

### 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.



Proposed building is 1x prevailing height (P)



Proposed building is 1.5x prevailing height (P)



Proposed building is 2x prevailing height (P)

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.

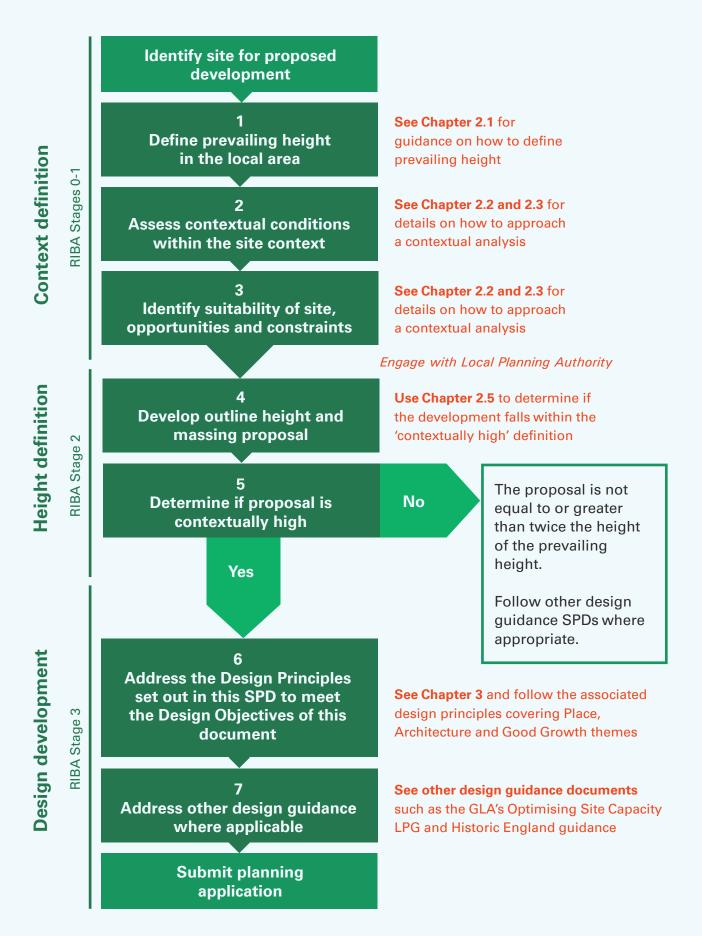
A proposed building height which matches that of its prevailing context presents the least impact on an area and more easily visually integrates with its immediate and wider contexts.

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.

- 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



## 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

# **Overview of design guidance**

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

Place		
Design Objective A	Design Objective B	Design Objective C
Respect the character of suburban Metroland	Protect built and landscape heritage	Locate height appropriately
Design Principles A1- A3	Design Principles <b>B1- B3</b>	Design Principles C1-C4
Architecture		
Design Objective D	Design Objective E	Design Objective F
Liveable places	High-quality external design	Sustainable and climate-friendly design
Design Principles D1- D11	Design Principles <b>E1 - E4</b>	Design Principles <b>F1- F6</b>
Good growth		
Design Objective G	Design Objective H	Design Objective I
Optimise land use	Provide new homes	Deliver economic growth
Design Principles <b>G1</b>	Design Principles H1- H2	Design Principles I1-I3

Figure 3A

# Place

- 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.



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#### 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.

3.2

# Design Objective A Respect the character of suburban Metroland

- 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.





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.

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# 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 .



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



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Becontree Avenue by Archio shows how an apartment typology can sensitively coexist amongst semidetached 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 3.3.13 Massing at site edges and boundaries must 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 higherdensity development.

- 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).



The outline masterplan for Grange Farm, South Harrow by Hawkins Brown shows how a new largescale development can integrate with a range of contexts by varying height and massing across the scheme. Height is stepped down from taller apartmetn 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.

#### Figure 3G

- 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.

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#### 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 3J



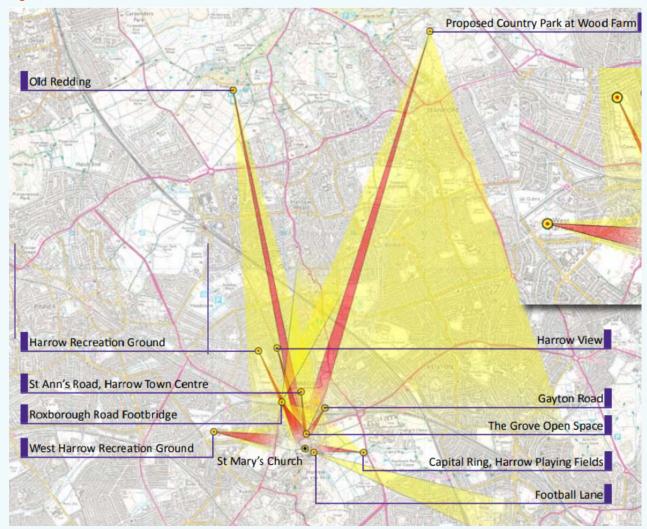
New development can enhance existing heritage assets. New housing at Bentley Priory sensitively responds to the listed buildings and Registered Park and Garden at the site through appropriate scale, sensitive and referential material choice and neoclassical-inspired elevations. This allows for the addition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

#### Figure 3I

35

#### 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 sitting 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 it's location at the upper reaches of the London basin, there is a general rise in levels in from south to 3.4.9 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.

<sup>1.9</sup> 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.



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

Figure 3N

# 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**

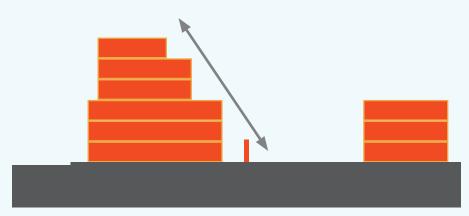
- 3.5.11 Proposals have the potential to cause harm to adjoining properties due to poor siting of massing and window openings.
- 3.5.12 Height and massing must be located with regard to the proximity and outlook of neighbouring buildings, minimising harm caused through overbearing and loss of light and 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.



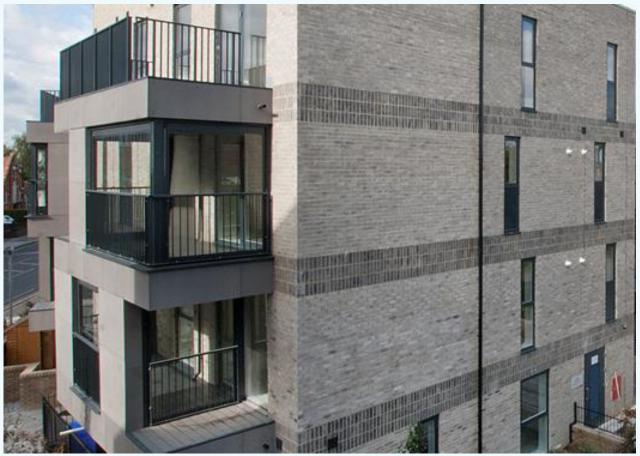
Height is positioned to respect views from habitable room windows of neighbouring buildings and massing is stepped back from boundary lines to reduce overbearing.

Figure 3P

# **Architecture**

- 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, wellresolved and rich architecture can add to the vitality of the borough's built environment and contribute to a rich and varied townscape.

#### Figure 3Q



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. 88

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.



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.

90

#### Figure 3S

# **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.





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, insetting 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





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.

# **Transport and parking**

- 3.7.19 Higher occupancy levels for proposals may place increased demand on transport infrastructure. Proposals that result in a higher 3.7.22 Where a basement, undercroft or service 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 wellconnected 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.

- 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/lcdschapter8-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.

# **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. Welldefined 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.

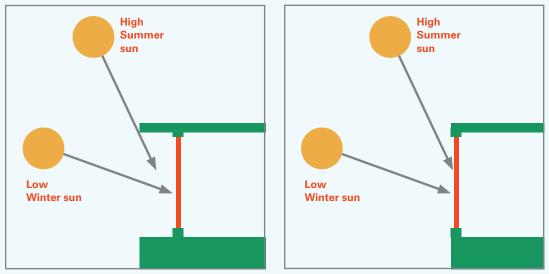
# Solar gain

- 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





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.

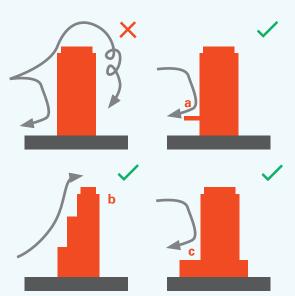
# Air, noise and microclimate

- 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 3.7.45 Conducting a microclimate analysis while noise levels created by air movement, building use or operational machinery to maximise the enjoyment of internal and open spaces in

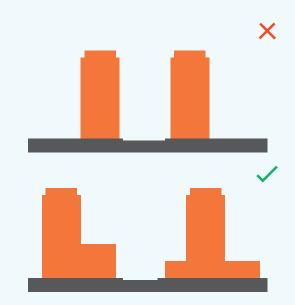
and around a building. The impacts of noise to homes from noise-emitting sources such as industrial sites or major thoroughfares should be fully mitigated against. In the first instance, buildings should be sited away from such sources and habitable rooms should face away. Winter gardens and triple glazing 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.
  - 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 3.7.49 Major applications must meet Urban Greening 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).

- 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, wellproportioned interwar parades to Modernist detached houses and Art Deco mansion blocks. The next generation of development in the borough should respond with equally highquality 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.

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.



ly referential to l imaginative ssist in hitectural row-centred

#### Figure 3AB

# Form and composition

- 3.8.3 Taller buildings are typically comprised of three 3.8.4 Modulating building massing to express the 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.
- 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.



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

Figure 3AC

#### Тор

- 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.
- <sup>3.8.6</sup> 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.



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 wellresolved 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

#### Figure 3AE

THEFT

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**

LLLLLLLLLLLLL

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

> 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.

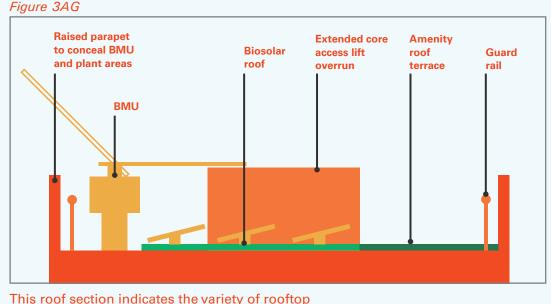




Materials should be specified which are robust, hard-wearing and age well. Brick, stone and other natural materials are typically more appropriate than composite materials. Light-coloured render should be avoided due its likeliness to stain and spall.

## 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 3 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.



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 zerocarbon 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



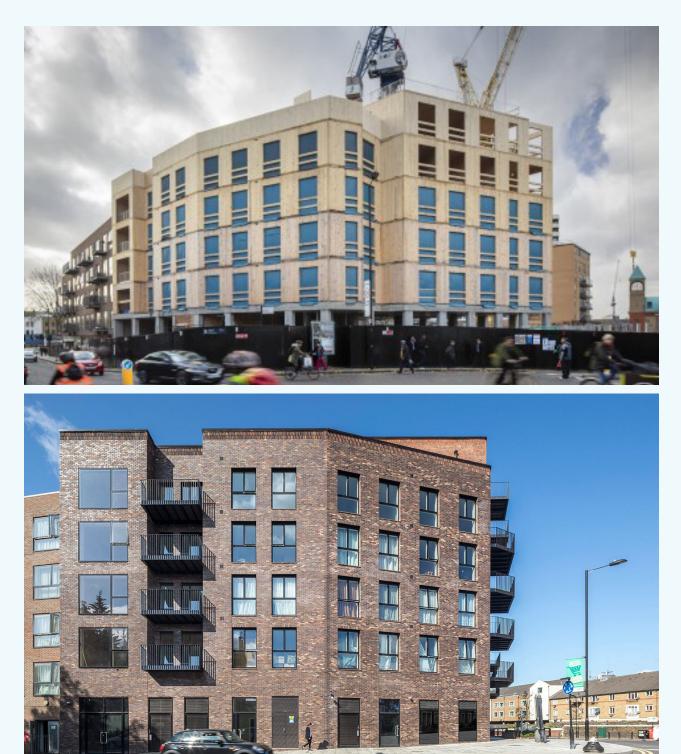
Sustainable design can often be invisible to passers-by. Agar Grove in Camden is an example of a contextually high development which is Passivhaus accredited and highly energy efficient.

# **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 3 design.
- 3.9.3 Proposals should explore the use of lowcarbon 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.

#### 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 though the 3.9.17 Proposals should enhance and increase 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.
- 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.

### Good Growth

- 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.

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.
- 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

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

- 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.
- 3.12.7 Proposals should seek to deliver a mix of

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. 3.13.1 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 nonresidential uses should be considered. This should initially be provided at ground floor level, however proposals for solely nonresidential 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 than 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.

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#### 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 I3**

#### Social and cultural life

- 3.13.10 Harrow's social and cultural infrastructure 3. 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

## The application process

- 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

## Supporting assessments for tall or contextually high building proposals

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.

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

**Protected Views Assessment** 

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

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).

## The planning process

- 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.	



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1 R	esident 1	A tall building definition is unable (legally cannot) adopt a tall
		Harrow should adopt a definition of tall buildings. I think that should be > building definition. This will be considered as part of the Local Plan
		5 stories. Review. No amendment considered necessary
		A building maximum height is unable (legally cannot) to be imposed
		on developments. Each application must be considered on its own
		12 stories should be the maximum for new tall buildings in Harrow merit. No amendment considered necessary
		A tall building designated area is unable (legally cannot) adopt a tall
		Harrow should allow tall buildings in strictly designated areas only. building definition. This will be considered as part of the Local Plan
		Review. No amendment considered necessary
		Economic opportunity areas and in close proximity to anywhere where a
		tall building already exists is where they should be allowed. Theses close
		proximity areas should be strictly defined and not allowed to further
		expand after they are further developed. Within the proximity areas
		permitted tall buildings should not exceeed the height of a pre existing A tall building designated area is unable (legally cannot) adopt a tall
		building or 12 stories whichever is lower. building definition. This will be considered as part of the Local Plan
		Review. No amendment considered necessary
		No building should ever be taller than the 5 stories outside of these areas. Officers consider that the approach within the SPD allows for
		Any building exceeding 5 stories must give back to Harrow through flexibility and heights to be relative to the context and character of
		funding new infrastructure within the Borough. an area. All development that result in new floorspace (with some
		exceptions) must may Community Infrastructure Levey, which is a
		development tax used for funding local infrastructure. No amendment considered necessary
		The borough should encourage house building as well as flats. Use mixed The SPD seeks to provide guidance for contextually tall, and tall
		developments to encourage. buildings. However, the Council encourage a mix of housing types to
$\mathbf{N}$		allow for housing choice. No amendment considered necessary
<u> </u>		Buildings taller than 3 stories outside of the areas designated for tall Design Principle D2 (Overbearing & overlooking) provide guidance to
		buildings should be designed to avoid avorlooking private gardens and
		address overlooking, with Design Principle DS addressing fransport
		a Parking Provision is addressed by the London
		Plan (2021). No amendment considered necessary
		Building finishes should be free of cladding and concrete where used The SPD provides guidance to material & detailing through Design
		should account for 50% maximum of visible finish. Traditional 'yellow' Principle E3, specifically noting that an assessment of contextual
		London brick should be encouraged. material palettes and architectural features should be conducted as
		part of any application. this will allow the appropriate materials to be
		used on a development for the area in which it is located. No amendment considered necessary
		Tall building must have fire escape routes and be made from the best fire
		rotardant Matarials. All tall buildings should have a fire assanged and
		approved by LEP
		statement, with more sciuling and requirements for taner bundings. No amendment considered necessary
		Buildings should be well insulated and be specifically considerate of hot The SPD provides guidance on insulation through Design Principle F2
		summer weather. They should have effective heating with a low carbon (Passive design). Policies also within the wider development plan
		footprint. also address such matters. No amendment considered necessary
		All new development over 100sqm of floorspace is required to
		increases in housing capacity should be accompanied by expanded
		infrastructure - schools hospital GPs roads buses trains etc. funding used to fund new, and improvements to infrastructure to
		cater for new development. No amendment considered necessary
		Flash flood minimisation should also be a consideration for ALL new
		development on green/brown sites. Policies in relation to flood risk and the associated level of detail to
		address this matter is set out in the wider development plan. No amendment considered necessary
		Tree planting and green spaces should feature. Design Principle D11 (Greening) provides guidance on how
		developments should address green spaces. No amendment considered necessary

rr	1	1	1	
2 Resident 2		No more tall buildings please. Look how they changed the atmosphere	The SPD does not set a policy for or against tall buildings. However, it	
		and architecture of Ealing. Please don't do that to Harrow	looks to provide guidance to ensure appropriate heights along with high quality architecture.	No amendment considered necessary
3 Resident 3		We strongly object to TALL BUILDINGS In and around Stanmore and other local towns as they are considered as Suburban areas.	The SPD is not does not set a policy or designation for tall building locations or heights. it does provide a context based approach to any developments where height is proposed.	No amendment considered necessary
4 Resident 4		We fought Transport for London and Catalyst's (developer)proposal to build monstrous towers in Rayners Lane carpark and WON. But developers everywhere are trying to overdevelop communities to our detriment to make cash out of land near stations. The issue has not gone away and we need to remain vigilant and stop creating these monstrous tall buildings overlooking into our properties and creating large communities with adequate support services.	The SPD seeks to provide guidance to ensure new development respects the context of the suburban location within which is it located. Proposals will be required to the considered against the wider development plan also.	No amendment considered necessary
5 Resident 5		My recommended height would be 4 storey	The SPD seeks to provide a context based approach to determining what would be considered a contextually tall development in relation to its location. This will result in differing heights as a result of each location.	No amendment considered necessary
6 Resident 6		Tall buildings which mean increased densities in schemes will need the infrastructure of services to take the additional load from the project, This means greater pressure on water, sewage, electricity and gas to service the buildings, which must be available in an area already overloaded. There will also be need for school places and access to GP surgeries, hospitals and other community and public services already under strain. These must all be taken into account when assessing and taking forward a proposed development, which usually benefits the developer more than the facilities available to local residents.	All new development over 100sqm of floorspace is required to contribute to the Community Infrastructure Levy (CIL), which is funding used to fund new, and improvements to infrastructure to	
	Infrastructure:	These should be wide enough to be usable, rather than the pocket sized ones usually provided. A minimum of 6 feet, or 1800mm should be provided, and a plant box fixed to the balustrade to provide the opportunity for a 'green' façade.	cater for new development. The SPD refers to private amenity sapce (Desgin Principle D4), and notes that all spaces should comply with London PLan (2021) space standards. this provides space stadnards for private balconies. The guidance within the SPD cannot be overly perscriptive to require planter boxes, as these would be personal choice for future occupiers.	No amendment considered necessary
		Tall buildings should have a recessed or arcaded ground floor to provide shade and shelter from rain and down winds.	The SPD provides guidance to material & detailing through Design Objective D, E and F all provide guidance to ensure a high quality design for new development. Furthermore, Objective F also provides guidance in relation to microclimate matters. The SPD provides guidance on how family sized homes should be addressed within contextually tall and / or tall buildings, as these are	No amendment considered necessary
	Balconies / Housing:	Tall buildings are not conducive to family life and large families. Houses at street level should also be provided in the mix of dwellings to cater for larger families, with gardens and play spaces at ground level.	capable of providing family homes, but do have challenges to ensure they are appropriate for families (Design Principle D4 (Residential amenity)). The GLA Housing Design Standards LPG (2022) also provides guidance on this.	No amendment considered necessary
	Environmental Impacts	Environmental impact studies should always be provided on every scheme, with discussion with the surrounding communities before a design is finalised, rather than presented as a fait accompli.	Relevant supporting studies / documents for developments are set out in the Harrow Planning Application Requirements (PAR) 2020.	No amendment considered necessary
		This needs to be reassessed, since on every scheme, the developer is let off the hook from providing a decent amount of socially rented units, due to it not being 'viable' to do so. Hence most schemes, especially the high density tall buildings become priorities for developers' profits rather than a solution to the terrible housing crisis. There is a crying need for more social and council housing which should be prioritised, instead of developer schemes for the higher income bracket and foreign investors who buy up whole swathes of units, thus making no impact on the shortage of rental	Applications that require an affordable housing contribution must provide in accordance with the development plan. Specifically, the London Plan (2021)sets out the approach to affordable housing. Viability is a key element of planning applications, however is not	
1 1	Viability:	and really affordable homes.	able to be influenced through this SPD.	No amendment considered necessary

	for council housing rather than for sale to developers. The use of car parks attached to rail or underground stations should reconsidered as these cause great inconvenience to the local residents and are there to fulfil a need to prevent cars being driven into town centres. By eliminating parking for commuters, and for tall blocks creates a worse impact on the local environments, which already have restricted parking on most roads. This whole aspect needs a rethink by the planners and the London and local plans. The climate crisis makes it imperative that every scheme should be designed to Passivhaus standards, and should be environmentally	The SPD does not (cannot) set land use for sites. Rather it is focused on ensuring height with the suburban context is appropriate, and the design of such developments are of a high quality. Land use principles are able to be addressed through the local plan review process. The SPD provides guidance on such matters though Design Objective	No amendment considered necessary
Climate Crisis	sustainable, using the latest methods and technology, and examples of schemes that fulfil these standards.	F (Sustainable and climate friendly design). However, there are policies within the wider development that address this matter.	No amendment considered necessary
	i) This was a comprehensive and thorough appraisal of what constitutes a tall building which must relate to its context, scale and character within a street or area, taking onto account its location, the adjoining and surrounding buildings, and the impact on the brand landscape and important views of heritage sites and buildings. One can hardly disagree with the general principles of the document.	Noted	No amendment considered necessary
	ii)) Since each street and location of a proposed building or series of buildings is different, precise formulae for defining what is a tall building must have a degree of flexibility which takes into account the design of the building and the way it fits into its surroundings Assessing the quality of design of a building or its architecture is hugely subjective, and even with the Design Review Panels, many schemes that have been approved in Harrow as the result of this panel have highly questionable results when built, often after strong disapproval by local residents.	The SPD does not set a policy or designation for tall building locations or heights. It does provide a context based approach to any developments where height is proposed, and will enable a flexible approach.	No amendment considered necessary
	iii) Design Review Panels should include some community representatives, as consultation with the community only starts once the DRPs have decided the scheme and it is difficult to alter anything, unless by Planning Committee.	The Design Review Panel is sourced from a pool of urban design professionals, and follows the process used by boroughs across London. The DRP does not decide schemes, instead Panels offer independent, expert advice to improve the quality and design of development. A separate model emerging in London is the 'Community Review Panel', where local residents review development proposals. Harrow Council is exploring how such a Panel could be used for parts of the borough.	No amendment considered necessary
Good design should be in a spatial context, as well in the individual building itself.	<ul> <li>i)) Many examples given in the document of 'good design', even with what is considered 'good detailing', are actually quite sterile and severe pieces of architecture, and usually in rigid blocks that do not seem to enhance the surroundings. While the document gives useful advice to ameliorate the impact of height, like setbacks in the upper storeys, and setting the building back from the pavement line so one isn't dwarfed by a cliff of six storeys, as is often the case in much of the developments in Harrow Town Centre, the design should take into account the kind of public spaces in front of the tall building or buildings. It is very difficult to create a decent square with very high towers, as with many of the schemes in the town centre and in Wealdstone. All brick tall buildings can be very oppressive and there should be a mix of materials and features, and modelling, and also setbacks with terraces and balconies in receding ziggurat form.</li> <li>i) The current trend to create tall buildings on podiums should be avoided,</li> </ul>	Public space and buildings setbacks are addressed in the document's design principles. Well-designed podiums with active frontages can enliven street	No amendment considered necessary
	i) The current trend to create tall buildings on podiums should be avoided, even if there is a green space on the podium for the use of the residents only. These are gated communities which do not create accessible surroundings, and end up as hostile fortresses which do not contribute to community life in an area.	scenes and enhance areas, while poorly designed podiums can be detrimental to areas. Design principles in the SPD provide guidance on how to create public space and active frontage around buildings. But this must also be balanced with a requirement to provide play space for children and to avoid crime and antisocial behaviour.	No amendment considered necessary

	Podiums and Tall buildings .	ii) ) Harrow has had its surfeit of tall buildings, and there should be a mortarium on anything over 6 storeys in general. The accent should be on creating proper linear streets and not a series of blocks of flats	The SPD does not seek (legally unable to) to limit the height of, or identify where tall buildings would be most appropriately located. This will be undertaken as part of the Local Plan review.	No amendment considered necessary
		iii) May schemes with tall buildings seem too enclosed and claustrophobic, and there must be views out between the buildings of the sky and the surrounding landscape.	New development should be design led, and those that are subject to consideration against the SPD will be subject to guidance to assist in achieving a high level of design which will include space around new developments.	No amendment considered necessary
		i) The London Plan gives almost free reign to create any density the developer can pack onto a site. There should be a limit and plot ratio as in the past. One can create high density low-rise schemes as one can see in many local authorities like Camden, Islington, Lambeth and Southwark.	The London Plan (2021) approach to new development is design led, resulting in a move away from the density ratio approach which was utilised in previous versions of the London Plan. The SPD provides the same approach as the London Plan (2021) to ensure general conformity.	No amendment considered necessary
	Podiums and Tall buildings .	ii) One must never forget we are designing for a suburban and not an urban location in Harrow, Barnet and Brent, yet we have housing deserts that look like Canary Wharf and the Citybing constructed all over the place	The remit of the SPD is to ensure new development respects suburban Harrow. The guidance contained within it seeks to ensure that any new development subject to consideration against the SPD, will respect the character of suburban Harrow.	No amendment considered necessary
	Lifetime Homes	I) No mention was made of Lifetime Homes in all designs for housing. These are more difficult in tall buildings, where the ground floor is often taken up with huge cycle stores and refuse chambers and few homes on the ground. Accessibility should be emphasised in general in all housing.	New housing must comply with Part M of the Building Regulations, which ensures all new homes are accessible, which is required also within the wider development plan.	No amendment considered necessary
		iii) All tall buildings should have two staircases, including the lifts. Avoid more Grenfells	Access arrangements are set out within the development plan, specifically in relation to tall buildings. It also includes policy and guidance around fire safety.	No amendment considered necessary
	Car Parking Provision	I) The document says little about car parking provision. This seems to be reduced to practically no or very few cars in schemes, which seems to avoid the fact that many people do not or cannot ride bicycles. Many key workers need cars for their work and should not have to walk miles to get to expensive public transport. Even electric cars need parking spaces, and schemes should return to providing one car for every home, which would include spaces for visitors etc. One cannot make housing inconvenient to use!	The SPD provides guidance to car parking. However, car parking provisions across London are as set out in relevant policy within the London Plan (2021). New development must comply with the policy requirements set out in the development plan.	No amendment considered necessary
it 7		All the principles are sound and I am in agreement with. They are sensible and considered and the examples given are good.	Noted	No amendment considered necessary
		However it is a bit late when some horrible tall buildings have already gone up in Harrow or are in the process of going up. This is true of the Eastman site on the way to Wealdstone and the excessively tall buildings just gone up in Wealdstone.	Tall buildings that are greater than 6 storeys will be subject to consideration of Policy D9 (Tall buildings) of the London Plan (2021). This policy holds greater weight in planning determinations for buildings of such height. This SPD may be a material consideration in such applications going forward.	No amendment considered necessary
		It is already a densely populated area which can't really sustain a mixed economy of independent shops. I doubt that a huge influx of people will change this. Little thought has been given to the services needed to sI hope in future the aims within the document are applied and developers are heid to the principles. Easy to produce a lovely document but the real work for the council officers will be to apply them rigourously, ustain livelihoods and a population living there in terms of GP services which we know are already stretched, schools the same and other local amenities needed.	The SPD is not seeking to facilitate or encourage growth into Harrow. Its primary function is to ensure new development, that would be coming forward in any case, is brought forward in a manner that respects suburban Harrow and is of a high quality design.	No amendment considered necessary

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7 Resident

0 Desident 0			
8 Resident 8	I was born in Stanmore in 1944 and have lived in the London Borough of Harrow for 75 years of my life - in Stanmore, Wealdstone and Kenton.		
	I can remember St John's Road , Lyon Road and St Ann's Road lined by large majestic house with gardens and a single story school. That is whe St John's church stood alone in all its beauty.	1	
	I am appalled by what I see now. The church cowers insignificantly beneath the high rise blocks of flats. They are not set back from the road with gardens but flank the roads.	s	
	Not only Harrow and Wealdstone made ugly by these bland structures but the whole character of the borough has been changed for the worse	The SPD seeks to improve the quality of new development, which has not been available to assist previous developments. It will seek to assist in high quality development which will address the points raised within this response.	No amendment considered necessary
	People are denied light, a view of the sky and air to breath.	The SPD provides guidance to ensure that new development does not result in unacceptable harm to neighbouring light. However, there is no right to a view in planning legislation and the SPD is unable to protect a view.	No amendment considered necessary
	Surely the effect of putting buildings where air used to freely circulate h caused the grounds upon which the Government wants to extend the ULEZ scheme. Vehicle emissions are trapped and extra dwellings mean extra traffic.	The SPD provides guidance regarding air movement and quality, which will assist with air movement. The wider development sets out car parking provision, and seeks to promote a modal shift away from private motor vehicle to more sustainable modes of transport.	No amendment considered necessary
N 9 Resident 9	We are dismayed by the growing number of high rise buildings in Harrow and the resultant densification of the population.	v Noted. The SPD is only applicable to new builds coming forward.	No amendment considered necessary
	Harrow is a low rise residential suburb and high rise speculative housing developments have no place. Jobs and industry need to be relocated throughout Britain.	The SPD seeks to ensure that new development respects the character of suburban Harrow. However, it is only able to address Harrow related growth, and is unable to direct jobs and industry out of Harrow.	No amendment considered necessary
	The more flats being built in Harrow, the more people will move into the area and the upward spiral of densification will continue, degrading the quality of life in the Borough.	Harrow is required to deliver housing in accordance with the housing targets set out in the London Plan (2021). The SPD is unable to proide a presumption for or against new homes. However, it will seek to improve the quality of new development and assist in improving the quality of the environent for residents and visitors to Harrow.	No amendment considered necessary
10 Resident 10	Please may the balcony's frontage included in the design of residential tall buildings be fitted with opaque glass or some other opaque materia	The SPD cannot be overly prescriptive, however the point of screening the balcony is noted. Whilst opaque glass is one method to achieve this, there are multiple design methods that can assist in achieving this. Guidance on materials is provided within the SPD and the finished appearance of balconies can be considered under this principle.	
11 Resident 11	Alas, this is all too late as Harrow centre has been ruined already but work must be done so that this sort of 'planning' can never go ahead again. Harrow can now be seen from miles away but not in a good way. The view of the church on the hill, one of the most iconic in London, will never be enjoyed by generations to come.	The SPD is unable to address existing development in the borough, however can seek to ensure new development is of a higher quality than what is currently existing in Harrow.	No amendment considered necessary
Consultants		unan what is currently existing in Harrow.	no amenament considered necessary

12	HTA (Behalf of Tide	Harrow & Wealdstone	In line with London Plan Policy D9, LBH should identify locations where		
	Construction)	Opportunity Area	tall buildings may be an appropriate form of development as part of the		
			emerging Local Plan process. At this stage, the SPD should explicitly		
			define the appropriateness of focusing the development of tall buildings		
			within the Opportunity Area, where higher-density proposals will		
			continue to come forward in line with the Development Plan and the objectives of the NPPF. In this regard, the SPD should be amended to	The London Borough of Harrow has committed to the review of its	
			ensure that the full context of the Opportunity Area is clearly defined,	Local Plan, which will, as required by Policy D9 of the London Plan	
			confirming that the SPD will not form a material consideration for	(2021), set out locations and heights within a relevant local plan	
			development proposals coming forward within the area. The SPD should	policy. The SPD is not able to direct growth to certain areas, such as	
			be clear from the outset that the methodology identified within should	the Opportunity Area. However, it recognises that this is an area of	
			not be applied against sites within the Opportunity Area.	change and does not form part of the geographical scope of the SPD.	No amendment considered necessary
			The Harrow Character and Tall Buildings Study (2021) reflects on the		
			importance of taking maximum advantage of Opportunity Area sites,		
			unlocking sites through delivering significant volumes of high-quality,		
			high-density development, including strategic housing growth. This		
			should be reflected in the introductory sections (Sections 1 and 2) of the draft SPD.	The draft SPD is clear that developments within the Opportunity Area	
				are not subject to the SPD. Such developments will be subject to	
				consideration against the Development Plan.	No amendment considered necessary
			It is our understanding that informal GLA feedback on the title of the SPD	The Council consider that the title of the document as a Tall Building	
			has seen the words 'Building Height' added to avoid confusion with the	SPD is a consistent message throughout the consultation phase, and	
			SPD and Policy D9 (Tall Buildings) of the London Plan. In addition, we	the content of the of the SPD is explicitly clear of the scope of the	
			suggest that the title is amended to 'Suburban Tall Buildings SPD' to avoid		
			any future confusion with how this document is read as a material	anlysis realting to local character, and not relevant to proposals that	
			consideration for development proposals in certain parts of the borough.		
2			Furthermore, the preparation of the emerging Harrow Local Plan needs to		
)			recognise the ongoing strategic importance of the Harrow and Wealdstone Opportunity area as a crucial part of the wider spatial	also tall as defined by the London Plan (2021).	
)			framework for London and the opportunity it provides to help ensure the		
			borough continues to meet its increasing housing targets.		
					No proposition of propositions
		Harrow Town Centre	The draft SPD defines Harrow's existing building heights and outlines that		No amendment considered necessary
			the suburban housing typology continues to be one of the principal		
			characteristics, with prevailing heights generally defined between 2-3		
			storeys across the borough. The only noted departure from this range in	The draft SPD sets out general heights of buildings across the entire	
			height is Harrow Town Centre, defined as four storeys. The methodology	borough, which is a table taken from the Harrow Characterisation &	
			in the draft SPD for determining a contextually tall building is equal to or	Tall Building Study (2021). The table is intended to provide a	
			greater than twice that of the prevailing height of an area. It is considered	snapshot of the entire borough, rather than a granular assessment of	
			the use of crude prevailing height figures for a Town Centre location	each of the neighbourhoods / areas of Harrow. The SPD makes it	
			should be reviewed and amended. The Town Centre building heights are generally more varied, with established buildings up to 20 storeys and a	clear that the table is an overview and could not be relied upon on its	
			more nuanced approach should be adopted to establishing surrounding	own to determine context as part of a planning application. The	
			character of a particular development site.	Opportunity Area has for some time now been the focus for new	
				development, and is an area of change. The SPD makes it clear that	
				developments within the Opportunity Area are not subject to consideration against the SPD, rather relying on policies within the	
				wider development plan only.	No amendment considered necessary
			Developments for tall buildings within the Town Centre play an important	· · · · · · · · · ·	
			role in positive place making and progressive growth, ensuring that high-	Agree. However, the SPD is clear that developments within the	
			density development comes forward in highly sustainable locations,	Opportunity Area are not subject to the SPD, rather relying on	
			contributing to the creation of successful streets and public realm	policies within the wider development plan. It is noted that tall	
			enhancements. In addition, it should be noted within the SPD that tall	buildings that meet the Policy D9 London Plan (2021) definition will	
			buildings within the Town Centre can help enhance navigation, acting as a		
			key reference point, highlighting the hierarchy of the location as a commercial centre.	policy. Town Centres outside of the Opportunity Area will be subject	
		1	ICOMMERCIAL CENTRE	to the SPD, and any developments subject to good design principles,	1
				as set out in the SPD.	No amendment considered necessary

			A design-led approach is required when developing suitable densities;		
			emerging guidance should ensure that LBH promotes growth in an		
			inclusive and responsible way, developing at densities often higher than	The SPD provides a design guide for new development, noting that	
				site optimisation is an important design principle. However, this does	
			those in the surrounding area.	not mean site maximisation, and whilst height can be appropriate,	
					No amound want council and a second and
		Tall Duthing Daltas		this must be brought forward in an appropriate manner.	No amendment considered necessary
		Tall Building Policy	London Plan Policy D9 remains the starting point for defining tall	The Council agrees that London Plan Policy D9 is the starting point	
			buildings across London. The policy encourages boroughs to define what	for tall buildings, and that any local definition should not be less than	
			is a 'tall building' for specific locations; however, in doing so, it needs to	this definition. The SPD does not provide a definition or locations for	
			be recognised by LBH that this should not be less than 6 storeys or 18		
			metres when measured from ground to floor level of the uppermost	tall buildings, which will be the role of a new policy through the local	
			storey.	plan review. However, it provides guidance to ensure that new	
				development within the suburbs respects the prevailing pattern of	
				development / character of an outer London borough with a strong	
				Metroland character.	No amendment considered necessary
			Including a minimum height in the definition ensures that incremental		
			densification cannot be unduly constrained. The SPD should clearly define		
			this as a minimum threshold across Harrow for the definition of Tall	Incremental densification is still able to occur within the suburban	
			Buildings. The policy test requires defined tall buildings to take into	context of Harrow. However, the SPD is seeking to ensure that any	
			account the visual, functional, environmental and cumulative impact of	development in suburban Harrow respects the strong character that	
			the development as set out in the criteria for London Plan Policy D9 and	exists. There is more scope for higher developments within the	
				Opportunity Area (where this SPD is not a material consideration),	
			this should be applied in emerging local policy and guidance for the		
			borough.	and also within mixed use areas / other town centres across the	
				Borough.	No amendment considered necessary
		Good Growth	We support the general principles of SPD design objective G (Section		
			3.11) in making the best use of land by following a design-led approach	The CDD seeks to support good growth as sought through the London	
<b></b>			that optimises the capacity of each site, in line with national and regional	The SPD seeks to support good growth as sought through the London	
<u></u>			policy objectives. It is critical that the SPD doesn't impose unnecessary	Plan (2021). The SPD is positively prepared to allow development,	
N			limitations on site delivery, ensuring efficient use of available land within	provided that it would be consistent with the suburban character	
			the borough in line with the NPPF and London Plan.	within which it is located. Officers consider that subject to the	
				proposed amendments, the SPD is in general conformity with the	
				NPPF and London Plan (2021).	No amendment considered necessary
13	Rolfe Judd Planning (On		Our client welcomes the inclusion of this explicit exemption for sites		
	Behalf of Tesco Stores		falling within the Harrow & Wealdstone Opportunity Area.	Noted	None
	Limited)				
			Page 14 of the draft SPD contains a plan illustrating the provailing height	The noted plan (and also table page 15) are extracts from the Harrow	
				The noted plan (and also table page 15) are extracts from the Harrow	
			for each neighborhoods within the Borough, which includes the Harrow	Characterisation & Tall Building Study (2021), which form part of the	
			and Wealdstone Opportunity Area, but does not delineate it in any way.	evidence base for the SPD and also the Local Plan review. The plan	
			We request that this plan is updated to inset and grey out the	shows the general heights of development across the entire	
			Opportunity Area, as well as including a direct reference to paragraph	borough, of which the opportunity area is part of. However, the SPD	
			1.3.12 so that the plan cannot be misinterpreted as applying to the	makes it clear that development within the opportunity area is not	
			Opportunity Area or restricting the height of development within this	subject to consideration against the SPD, rather development in this	
			area in any way.	area would rely soley on the wider development plan.	no amendment considered necessary.
Residents	Association				
14	The Pinner Association	Vision for Height (Question 1)			
			Strongly agree. The height of new buildings should reflect and respect		
			the height of the existing buildings in an area and minimise or eliminate		
			any adverse effect of a tall building on a wider area. Suburban areas and		
			the older "village" parts of the borough should be protected from the		
			detriment to their character that buildings taller than the established		
			building height of an area could cause.	Noted	No amendment considered necessary
I	1	I		Noted	no amenument considered necessary

F			
-	The "prevailing height" (P in the document) for each area in the borough		
	has been assessed in 2023 and is shown in the table on page 13 of the		
	draft document (Note - it would be helpful if this table could be given a		
	title and paragraph heading). This value of P should be should not		
	<b>increase with time</b> – i.e. the P value for each area of the borough is		
		it is considered that setting a height baseline at a particular point in	
		time to cap the height of any future development would be	
	area (whether via planning permission or under GDPR) must not be	inappropriate. Character of all areas do change over time, and the	
		SPD seeks to ensure that development is undertaken in a manner	
	÷ .	that reflects the character of the area at that particular time.	No amendment considered necessary
	Strongly Disagree. As illustrated by the schematic drawings in paragraph		
	2.4.3 of the draft document, a "contextually tall" building of a height 2xP		
	(twice the prevailing height of the existing buildings in an area) would		
	have a significant detrimental impact on the street scene and potentially		
	the amenity of residents in a suburban area. It would be too dominant		
	and change the character of an area. However even a building less than		
	2xP high, for example the part six storey "Trinity Court" development in		
	Pinner Town Centre (P=4 area) which is clearly visible from the Pinner	One building within a set context doesn't set the context for that	
	High Street Conservation Area and from Pinner Memorial Park, can, and	area. Trinity court would be subject to the SPD - more than 6 storeys	
	does, have a severe detrimental effect of the character of the area. Any	would be subject to the London Plan (2021) Policy D9 - also, the SPD	
r	new building proposed to be taller than the existing prevailing height	makes it clear that buildings that are less than the contextually high	
1	(P) of the buildings in that area should be regarded as "contextually	formula can still be found to be unacceptable. A building that would	
1	tall" and be subject to the greater planning scrutiny, design guidance	not constitute a contextually high building does not mean that a	
i	and other requirements in the draft SPD document.	scheme has a presumption in favour	No amendment considered necessary
Four worked context examples			
	A 4		
Ľ.	Agree that these are examples of the types of sites in a suburban setting.	Noted	No amendment considered necessary
		The worked examples provide a visual aid for applicants on how to	
	Are these "worked examples" meant to relate and be read with the next	consider the context in which a scheme may come forward within.	
	chapter: 3. Design Objectives and Principles? The worked examples	These worked examples assist in determining the context of an area,	
	diagrams give examples of the various types of area and context for a	and what may be an appropriate height for the area. any scheme	
	site, but there is no indication on whether a "contextually tall" building	that would come forward that is contextually tall in this context, will	
	· · · ·	then need to apply the design guidance in Chapter 3.	No amendment considered necessary
-		then need to apply the design guidance in chapter 5.	No amenument considered necessary
	Re "Suburban Residential Context" and "Suburban Mixed Character"		
	areas: Any site adjacent to a residential garden rear amenity space should		
		Relationship with the edge of sites is an important consideration and	
i	adjacent to that boundary. Any site where a "contextually tall" building	the guidance in the SPD sets out how this needs to be addressed.	
· · · · · · · · · · · · · · · · · · ·	could give rise to actual or perceived overlooking of the private rear	Notwithstanding the height of a proposal being acceptable in terms	
1	amenity space or into a residential property should not be considered	of the context of the area, any scheme must also consider all other	
	eviteble te essente dete e "esstevituellu tell" building		No amendment considered necessary
	suitable to accommodate a "contextually tall" building.	guidance within the SPD and also the wider development plan.	No amenument considered necessary
Traffic Light System	· •	guidance within the SPD and also the wider development plan.	
Traffic Light System	Disagree. The "traffic light" flow chart diagram works as a method of		
Traffic Light System	Disagree. The "traffic light" flow chart diagram works as a method of defining which applications should be called as "tall" or "contextually tall"	Agreed. The traffic light system sought to distinguish between a	No amendment considered necessary
Traffic Light System	Disagree. The "traffic light" flow chart diagram works as a method of defining which applications should be called as "tall" or "contextually tall" and therefore required to be subject to additional planning	Agreed. The traffic light system sought to distinguish between a contextually high building and a London Plan tall building. The new	
Traffic Light System	Disagree. The "traffic light" flow chart diagram works as a method of defining which applications should be called as "tall" or "contextually tall" and therefore required to be subject to additional planning considerations and restrictions. However, we consider, as stated above,	Agreed. The traffic light system sought to distinguish between a contextually high building and a London Plan tall building. The new flow chart provides guidance to what would be a contextually high	
Traffic Light System [ c c t t t	Disagree. The "traffic light" flow chart diagram works as a method of defining which applications should be called as "tall" or "contextually tall" and therefore required to be subject to additional planning considerations and restrictions. However, we consider, as stated above, that the "contextually tall" classification should apply to all applications	Agreed. The traffic light system sought to distinguish between a contextually high building and a London Plan tall building. The new flow chart provides guidance to what would be a contextually high building before leading into the design guidance. A tall building as	
Traffic Light System	Disagree. The "traffic light" flow chart diagram works as a method of defining which applications should be called as "tall" or "contextually tall" and therefore required to be subject to additional planning considerations and restrictions. However, we consider, as stated above, that the "contextually tall" classification should apply to all applications for building with a proposed height greater than the existing prevailing	Agreed. The traffic light system sought to distinguish between a contextually high building and a London Plan tall building. The new flow chart provides guidance to what would be a contextually high building before leading into the design guidance. A tall building as per the London Plan (2021) definition does not require inclusion	
Traffic Light System	Disagree. The "traffic light" flow chart diagram works as a method of defining which applications should be called as "tall" or "contextually tall" and therefore required to be subject to additional planning considerations and restrictions. However, we consider, as stated above, that the "contextually tall" classification should apply to all applications for building with a proposed height greater than the existing prevailing height (i.e. >P). (Note: The "traffic lights" name for this flow chart is	Agreed. The traffic light system sought to distinguish between a contextually high building and a London Plan tall building. The new flow chart provides guidance to what would be a contextually high building before leading into the design guidance. A tall building as per the London Plan (2021) definition does not require inclusion within a flow diagram as the definition does not require any	The traffic light diagram (Section 1.4, page 11) has been
Traffic Light System	Disagree. The "traffic light" flow chart diagram works as a method of defining which applications should be called as "tall" or "contextually tall" and therefore required to be subject to additional planning considerations and restrictions. However, we consider, as stated above, that the "contextually tall" classification should apply to all applications for building with a proposed height greater than the existing prevailing	Agreed. The traffic light system sought to distinguish between a contextually high building and a London Plan tall building. The new flow chart provides guidance to what would be a contextually high building before leading into the design guidance. A tall building as per the London Plan (2021) definition does not require inclusion	

			· · · · · · · · · · · · · · · · · · ·
		The Harrow Characterisation & Tall Building Study (2021) noted that	
		developments that are twice the prevailing height are likely to be	
		considered tall (but not to conflict with the London Plan (2021)	
		definition). It is these such developments that the SPD is seeking to	
	The Pinner Association has provided a response to each of the	provide guidance for, to assist in determining if they would be	
	Development Objectives, and in general it can be concluded that there is	appropriate in in their context, and if so then design guidance to	
	agreement with most of the objectives. However, it is noted that	ensure they are of a high quality. To apply such guidance to all	
	Objective B is strongly disagreed with. Specifically, the disagreement is	developments may be overly onerous. Furthermore, developments	
	for the a contextually tall building to be considered as anything higher	that are less than what is considered to be contextually tall, are not	
Development Principles	than the 2023 prevailing height.	automatically considered acceptable.	No amendment considered necessary
SPD will provide certainty &	Strongly disagree. The draft SDP as written does not "seek to provide		
clarity	clarity and certainty for the preparation of planning permissions and / or		
	developments that seek to increase height above the surrounding		
	prevailing heights" as it would not be a consideration unless the	The SPD seeks to provide guidance for proposals that seek to	
	proposed development was a height of at least twice the prevailing	introduce height that the Council consider (and as set out in the	
	height ( $\geq$ 2P). To "provide clarity and certainty for the preparation of	Harrow Charaterisation & Tall Building Study) is more likely to cause	
	planning permissions and / or developments that seek to increase height	harm to the character of a suburban area. The guidance will assist in	
	above the surrounding prevailing heights" the SPD must be applied to all	new development addressing the context of an area and applying	
	developments greater than the existing 2023 prevailing height of an area	design principles to ensure high quality of development.	
	(>P) and this is what should be the basis on which the SPD is applied to	Developments that are considered to below what is a contextually	
	any proposed new development in Harrow borough.	tall building, are not automatically considered to be acceptable.	No amendment considered necessary
CDD will essist in answing that		tal building, are not automatically considered to be acceptable.	
	Disagree. It would be nice to think that all new "contextually tall or tall		
contextually tall or tall buildings			
will achieve exemplary design	practice be difficult to achieve given the examples cited as "good design"	Specific elements of precedents are used to illustrate certain design	
standards?	in the draft document. The design may be more acceptable in many ways	principles. The use of a precedent for one principle does not mean	
	for having to comply with the SPD, but the aesthetic qualities of any	that the development is supported in its entirety. However, officers	
	building is in the eye of the beholder and modern architecture tends to	agree that design is a subjective matter, and the SPD has tried to	
	be in a functional and brutalist style which will not be to everyone's taste	incorporate a range of building types and styles, and to make	
	and be more suited to inner city locations rather than mature	architectural and facade design guidance sufficiently flexible so that	
	"Metroland" suburbs.	it can be applied to contemporary and period architectural styles.	No amendment considered necessary
Any other comments		The Harrow Characterisation & Tall Building Study (2021) noted that	
		developments that are twice the prevailing height are likely to be	
		considered tall (but not to conflict with the London Plan (2021)	
		definition). It is these such developments that the SPD is seeking to	
	The SPD must be applied to all developments greater than the existing	provide guidance for, to assist in determining if such would be	
	2023 prevailing height of an area (>P) and this is what should be the basis		
	on which the SPD is applied to any proposed new development in Harrow		
	borough. Any higher (taller) definition of what may constitute a	overly onerous. Furthermore, developments that are less than what	
	"contextually tall" building would be excessive and cause real harm to the		
	mature suburban areas in the borough.	considered acceptable.	No amendment considered necessary
	······································		
	Paragraph 3.5.12: "Height and massing must be located with regard to		
	the proximity and outlook of neighbouring buildings, minimising harm	The SPD seeks to ensure that a design of a development evolves,	
		, , , , , , , , , , , , , , , , , , ,	
	through loss of light, outlook and overbearing." – this paragraph of	whereby improving the design quality and addressing the potential	
	"Design Principle C4 Orientation and neighbouring sites" implies that	impacts on neighbouring occupiers. Development has the potential	
	Harrow Council considers it acceptable to inflict harm to some extent on	to cause harm to neighbouring occupiers, and it is not always	
	the existing residents of the borough so long as this not to the maximum	possible to ensure no harm from a development. However, with new	
	that the proposed development may have caused harm without design	development often comes benefits, which are weighed in the	
	modifications. New developments should in all cases be designed so as to		No
l	eliminate any harm from "loss of light, outlook and overbearing".	development will warrant a refusal.	No amendment considered necessary

			This draft SPD has been written with a presumption that a "tall" or "contextually tall" building may be a suitable form of development in a mature "Metroland" suburb, a presumption which The Pinner Association would challenge. In our opinion a "tall" or "contextually tall" building should only be considered to be an acceptable form of development in a suburb in exceptional circumstances and all other forms of development should have been considered prior to an over prevailing height building being proposed for a site.	The SPD provides a presumption against tall buildings (as per the London Plan (2021) definition) within suburban Harrow, as these will be greater than six storey's in height. In most instances, given the prevailing low height of buildings within suburban Harrow, these would be harmful to that character. Developments that could be considered contextually tall that are currently received, do not have contemporary and detailed guidance to assist with ensuring appropriate heights and design quality is achieved. The SPD is written so that there is no presumption for or against contextually tall buildings, but with an understanding that there can be appropriate circumstances for such a development.	No amendment considered necessary
	15 Conscious Living				
			Considered reasonable to have buildings of 3 to 4 stories, but should maintain a sense of neighbourliness	The SPD provides guidance on what would be a contextually appropriate building depending on its location within suburban Harrow, and provides guidance to assist in a high quality design.	No amendment considered necessary
			Conscious Living seek to develop schemes with as much green space as possible, a blanket ban on 3 - 4 storey buildings would disappointing and limit ability for food growing.	The SPD provides guidance on ensuring sufficient open space / green space is provided as part of any development, which would also be in accordance with policies within the wider development plan.	No amendment considered necessary
130	16 Transport Trading Limited Properties Limited (TTLP)	Role of SPDs	Parts of the draft SPD are in conflict with the adopted development plan and, furthermore, that the Council's tall building policies, including the definition and locations suitable for tall buildings, should be contained within a development plan document (DPD) (Likely a new Local Plan), which must be subject to full consultation and Examination in Public. Definition of tall buildings and relevant policies cannot be included in a SPD but must be promoted within a draft DPD.	The intent of the SPD is to protect the character of suburban Harrow, it is not the intention of the SPD to determine a height for a tall building or appropriate locations for tall buildings. The Council understands and agrees that this is the function of the Local Plan as set out in Policy D9 of the London Plan (2021). The SPD seeks to provide guidance for developments that are below the tall building definition of the London Plan (2021), to ensure that development is appropriate in suburban contexts across the borough. The SPD does not provide a tall building definition.	No amendment considered necessary
		Definition of Tall Building	The Draft SPD is also fundamentally flawed because its definition of tall buildings includes those which are "contextually tall within suburban locations" (eg. p. 5). This is explained in the 'Defining Context' section of the draft SPD which starts on p. 14. The table on p. 15 is clear that 'contextually' tall buildings include those of only four storeys in many of the borough's neighbourhoods and town centres. The SPD's advice on "defining contextually tall" on p. 18 elaborates that "a proposed building height of two times that of the prevailing height" is a tall building. The requirements of the SoS's Direction, and therefore national planning policy, clearly enable boroughs to define tall buildings but the definition must not be less than six storeys or 18 m and it specifically outlaws the "contextually tall" approach taken in this draft Tall Buildings draft SPD. The Council's approach also fails to conform to the London Plan (which was adopted in accordance with the SoS's Directions). As such, this definition of tall buildings should not be adopted in its current form or in a SPD; references to "contextually tall" buildings should be removed and modest increases in height can be considered in the context of the Council's existing adopted design policies.	The Council disagree with this element of the response given as the SPD is not providing a tall building definition. Officers consider that the SPD is clear that the tall building definition is that which is set out in Policy D9 (Tall buildings) of the London Plan (2021), and the SPD does not seek to provide an alternative definition. The SPD assists developments in understanding the context in which they are located, and what would be considered to be a contextually tall (not London Plan (2021) definition) within that context. The SPD does not prohibit a contextually tall building, rather provides guidance to ensure the height is appropriate, and then the scheme would be of a high quality design.	No amendment considered necessary
		Locations of Tall Buildings	London Plan policy D9 says that boroughs "should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan" (para B, 1). Such locations are required to be identified on maps and within a DPD (not SPD). Notwithstanding, the draft SPD does not say whether there are any locations in the borough that are suitable for tall buildings (the Harrow and Wealdstone (H&W) OA is excluded from the document).	The SPD does not identify any appropriate locations for tall buildings, as this will be a function of the new local plan. This is a requirement of Policy D9 (Tall buildings) of the London Plan (2021). The SPD covers suburban Harrow, and looks to assist developments to ensure that they are of an appropriate height in relation to the context in which they are located.	No amendment considered necessary

	However, a general presumption against tall buildings in the borough is clear, for eg. paragraph 3.3.5 says: "In almost all instances, proposals that meet the definition of a tall building will not respect the character of Harrow's suburban areas. Such proposals will not be supported." This inflexible approach will stifle the delivery of housing (including affordable housing) and other significant benefits. It would restrict the potential	evidence base is clear that the general building heights across suburban Harrow is 2 storeys, with much of suburban Harrow not being located around town centres / trains stations etc. Developments that meet the London Plan (2021) definition which are no less than six storeys (so a height envelope of seven story's) would	No amendment considered necessary
	optimisation of well located, highly accessible development sites such as station car parks which have the potential to deliver substantial public benefits to Harrow Council through the provision of affordable housing and transport improvements, including accessibility and promotion of walking and cycling / active travel. In our view there have to be other centres and locations (in addition to H&W) that could be suitable for buildings of six storeys or more, particularly in sustainable locations adjacent to railway stations such as Stanmore, Rayners Lane and Canons Park. Harrow's own evidence base notes that locations such as train stations could possibly be suitable for tall building	not be consistent with the suburban context. However, in locations that have building form that would be less uniform and / or have greater existing height, a contextually tall building would be taller than that which would be located in a more residential context of two-storeys. Officers are of the opinion that such a tall building (as per the London Plan (2021) definition would be harmful to the character of the area in most circumstances). However, in locations as noted within the response and the Harrow Characterisation & Tall Building Study (2021), there are locations outside of the Harrow & Wealdstone Opportunity Area that may be appropriate for buildings with additional height. In such locations and of an appropriate context, there is flexibility within the SPD to allow for taller buildings. The SPD is not considered to stifle development, rather to ensure what is brought forward respects the character and context of the existing locality within which it is located.	
Defining Context - Prevailing Hei	The summary table on p. 15 of the draft SPD paints a picture that is so general and simplified that it can be misleading. For eg. the prevailing height at Stanmore is given as two storeys, meaning that a four storey building would be a 'contextually' tall building; however, at our Stammore station site, adjacent buildings are considerably higher and up to seven storeys. Similarly at Canons Park the prevailing height of two storeys is misleading close to the station where a high proportion of nearby buildings on Whitchurch Lane and Donnefield Avenue are three storeys. The general characterisation of suburban areas as two or three storeys is a crude generalisation which does not account for areas of greater height and density which are often, but not always, in town centres and locations that are well connected to public transport such as around underground stations. If such characterisation is necessary, it should be more granular, for eg. differentiating between the low density suburban side streets and the higher density locations on main roads, high streets and close to transport hubs where tall buildings may be more appropriate. Policy and guidance should plan for transitional change to a taller context and enable densification and optimisation where it is appropriate and with tall buildings subject to high standards of design.	The Council disagree with this element of the response. The summary table on p.15 is a summary of the height of the built form across all of Harrow. Paragraph 2.2.4 explicitly notes that the table is to provide a general understanding of prevailing heights across he borough. It then goes onto explain that this cannot be relied upon solely, and that a finer grain analysis must be undertaken. Section 2.5 sets out working examples that provides guidance on how to undertake a finer grain analysis for determining heights within the locality of a development. The Council agrees that there are differing contexts across the borough, but the four working examples are considered to reflect the most prevalent character / context settings, and are not intended to provide an exhaustive list of working examples.	No amendment considered necessary
Benefits of Tall Buildings	A few of the benefits of tall buildings are referred to briefly in the draft SPD, but read as an adjunct in a document which stifles height, growth and change. The SPD also does not consider the visual benefits that taller, high quality and beautifully designed buildings can make to the skyline.	The proposed SPD is a design guide to ensure contextually tall buildings are brought forward appropriate to their location. The Council acknowledge that contextually tall and tall buildings have benefits, which will be demonstrated through any planning application. It is not the function of the SPD to list all benefits to a tall building, with taller buildings (specifically those that meet the definition of the a tall building as per Policy D9 of the London Plan (2021)), will need to meet the comprehensive deign guidance set out within that policy	No amendment considered necessary

Positive Design Guidance	We consider that a guidance document such as this would benefit from	The SPD notes that contextually tall and tall buildings can have	No amendment considered necessary
	providing some positive guidance on how high quality architectural	positive impacts. However, this SPD seeks to ensure that the	
	design of tall buildings can positively respect, or even better improve, the	suburban character of Harrow is protected, which as demonstrated	
	character of Metroland.	as being generally low-rise as set out in the Harrow Characterisation	
		& Tall Building Study (2021). The forthcoming Local Plan review will	
		seek to identify appropriate areas for tall buildings across the	
		borough, whilst the SPD will focus on contextually tall buildings and	
		securing a high quality design.	

Rep No:	Representor	Section	Summary of Comments	Councils Response	Amended Text
1	Greater London Authority	Approach to incorporation of the LP2021 minimum tall buildings definition	Policy D9 of the London Plan 2021 defines tall buildings as tall if they are; 'less than 6 storeys or 18m measured from ground to the floor level of the uppermost story'. As 18m relates to the floor level of the up-most storey, this effectively provides a minimum tall building height of 21m (assuming an average floor to ceiling height of 3.0m for the top storey). The proposed SPD does not refer to the overall building envelope that could be 21m. All references to the LP2021 minimum tall building definition should be updated and clarified in line with the recommendations.		The amended text would be across the SPD to ensure clarity and accuracy with the London Plan (2021) definition: 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey
			Need to insert height in floors and meters from ground level to the top of the building , as this provides a high degree of clarity and is therefore enforceable.	The LPA agree that height should be shown in floors and meters from ground level.	Across the SPD height would be referred to in floors and meters: 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey
		Introduction of new tall buildings definition via SPD	One of the aims of the draft SPD is to create and apply a new definition for what constitutes a tall building in the borough based on a figure of twice the existing prevailing height of an area ('Contextually Tall'). These are set on page 15 alongside the LP2021 minimum definition. Removing the terminology 'contextually tall' would avoid many of the issues raised.	The Council have sought to replace the term with Contextually High Building which seeks to remove any potential confusion or conflict with Policy D9 (Tall buildings) of the London Plan (2021), whilst still ensuring that proposals must respect the context in which they are sought to be located within.	Contextually high building
133		Title of the document	the title of the document title should be amended to remove reference to tall buildings. This avoids a misleading and confusing message about the purpose and function of the document.	The Council consider that the title of the document as a Tall Building SPD is a consistent message throughout the consultation phase, and the content of the of the SPD is explicitly clear of the scope of the guidance. It is clear that the first two chapters relate to a contextual anlysis realting to local character, and not relevant to proposals that would meet the London Plan definition. The third chapter relates to design guidance for all proposals that would be contextually high and also tall as defined by the London Plan (2021).	No amendment considered necessary
2	Transport for London (TFL) (Spatial Planning)	Design Principle C1 - Sustainable Locations	We welcome the reference to proximity to public transport as a locational factor. This should include considerations of access, capacity and connectivity by active travel and public transport.	Noted	No amendment considered necessary
		Design Principle D5 – Transport and Parking	We suggest that the second sentence of 3.7.19 is amended and expanded as follows: Developments that result in a higher yield of activity should be located in areas with good access to public transport links-public transport access, capacity and connectivity. Contributions towards active travel or public transport infrastructure or services may be required where there is a need to further improve access, capacity or connectivity to support the proposed development.	Officers consider that financial contributions for schemes can be secured through the Community Infrastructure Levy. However, where any form of specific contribution is required, this can be secured through the relevant London Poan Policy and the Harrow Obligations & Affordable Housing SPD (2013).	Para 3.7.19: Developments that result in a higher yield of activity should be located in areas with good access to public transport links public transport access, capacity and connectivity.

We welcome confirmation in 3.7.20 that London Plan parking standards will apply. However, to ensure consistency with the London Plan, car free development should be encouraged. Sites suitable for tall buildings are likely to be in areas of good public transport connectivity. It is misleading to refer to general car parking requirements and so we suggest that the wording is amended as follows: The quantum of car parking required, including any disabled parking, electric vehicle charging spaces and motorcycle and cycle spaces is set out in the London Plan (2021). Car free	Agree. See Below Agree. Consistency with the wider development plan will ensure a more accurate and robust document, so messaging in terms of parking should be amended.	See Below Para 3.7.20: Car free development is encourage in well-connected locations. In all cases Londor Plan (2021) parking standards will apply
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.		including requirements for disabled persons' parking, electric vehicle charging spaces and cycle parking.
We welcome confirmation in 3.7.21 that dedicated servicing should be provided off the highway where possible. We also welcome conformation in 3.7.22 that any vehicle access should not prejudice pedestrian safety. It may also be useful to add 'or personal security' because servicing or parking areas particularly when they are located in an under croft or basement may present a hostile environment.		Para 3.7.22: Where a basement, under croft parking or service yard are proposed, these sh not prejudice pedestrian safety or personal security. Controlled access to these elements development should be provided to prevent unauthorised access and antisocial behaviour, particular during night-time hours.
We welcome guidance on cycle parking design in 3.7.23 and 3.7.24 although it may be better to refer directly to London Cycling Design Standards (Chapter 8) for more comprehensive guidance.	Agree: Text can reference the London guidance.	Para 3.7.24: Cycle stores which are directly accessed from the street are unlikely to be supported as such stores have a higher risk of trespassing and are less convenient for users. more guidance please refer to London Cycling Design Standards (Chapter 8) or any supersed guidance; https://content.tfl.gov.uk/lcds- chapter8-cycleparking.pdf
Where proposed tall buildings are adjacent to transport infrastructure there is a need to consider how they are constructed and maintained once built to ensure they don't impact on the safe operation of the transport network. This includes such aspects as avoiding oversailing railways during construction or open balconies/windows directly above the tracks, piling impacting on rail infrastructure, ensuring continued access for maintenance of transport infrastructure, and potential impacts due to façade design causing glare or reflecting heat. These potential issues should be referenced in section D5.	Development of all kind adjacent to such infrastructure will require consultation with TfL and any infrastructure operator. This will occur as part of any pre-application or as a consultee for any planning application.	No amendment considered necessary

		Design Principle D10 – Air, Noise and Microclimate	In 3.7.45 it would be helpful to extend consideration of microclimate to include the potential effects on the wider public realm and walking and cycling routes	Inclusion of the wider public realm and walking and cycling routes will ensure a better quality environment adjacent to a contextually tall building.	Para 3.7.45: Microclimate: Proposal 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	TfL Infrastructure Protection		We have no comments to make at this stage except that London Underground Infrastructure Protection needs to be consulted as Statutory Consultees on any planning application within London Underground zone of interest as per TOWN AND COUNTRY PLANNING, ENGLAND-The Town and Country Planning (Development Management Procedure) (England) Order 2015 issued on 16th April 2015.	Noted.	No amendment considered necessary
135			Also, where there are intended works in the Highway, we would need to be notified of these so that we can ensure there is no damage to them.	Noted.	No amendment considered necessary
	Environment Agency	SEA Biodiversity - Design Principle F6	Agree with SEA Harrow Council Screening Opinion Biodiversity Net Gain will come into effect from November 2023 and therefore we would recommend the strengthening of this design guidance from 'expected' to 'should be provided' as it will be a requirement for all developments in the Town and Country Planning Act 1990, unless exempt. In addition, we would like to see that proposals detrimental to locally important biodiversity, are refused. We agree that proposals should enhance and increase biodiversity in line with the Harrow Biodiversity Action Plan. There are also opportunities to improve habitat connectivity and create wildlife corridors across the Harrow area utilising open spaces and green grid (Harrow Core Policy 1 - CS1 Point F).	Noted. Officers consider that the text can be amended to accommodate the text suggested to strengthen the requirements to deliver biodiversity net gain. However, officers consider that the current text allows proposals that are detrimental to locally important biodiversity will be resisted (Para 3.3.19)	No amendment considered necessary Para 3.9.16: Proposals should provide biodiversity net gain. Design solutions include habitat or nesting space and biodiverse roofs, as well as other measures.
			We would expect to see guidance stating all tall buildings be set back from any main rivers to prevent prolonged overshading and the associated detrimental impact on biodiversity.	Harrow does not have any waterways located within proximity designated tall building areas. However, Design Principle F6 (Biodiversity) does set out that prolonged shading (among other matters) can have an impact on biodiversity (regardless of water or land).	No amendment considered necessary
			The SPD is a good opportunity to provide detail on how development can contribute to the objectives and requirements of the Water Framework Directive (EU3: Water) and to ensure a Biodiversity Net Gain through the planning process.	The SPD sets out guidance on biodiversity, and the local plan review is likely to address Biodiveristy Net Gain. Matters in relation to water are picked up in the wider development plan, and where appicable through the local plan review.	No amendment considered necessary

		Green Infrastructure - Design Principle D11	We are pleased to see that Design Principle D11 states all major applications must meet Urban Greening Factor requirements as set out in Policy G5 (Urban Greening) of the London Plan (2021).	Noted	No amendment considered necessary
			We recommend consideration is given to Natural England's Green Infrastructure Framework, guidance which was recently published in response to the commitment made in the Government's 25 Year Environment Plan. It provides principles for good GI and guidance on national standards on GI quantity and quality, as well as a Green Infrastructure Planning and Design Guide containing evidence-based advice on how to design for good GI.	Officers consider it appropriate to provide a link to the Natural England Green Infrastructure Framework for applicants to review as part of an application.	Add to Para 3.7.50: 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/G reenInfrastructure/Home.aspx
136		Lighting	Exposure to artificial light at night has the potential to have a negative impact on a wide range of wildlife, from birds, bats, and fish to plant life, insects and other flora and fauna. Particular importance should be given to avoiding the lighting of water habitats in relation to bats and fish and the mitigation of light spill from tall, highly glazed buildings. New developments should prevent light intrusion into green areas/ corridors through detailed design. All lighting next to rivers should avoid excessive illumination and any spillage into the water which could have detrimental impacts on biodiversity including bird, bat and fish populations and other river species. Additionally, all lighting should closely observe and not interfere with established bat corridors.	Noted. Para 3.9.15 notes that excessive lighting can impact biodiversity. Applications adjacent to open spaces and statutory designated sites specifically, will need to be submitted with supporting information to demonstrate light would not harm biodiversity.	No amendment considered necessary
5	Historic England	SEA General Comment	Agree with SEA Harrow Council Screening Opinion Some text appears to be written focused more on a future local plan than supporting implementation of existing policy. There are risks to this approach, as the weight of "musts" and "should" in the SPD may be challenged by other parties if they are considered to over-reach what is in adopted policy.	Noted Noted. The Council has drafted the SPD to support the existing local plan. However, it is noted that the local plan is currently under review, and as part of a new local plan, a specific policy on tall buildings will be developed. Policy D9 (Tall buildings) of the London Plan (2021) sets out the requirements for boroughs in relation to tall buildings.	No amendment considered necessary
			It is noted that the Core Strategy defines tall (>30m) in a footnote, which is not mentioned in the SPD.	This is correct. however, the definition only relates to the sub area within the Core Strategy, and is not a definition that covers the entire borough. The SPD is proposed to cover suburban Harrow, and not the Harrow & Wealdstone Opportunity Area, therefore the definition in this area would not apply.	No amendment considered necessary

The importance of heritage and views	While heritage is considered within the SPD, we are	Officers consider that the flow chart notes that	Amend flowchart and contextual considerations
when assessing context	concerned that it receives only a fleeting reference in the section on <u>context</u> . We appreciate that the text here is intentionally short, with the approach unpacked through the design principles. Nonetheless, we regard heritage as fundamental when considering context. Additionally, noting also that the Council has an adopted set of protected views, it is surprising that the flowchart on p16 does not prompt an applicant to answer if the location impacts on the landmark viewing corridor or the setting of a protected view. We believe that both omissions should be rectified. Also, we recommend further consideration of how the flowchart on p16 and the text on establishing context (paras 2.2.4 – 2.2.6) could be more neatly integrated, thereby setting a stronger platform for more detailed design objectives and principles that follow in section 3.	heritage is one of a number of unique factors that contribute to the context of a place. This provides a reference point for further analysis for a development to undertake, including reviewing the planning policy maps, which will provide further information in terms of protected views, conservations areas and other heritage assets. Officers consider that the detail provided within the Design Objective B (Protect built and landscape heritage) and the design principles within this, provide a satisfactory level of guidance for new development. Officers will look to better integrate contextual considerations section with the flowchart.	text (Reformat)
Defining contextually tall	We welcome the work done in the Characterisation and Tall Buildings study to identify prevailing heights across the Borough (also see section C of our letter). That said, we reserve judgement on the Council's approach to defining contextually tall as 2 times the prevailing height fails as it is unclear in policy terms how this will be used. While only a starting point, this approach requires nuance in its application.	or twice the height of the prevailing context. It is not intended to form a new definition of what is a tall	
	Additionally, if taken at face value, the table on p14 indicates that contextually tall is "greater than" the number given (i.e. greater than two times the prevailing height), not "equal to or greater than" as stated later in the document. This should be corrected.	Officers agree that the table on page 14 does not have the correct symbol to demonstrate 'equal to or greater than'. Officer agree to this amendment.	Figure 2B has now been amended to ensure tha it reads as 'equal to or greater than'
Overview of design guidance	We broadly support the structure afforded by the thematic approach and the objectives underlying underneath each theme. Given there are several design principles that help to achieve the objectives, it may be helpful to include a table at some point that gives a summary of this structure.	Officers agree that the inclusion of a diagram setting out the structure would be helpful for the usability of the SPD.	Figure 1A has been included on Page 6 to provi a clear layout and structure of the SPD.
	We include some more specific comments in the appendix. In addition to those comments, we emphasize one detailed point of concern: we are not certain that the text on protected views on p31 accurately reflects the text in the Development Management Policies DPD, and risks summarising the approach to views in a way that could cause confusion in its application. We recommend aligning with the adopted DPD and/or referring to the DPD.	views), highlights the requirement for development to consider the viewing corridors - which are set out in Policy DM3 of the Local Plan (2013). The policy provides sufficient detail on how developments should	No amendment considered necessary
Beauty	We wonder if the Council might consider including suitable reference to beauty in the SPD, supporting alignment with the direction of travel of the NPPF. We do not object to its omission, so mention this simply as an idea for consideration.	Officers note that the term beauty has been introduced by Central Government in planning consultations. However, there does not appear to be a definition for this, or clarity on how this would be measured. Officers consider the terminology in the SPD to be understandable and appropriate.	No amendment considered necessary

Application process and requirements	We recommend adding the need for a statement of heritage significance, prepared early in the design process, to support understanding of the heritage significance of assets that may be impacted by a tall building proposal, and the wider character of the area. This can be expanded as appropriate to inform a more detailed heritage impact assessment or similar (see checklist 2 in our Advice Note on Tall Buildings, 2nd edition, 2022 for further information: https://historicengland.org.uk/images- books/publications/tall-buildings-advice-note-4/).	The supporting documents noted in the application process and requirements section is not intended to be an exhaustive list, rather a list that would be required in most applications for contextually tall buildings. However, applicants are directed at para 4.1.2 to review the Harrow Planning Application Validation Information Requirements (November 2020) for any application requirements.	No amendment considered necessary
Harrow & Wealdstone Opportunity Area	While our concerns regarding policy on tall buildings in the Opportunity Area cannot easily be resolved until a new plan is prepared, in the meantime, might the Harrow and Wealdstone Opportunity Area be added to the map on page 14 in the SPD, and the map be numbered as appropriate, so that this can be referred to as needed?	the SPD. The harrow & Wealdstone Opportunity Area	The map on Page 14 as referred to has been amended to show the Harrow & Wealdstone Opportunity Area (Figure 2A). Inclusion of Figur 1B (Page 7) provides a map to also demonstrate where the SPD is applicable and where it is not.
Harrow Characteristic and Tall Building Study	We welcome work done to characterise the Borough and inform the Council's approach to tall buildings. The study includes some interesting and useful content, especially its data on prevailing building heights across the Borough and has a structure that offers the potential for a helpful degree of granularity. That said, generally, the study's coverage of the historic environment is disappointing.	The Harrow Characterisation & Tall Building Study (2021) is an evidence base piece of work that has been completed, and it not in a position to be revised at this stage. It does not form part of the SPD, rather assists in informing its drafting. The prevailing heights table has been incorporated in the SPD.	None.
(Page 6) Status	Suggested changes The Council intends to <del>further implement</del> integrate this guidance into a future Local Plan, giving it even greater	-	Para 1.2.1: The Council intends to integrate this guidance into a future Local Plan, giving it even
	weight as part of the borough's development plan.		greater weight as part of the borough's development plan.
(Page 9) Heading	Harrow <del>-Local <u>Development</u> Plan</del>	Officers note that the heading is seeking to clarify the local planning documents, not the wider development plan which includes the London Plan (2021). This is also clarified in the planning policy hierarchy table on page 7.	No amendment considered necessary
(Page 10) 1.3.20	We welcome reference to our Advice Note on Tall Buildings; however, the quotation given in para 1.3.20 is from the first edition, which has been superseded. A second edition was published in 2022 and is available for download here.		Para 1.3.20: Part 2 notes that the importance or 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.
Page 26	Might it be possible and useful to add the map of Metroland within the Borough at this point?	Officers agree that setting out spatially where the scope of the SPD applies would be helpful for users of the SPD.	Inclusion of Figure 1B (Page 7) provides a map demonstrate where the SPD is applicable and where it is not.
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Page 28	Proposed height must respond <del>contextually sensitively</del> to existing (and consented) prevailing height across suburbia. What level of height is contextually appropriate will depend on an assessment of prevailing heights and the character and built grain of an area <u>(as outlined in section</u> <u>2 above)</u> .	the SPD is a context based document and sets out how new development must respond to its context across suburban Harrow. Officers consider the term to be appropriate	No amendment considered necessary
Page 29 -	We suggest the addition of a short paragraph on the Borough's archaeological remains, informed by liaison with the Council's archaeological adviser, noting that built heritage and archaeological remains are not mutually exclusive e.g. Headstone Manor.		No amendment considered necessary
Page 29 (Picture caption)	Harrow features a diverse heritage landscape, with assets spread throughout the borough, from Conservation Areas to individual buildings and <u>registered listed</u> parks. Harrow- on-the-Hill <u>includes a significant number of is a unique</u> <del>repository of significant</del> period buildings and commanding views to St Mary's Harrow on the Hill form a vital part of the borough's overall character.	clarity to the picture caption.	Picture Caption; Page 29: 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.
page 30 - Design principle B1	3.4.3 Tall or contextually tall buildings 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 Area <del>s SPDs and Management Appraisals</del> , <u>Management Plans and Design Guides</u> . This includes Designated and non-designated heritage assets need to be considered, including:	Officers agree that to insert the suggested term in relation to harming the significance of heritage assets. However, the relevant documents listed are consistent with the document titles that are published on the Harrow Council website. Officers therefore consider retaining these as listed.	Para 3.4.3: Tall or contextually tall buildings 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 Area <del>s SPDs and Management Appraisals</del> , <u>Management Plans and Design Guides</u> . This includes 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		Scheduled Monuments
	<ul> <li>Historic Parks and Gardens (Registered Parks and</li> </ul>		<ul> <li>Historic Parks and Gardens (Registered Parks</li> </ul>
	Gardens and locally listed parks)		and Gardens and locally listed parks)
	3.4.4 When tall and contextually tall buildings are located in close proximity to heritage assets <u>and/or may impact on</u> <u>their significance and appreciation</u> , a highly sensitive approach to height, building form and material use must be followed-to ensure any new development complements heritage assets and does not detract from their heritage- value.	Officer consider that the draft text sufficiently addresses the approach to considering impacts on heritage assets from new development.	No amendment considered necessary

		Page 30 (Picture Caption)	heritage assets. New housing at Bentley Priory sensitively responds to addresses 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 <u>designated</u> heritage assets.	Officers agree with the amended text.	Page 30 (Picture Captions): 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.
		Page 32 (Picture Caption)	Harrow's heritage is not limited to buildings or structures. Canons Park is a Grade-II <u>registered</u> <del>listed</del> -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. New contextually tall buildings must allow for the preservation of such landscapes and amenity and must not impede or compromise the open quality and amenity of such spaces.	Officers agree with the amended text.	Page 32 (Picture Caption): 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. New contextually tall buildings must allow for the preservation of such landscapes and amenity and must not impede or compromise the open quality and amenity of such spaces.
		Page 41 Public Realm	guidance on the public realm, which is available for	Officers agree that including a link to the Historic England guidance for public realm would be beneficial for applicants.	Para 3.7.11: The Design and Access statement must be supported by a robust, illustrated landscape strategy including management and maintenance proposals to ensure that the development is established and maintained in accordance with the above design objectives. For further information refer to Historic England public realm guidance; https://historicengland.org.uk/images- books/publications/streets-for-all/
		Page 54 - Design principle E4	when considering roofscapes	Any increase in height would to a building within the protected view corridors will need to consider impacts on these. However, officers do not object to a cross- reference to aid clarity.	Para 3.8.28 (end of); - Enlargements to roofscapes should consider impacts set out in Design Principle B2 (Development responds sensitively to protected views).
6	Natural England	SEA	No comments to make on the SEA	Noted	
		Overall SPD Comment	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.	Noted	No amendment considered necessary
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Question	Theme	Summary of Comments	Councils Response	Amended Text
Question 1:T	he design guidance is separated int			
	Design	what is considered a high-quality design? this is not very clear and again " socially and economically" inclusive on what percentage?100%? this is not very clear.	The SPD sets out design guidance which follows best practice principles, which when applied should ensure that new development is of a high quality design.	No amendment considered necessary
		It sounds ideal, but the terms "right location" and "high quality" are subjective .	The SPD provides guidance on these matters, and is unable to provide definitive locations as this must be done through the local plan review. High quality design is subjective, however the SPD seeks to provide guidance based on best practice, and ensure that scrutiny from professionals is part of the decision making process (use of Design Review Panel etc).	No amendment considered necessary
		Produces designs in keeping with locality	The SPD sets out guidance on how to understand the context of an area where a new development is being proposed. As part of that assessment, an understanding of the design queues in the area must be understood, with new development respecting these. This will assist with new development respecting the locality in which they are located.	No amendment considered necessary
_141		Stop building high buildings in inappropriate locations blocking historic views from Harrow to Harrow Weald	The SPD includes guidance on understanding appropriate locations in relation to impacts on heritage assets (Page 18), and then a specific objective (Objective B) and principles (B1 (Responding to heritage assets), B2 (Protected Views), and B3 (Historic landscapes & open space)) for applications to be considered against.	No amendment considered necessary
		The thing I notice on all new builds is the exteriors become dirty and marked quickly, so they look great at the start and quickly deteriorate into scruffy looking buildings. EG walls get marked from extraction from clothes dryers. Should be some onus on the developer to deal with this matter so the buildings stay well designed and of good appearance.	Noted. The SPD provides guidance (Principle E3 (Materials & detailing)) which seeks to ensure high quality materials are used in new development whereby hard wearing materials should be used to ensure developments retain a high quality appearance.	No amendment considered necessary
		The theory is ok but the implementation isn't. The new buildings shown as being 'sensitive' new development e.g. page 27, are too high against the surrounding buildings and are ugly in style.	The SPD provides guidance as to height in relation to its context and also design principles. The precedents used are to demonstrate what has successfully worked elsewhere. They are not used with the intention that they are replicated across Harrow, as new development would have to respond to the context within which it would be located.	No amendment considered necessary
		How much say will the council have over architecture? Developers have adopted a copy and paste attitude to architecture. All the new buildings in Harrow look exactly the same. What is the Council doing to promote better architecture such as, The Rye by Tikari Works or Ordnance Road in Enfield by Peter Barber Architects mentioned in the SPD as examples of good architecture?	The Council is the decision taker for planning applications, and the acceptability of the design of a scheme is a material consideration in the determination of an application. The SPD will provide further tools for the Council to consider applications against, and where they do not meet the guidance set out in the SPD (and wider development plan), the Council is able to refuse an application. Buildings that lack architectural merit as noted will be able to be resisted.	No amendment considered necessary

	Good Growth is a good concept, but the only good growth developers want is that of their profits. What tools do the council have to promote Good growth?	Good growth is sought through the policy framework (within the London Plan (2021) and also though this SPD), and as such applications will need to demonstrate how developments contribute to this.	No amendment considered necessary
	This guidance is far too permissive and supports inappropriate development. As an example, Trinity Court in Pinner is cited as a success when the reality for Pinner residents such as me is that it is an overbearing and ugly monstrosity which is out of character with the neighbouring buildings and should never have been allowed to be developed so high. To cite this as a positive example is an affront to residents and shows how inappropriate this current draft guidance is.		Precedent examples have been revised throughout the document.
	Quality of living in areas very close to busy roads needs to be rigorously applied	A superal	
	I do not agree with your definition of high quality design. The examples you give are mostly unattractive eyesores.	Agreed. The intent of the precedent is to demonstrate a successful element of the scheme in relation to a specific principle. However, officers have sought to revise the precedents to provide exemplary quality to better reflect the intent of the design principles. Officers do acknowledge that design is subjective, however have sought to base the precedents and guidance eon best practice.	No amendment considered necessary No amendment considered necessary
142	Your definitions of "right location" "high quality" are highly questionable . And this consultation is very carefully designed to achieve the answers the council wants !	The guidance set out in the SPD seeks to assist in determining where buildings would be able to be brought forward and respect the context within which they would be located. The consultation is intended to gauge the feedback from residents and stakeholders, where all responses are valuable to assisting in making the SPD a more robust document.	No amendment considered necessary
	The problem is that 'high-quality design' in terms of architecture is subjective. Looking at some of the examples I find them ugly. Who decides what is 'high quality', the planners or the residents who have to live with the design once the developers have cut back on the finishes. Trinity Court is particularly bad, as the King once said of a building in the city, it is a carbuncle.		Precedent examples have been revised throughout the document.
	Need to balance architectural progress in new designs with sympathetic development in suburban areas. Slavish imitation of the style of the house next door can be equally detrimental to the area. Eg. Just because red bricks were used in a few of the houses nearby, a development fascia completely made of red bricks is going to be dark and oppressive. Nobody wants that.	Agree. The SPD provides guidance to ensure that existing design queues within the context of new development is respected. This does not necessarily mean replicated these, but ensuring that new development is not at complete odds with such characteristics and features.	No amendment considered necassary
	Frankly speaking, taller buildings of 4 stories will struggle to blend in architecturally. A 4 story building simply cannot be made to look like a 2 story brick house without having a whiff of industrial / factory look at it. No window dressing of "modern" or "contemporary" look can take away from that. E.g. if we look at the blocks on the old Kodak factory, it is a right mix of different styles with the latest construction near the Crown Court or at the back of existing ones being awful to look at		No amendment considered necessary
	I fail to see any high quality or innovative design, only a bare minimum to meet building regulations.	Building regulation provides legislation for certain aspects of build quality, and will influence the design of a building along with minimum standards. However, the SPD provides a range of guidance that goes beyond the minimum standards set out in Building Regulations.	No amendment considered necessary

	Environment	Need to take into account social and environmental impact on local residents properties and valuations	The guidance within the SPD seeks to ensure that the environmental impact of developments would not be harmful to existing or future residents, which would also be sought through policies within the wider development plan. Property values of existing residential properties are unable to be considered, as they are not able to be considered within planning law.	No amendment considered necessary
		To many buildings to much dust to much noise	Guidance set out in Design Principle D10 (Air, noise and microclimate) assist with addressing dust and noise from developments. Developments would also require to accord with relevant policies within the development plan.	No amendment considered necessary
14		Need green space's development	The SPD through Design Principles D3 (Public Realm), D4 (Residential Amenity) and D11 (Greening) set out guidance to ensure that new development provides sufficient green space and amenity space within a development.	No amendment considered necessary
		Make the best environmentally friendly	The SPD seeks to ensure that all new development subject to consideration against the guidance will be environmentally friendly within the remit of the legislation.	No amendment considered necessary
		The approach does not allow for the creation of new green spaces or the retention of the green spaces that already exist. There is simply too much development in Harrow of apartment and office blocks, and your policy enables more and more to be built, which has already eroded the character of the town, and will do so further.	The SPD does not provide a new policy, or a presumption in favour of any new development. Such developments are already occurring, and the SPD will provide further guidance to be a material consideration for such schemes. It will assist in improving the quality of the developments, which would include ensuring green spaces as part of any such development (Design Principle D11 (Greening)).	No amendment considered necessary
		By law, all building projects for housing must have green spaces and trees.	The SPD provide guidance in relation to providing green space (Design Principle D11 (Greening) and also D3 (Public Realm), F6 (Biodiversity) which provide guidance on such matters. Any new application should be in accordance with the development plan, which contains policies on open space and biodiversity.	No amendment considered necessary
		Regarding environmental aspects I could not see any innovation beyond the bare minimum. More people means a bigger carbon footprint	Guidance in Objective F (Sustainable and climate friendly design), Principle F1 (Sustainable construction), F3 (Low embodied carbon materials), F5 (Sustainable energy) sets out zero-carbon should be achieved for major schemes and sustainable construction should be perused. Developments would also be required to be in accordance with the wider development plan, including relevant environmental policies.	No amendment considered necessary
	Housing	We need affordable homes which this does not mention	Design Principle H2 (Tall Buildings assist in Harrow's provision of affordable housing) provides guidance on affordable housing. Applications would also need to accord with the wider development plan which contains specific policies on such matters.	No amendment considered necessary
		There must be some housing for those In key roles, who are not paid a lot to help them stay in the area and support harrows infrastructure e.g. carers, nurses, street cleaners	The SPD provides guidance in relation to developments that would be contextually tall, whilst also providing guidance on the uses and benefits can assist in meeting housing demand. The remit of the SPD is limited on this matter, but new developments must also accord with the wider development plan which contains policies in relation to housing typologies.	No amendment considered necessary

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		As has been pointed out both by HM Government and HM Opposition, there is an urgent need for more housing in Britain. While these design principles are laudable, more needs to be done to make sure that they do not lead to lengthy permitting processes and could be used as excuses to block high quality high density housing within the borough.	the SPD does not provide a presumption for or against development. Rather it seeks to ensure development is located within the right location and respects the context within which it is located.	No amendment considered necessary
	Safety / Mental Health / Social	No. What about making residence happy more tall building mean reduce light, meaning mental health can suffer more.	The intent of the SPD is assist in ensuring new development would create high quality homes and spaces for future occupiers.	No amendment considered necessary
		Location, architecture and encouragement of the right kind of growth are all important but are fairly meaningless if safety cannot be guaranteed	The guidance within the SPD seeks to ensure a high quality of design, which will assist in providing a development that will be safer for both occupiers and those moving around the building / development. Building safety will be ensured through compliance with Building Regulations, for which all new development must comply with.	No amendment considered necessary
	Guidance	Chapter 3 is too long, detailed and boring for anyone outside a planning department or a property lawyer to want to understand its detail. You need to find another way to get the answers you are after.	The guidance seeks to strike a balance between text, images and ensuring an appropriate level of guidance for developments that by their nature, may potentially cause harm to suburban Harrow. The guidance seeks to provide an appropriate level of detail for a range of users of the document, ranging from the public, developers, planning officers and elected members.	No amendment considered necessary
144		It's not definitive enough, being vague leaves them open to a wide range of interpretations.	The SPD is drafted in a manner to not be overly prescriptive. Design led developments are able to achieve a successful scheme through a number of approaches, and design creativity should not be stifled by overly prescriptive guidance. However, it does set a benchmark for what is considered good design, and all new development should at least meet or exceed this.	No amendment considered necessary
		Language is very political and confusing	The language in the SPD must be appropriate for a range of users who may be required to consider the document, from residents, developers, planning officers and elected members. Officers consider that the language strikes the right balance.	No amendment considered necessary
		It appears to be couched as guidance with few, if any, mandatory elements and much of it is highly subjective. I suggest mandatory elements be identified and specified as such.		
		The language used will often have little force, eg at 3.8.6 it reads "Rooftop plant should not be visible and should be appropriately concealed ". The "should" is an ambiguous term and is not necessarily read as a requirement (eg "I should go to the gum" but I probably won't). If the intention is to impose a requirement then better language would be "Rooftop plant must not be visible". If you wanted you could add in something like "Except in exceptional circumstances" but you would then have to give guidance on what is "exceptional" to close an obvious loophole.	Officers consider that the term 'should' is appropriate for this level of guidance, as a building that is contextually tall, is likely to still be at a height that may not enable any required root plant to be completely invisible. Taller buildings are more able to achieve this through their height when viewed from street level. However, contextually tall buildings that cannot locate the roof plant to not be visible, must then it should be appropriately screened. Failure to address either would be unacceptable.	No amendment considered necessary
	Infrastructure	for this in the planning. It also refers to siting near transport hubs, while we have a good system it is heavily overloaded during peak hours, there is no easy	Design Principle HD5 (Transport & Parking) notes that parking must be provided to accord with requirements as set out in the London Plan (2021), which sets parking levels for the borough. The SPD is unable to depart from these or provide new thresholds.	No amendment considered necessary

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		It needs to include civic / community amenities like doctor's surgery, schools, library, leisure centre, etc.	The SPD provide guidance to assist in delivering high quality developments. Any new development would be subject to the Community Infrastructure Levy (CIL), which is funding secured by the Council from developments. CIL funding is utilised by the Council in delivering against civic amenities.	No amendment considered necessary
		Traffic flow needs to be added. The fact that the Catalyst proposal for Rayners Lane carpark was submitted with total disregard to the impact that development would have on High Worple and Alexandra Avenue and the bottle necks it would have created, is a point in case.	Design Principle D5 (Transport & Parking) provides guidance on highways impacts, specifically through paragraph 3.7.19. All developments will be required to accord with the wider development plan policies, with a higher level of detail required for larger density schemes.	No amendment considered necessary
	Other			
		Very much agree. The design of the development at Lady Aylesford Avenue in Stanmore has worked very well and should be a model for its parking, bike paths, nature, mixed size of properties and inclusive village feel. There is no need to keep erecting tall high rise blocks in Harrow. It's become quite distressing to keep seeing this and I have felt the Council had no regard for the feelings of prior residents having this inflicted on them.	The SPD is not setting a presumption in favour of contextually tall building or a tall building, rather it seeks to ensure new development is appropriate to the context in which is located. Design Principle H1 (Tall buildings contribute to Harrow's delivery of high quality new homes) notes that developments should demonstrate a design progression to demonstrate that a lower development height is unable to make more efficient use of a site and deliver the appropriate quantum of housing.	No amendment considered necessary
145		Emphasis should be on build quality. The speed at which some of the existing buildings were completed, I would like to know how long before the interiors start to fall apart. Requires rigorous monitoring and inspection there is no point. You cannot merely leave it to the builders/developers. That's a Grenfell situation.	The SPD focuses on improving the build quality. All developments granted planning permission are permitted subject to approved drawings and conditions, which the development must be built in accordance with those plans. Furthermore, new development is also subject to Building Control legislation which will seek to ensure quality of build. Building Control requires a number of site visits throughout the construction phase to ensure build control / quality. However, this does fall outside of planning legislation.	No amendment considered necessary

Question 2	Theme	Summary of Comments	Councils Response	Amended Text
Question 2				
Question: Do	o you have any further com	nents on the Council's Vision for Height?		
	Vision	The Harrow Tall buildings additional guidelines falls woefully short of the statement in question 2	It is not clear which guidance is considered to have falled short and to which part of the Vision Statement. officers consider that the statement signals the intent of the Council in its approach to height, and the guidance set out seeks to assist in achieving that.	No amendment considered necessary
		So far the vision has been lacking as the amount of development is too much	The Vision set out in the SPD is how the Council wish to see development in suburban Harrow being addressed. The guidance set out in the SPD seeks to assist in delivering against the vision.	
146	Height Restrictions	A range of comments were received in relation to what height restrictions should be imposed, from development being no higher than the existing buildings, up to a height of 12 storeys in Harrow. It is clear from the responses that tower block development is not supported given the impacts such schemes can have on future slums, impacts on the environment, health and access to daylight/sunlight. It is also clear that there does not appear to be a consensus on what height should be considered as tall.	The SPD is not (is unable to) seeking to provide a tall building definition. What constitutes a tall building is as set out in Policy D9 (Tall buildings) of the London Plan (2021). Any alternative tall building definition for Harrow will have to come through the Local Plan review which is currently underway, noting that it cannot be less than that set out in Policy D9 of the London Plan (2021). The Local Plan will introduce a tall building policy that will be in accordance with the requirements as set out in Policy D9, which will identify appropriate locations for tall buildings, and what the height definition (if different to the London Plan definition) would be. The SPD is a design guide which seeks to assist new development within suburban Harrow, to ensure that proposals seeking to add additional height (predominantly for below the London Plan definition of a tall building) to a site is done in a manner that respects the strong character of	No amendment considered necessary
		I've lived in and around Harrow my entire life. I am strongly in favour of taller buildings. London is lagging behind other European cities where taller buildings are commonplace. We're focusing too much on preserving the past rather than making way for the modern day. People need affordable homes. They need variety too. I personally would love to live in a taller building. Houses themselves are also getting quite dated due to space available for modern day appliances. Most houses are now gutted by landlords leaving flats in houses with even less space. The only thing I don't like is some of our tall buildings look very poor when it comes to visual architecture. We can do better than this. It's time to look to the future, not the past.	Noted. Whilst the SPD does not provide a presumption in favour of taller buildings, officers consider that the guidance within it should ensure high quality developments across the borough. Officers consider that the historic character of the borough and its evolution is important in assisting how new development should come forward, even if done with a modern approach or design rationale.	No amendment considered necessary
		Numerous responses across the consultation considered that there would be detrimental impacts on the area if the Tesco redevelopment were to be permitted.	Tall buildings greater than 6 storeys will be required to be considered against Policy D9 (Tall buildings) of the London Plan (2021). At this stage, the redevelopment of the Tesco site on Station Road is not a valid planning application, and as it is located within the Harrow & Wealdstone Opportunity Area, the SPD would not be relevant to its consideration.	No amendment considered necessary

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		There should be a clear presumption against any development above the current height in the area. Also, the policy should operate only by reference to current heights as of 2023 (i.e. any future development of taller buildings shouldn't "move the goal posts" and make it easier to develop more tall buildings.)	The SPD is not able to set policy. However, it will enable consideration of new development against the character of the area at the time an application is submitted. The character of an area will evolve over time, and officers consider that it is not reasonable to set the current heights as not being able to evolve over time as this would result in an overly inflexible planning document. The London Plan (2021) does note that Boroughs should recognise that character will evolve over time.	No amendment considered necessary
		Harrow should not have tall buildings outside the main shopping area around St Annes & amp; St Georges, this was always a suburban borough and attracted families as it was/is nice environment to bring up children away from the clamor of busy overcrowded central London. It has a nice mix of all ages from elderly, young and families. Tall buildings will drive people away.	The SPD is not able (legally) to identify appropriate locations for tall buildings or a new height definition. This will be carried	No amendment considered necessary
	Process	Respect the majority wishes of residents in their postal areas / neighbourhoods and let them make decisions rather than an overall policy		No amendment considered necessary
47	Geographical Scope	Broadly I support, however if it would preclude building such as the developments on near Harrow on the Hill station which are tall then I think it is too rigid.	The SPD would not cover the Harrow & Wealdstone Opportunity Area, and therefore would not have any bearing on developments at Harrow on the Hill Station. Any development within the opportunity area will need to be in general accordance with the development plan.	No amendment considered necessary
	Geographical scope	The present central Harrow through to and including Wealdstone for high rise makes place making sense	The SPD is not seeking to identify any locations appropriate for tall building development, as this falls outside of its remit and what is legally able to do. However, the local plan review will identify appropriate locations across the borough for tall buildings and what height would constitute a tall building. Currently, any schemes within this area are considered against	
		The Marlborough ward in central Harrow is a distinctly suburban ward with a "village feel" in certain roads and mostly character properties, including several school buildings, with some low-rise blocks or flats. The local plan originally said the area between the two town centres (Harrow and Harrow Weald) should not be overdeveloped for good reason. Why then is the monstrous Tesco Towers development on Station Road and Hindes even being considered, and why isn't the council proposing these restrictions to cover that area? Low-rise properties should be lower and the species of the spe	The Harrow Local Plan (2013) is still the policy documents for all of Harrow, including the Harrow & Wealdstone Area Action Plan (2013). Any development coming forward within this area will need to be in general accordance with the policies contained within the local plan (and wider development plan). The SPD does not set any new development parameters for or	No amendment considered necessary

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		You say context and the right location are important when considering placement of tall buildings and your aim is to preserve the character of an area. Surely that should apply everywhere, including the Harrow and Wealdstone Opportunity area. I am not sure what a 'ullage feel' has to do with this. If a building is contextually tall and is detrimental to its surroundings, including robbing surrounding areas of sunlight and daylight, overlooking neighbours and being of overbearing in nature then it should be denied permission in any part of Harrow. Please define what a suburb is? Are you implying that all of the Harrow and Wealdstone Opportunity Area is OK for tall buildings? Aren't there areas in the Opportunity area where tall buildings just wouldn't be right? I agree with the vision as long as it applies to all of Harrow and doesn't have 'all suburbs are equal, but some suburbs are more equal that others' approach	The SPD is proposed to cover suburban Harrow only, which is the entire area of the borough outside of the Harrow & Wealdstone Opportunity Area. Whilst the Opportunity Area is not covered by SPD, this does not mean that there is a presumption in favour of tall buildings within the opportunity area. However, it is noted that an opportunity area (as set out in the London Plan (2021), is an area that is subject to change. Developments proposed within the opportunity area will still be required to be considered against the relevant policies within the wider development plan. Proposals that harm neighbouring amenity through impacts such as daylight/sunlight and also harm to character will be refused. The SPD is not providing any specific locations within any part of the borough that would be appropriate for tall buildings, as this will be don't through the local plan review.	No amendment considered necessary
	Historic Delivery	There are too many high apartment buildings in the centre of Harrow, which has spoilt the character of the town. The high buildings have ruined the views of Harrow on the Hill and the church spire. From a distance, Harrow no longer looks like a green borough on the edge of the Green Belt, and the Hill has begun to resemble an urban development like Wembley or Croydon.	The SPD is not proposed to cover the Harrow & Wealdstone Opportunity Area, and would only be able to be applied to future developments. However, it is noted that within its geographical scope, the SPD does provide design objectives and design principles in relation to heritage assets and	No amendment considered necessary
148		I feel Harrow constructing too many tall building specially Harrow Wealdstone area and on ex-Kodak location it not good for the area and environment.	The SPD is not proposed to cover the Harrow & Wealdstone Opportunity Area, and would only be able to be applied to future developments.	No amendment considered necessary
		Harrow has enough high builds in the centre and surrounding. Any more being built will have a detrimental effect on the quality of residents lives and impacts resources.	The SPD seeks to provide design guidance for new development that is forthcoming, it is unable to prevent development coming forward. However, it seeks to ensure that new development is appropriate for its location and also of a high quality of design.	No amendment considered necessary
		We have to many new blocks of flats building and no parking for residents no roads in good condition everywhere you go is busy !!!we don't need more people coming in Harrow!!!you care just to build to take more money from the council tax payers and that's it!!	The function of the SPD is to assist in new development coming forward, which are already coming forward but without such guidance. It is not the function of the SPD to encourage new development within Harrow. Parking requirements are set by the policies within the London Plan (2021).	No amendment considered necessary
		Harrow is already looking like a concrete jungle with larger family dwellings being squeezed out in favour of building flats which are not in keeping with the existing size and impact of what preceded. Even if not immediately next to these tall buildings houses on Northwick Park Road have no privacy at the rear any longer as these buildings tower over their rear gardens and bedrooms. Quite ridiculous. Harrow isn't a metropolis!	The SPD seeks to provide design guidance for new development that is forthcoming, to ensure they are of a high quality design. The guidance is sets out that a mix of housing is sought to provide housing mix. However, it is unable to specify specific market housing types (neither is the development plan). Guidance within the SPD will assist in ensuring new development provides appropriate relationship to neighbouring sites within a suburban context.	No amendment considered necessary
	Infrastructure	Harrow Council should also consider all other factors beyond character, such as impact to traffic, parking, noise etc.	The SPD provides guidance to ensure a high quality design, which includes ensuring such matters are considered. Furthermore, whilst the SPD would be a material consideration for any relevant schemes, consideration against the wider development plan will also be required and will ensure such matters are addressed.	No amendment considered necessary

	Education and Health Care facilities must be developed in conjunction with increase in population	All new development attracts financial contribution through the Community Infrastructure Levy, which is utilised to fund infrastructure improvements such as education and Health Care facilities (among other elements). In some instances, obligations through a legal agreements can also be secured	No amendment considered necessary
	The Wealdstone community were strongly against the two tower blocks you built near Harrow & amp; Wealdstone Station, but you still went ahead and built them in an highly residential area where the infrastructure and resources were already under strain from congestion of traffic in these narrow roads. Your answer to taking the strain of the traffic from Wealdstone High street is to use Bryon Road in such a way that the cars have to park up on the pavements obstructing pedestrians and then you add these tall residential towers. Wealdstone is suffocating with the continual building of storey flats. These tower blocks are definitely detrimental and are too overbearing and have a negative impact on the character of this area. This just proves that you don't have the vision to put 'height in the right location or of the right quality. So I am totally against any further construction of tower blocks at any height and won't support you in this project. Tower blocks are not suitable places for people to live. There are plenty empty run down house in London which the council should buy up and renovate, it would be a quicker solution than all this chaos you create.		No amendment considered necessary
Design	Most new buildings have been poorly designed and exteriors are SHABBY in a year or two. No credit to the planners & amp; the Committee.	The SPD proposes design objectives and principles that seek to improve on the design quality of what currently exists within Harrow.	No amendment considered necessary
4 Design	HGH agree that sensitive densification is a good approach, but it must be design- led.	Agree. The intent of the SPD is to ensure a high quality of design is achieved, which will ensure the optimal development on a site which will respect the suburban context it would be located within.	No amendment considered necessary
	Not to build ugly, garish coloured buildings	The SPD proposes design objectives and principles that seek to improve on the design quality of what currently exists within Harrow.	No amendment considered necessary
	I am very concerned that the constant building of high rises will block out natural light for residents and does not preserve the character of the area. The many beautiful areas of Harrow with homes and gardens and mature trees are one of the reasons that attracted me to live in Harrow. With this being eroded it makes one wish to leave.	The SPD proposes design objectives and principles that seek to improve on the design quality of what currently exists within Harrow. This will include ensuring any new developments address matters relating to natural daylight / sunlight, privacy, greenspace, microclimate, and character of the area (among other considerations)	
	Building high density housing through tall buildings is incredibly important both to address the housing crisis and to create a vibrant city and borough. We should continue building tall buildings around key transport hubs - e.g., Harrow on the Hill, Harrow & amp; Wealdstone	The SPD does not provide a presumption in favour of tall buildings, or provide appropriate locations or acceptable heights (outside of its legal remit). This will be done through the review of the Local Plan which is currently ongoing.	No amendment considered necessary
	Who or what defines " the right location"? Because even if a tall building cannot be built in an area that have a suburban or village feel it can still be built may be in a car park next to a tube station or supermarket and still be terribly out of place and overwhelming.	The SPD will not provide a right location for a tall building, as this is outside it legal remit. Locations and heights will be set out in the review of the Local Plan, as required by Policy D9 (Tall buildings) of the London Plan (2021).	No amendment considered necessary
	Harrow must be preserved as an area of beauty and keep the openness and green belt areas. This will help environment and make it a more pleasant area to live.	The wider development plan and National Planning Policy Framework (2021) provide a number of policies that protect openness and green belt areas from harmful development.	No amendment considered necessary

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	Housing / Affordable Housing	Tall buildings affect a wide area by their very height, not just the adjacent area's. - Even areas of the borough that are more urban will not benefit from tall building along with their high density. The reputation of all of Harrow as a green and pleasant area to live in will suffer. - The wording of this question is so general it would allow tall buildings in any part of the borough. Harrow has enough housing and more is not needed to be delivered. Much of the housing is not affordable to Harrow residents. The question is about how the council is approaching to address the tall	The SPD does not direct tall buildings within the borough. This will be a function of the new local plan review, which will designate appropriate locations for tall buildings. Tall buildings as defined by Policy D9 of the London Plan (2021) which are those greater than 6 storeys, are unlikely to be acceptable in suburban Harrow. Harrow is required to deliver homes by the London Plan (2021). Specifically, the London Plan requires Harrow to deliver 802 homes per year. The SPD sets out guidance that new development would be required to deliver affordable housing from relevant schemes. However, this will be delivered in accordance with policies within the wider development plan.	No amendment considered necessary No amendment considered necessary No amendment considered necessary
150		buildings in the borough. Harrow borough characteristic must be redefined and take account of the changed Harrow population profiles since the 2011 census that determines the communities expectations and needs. "1930s leafy areas" characteristics of Harrow, described by the planning portfolio-holder, have changed over the time, and the planning policies should reflect this. Census 2021 shows: Between the last two censuses (held in 2011 and 2021), the population of Harrow increased by 9.3%, from just under 239,100 in 2011 to around 261,200 in 2021. In 2021, Harrow was home to around 37.0 people per football pitch-sized piece of land, compared with 33.8 in 2011. Harrow saw England's joint largest percentage-point fall in the proportion of households that owned their home (from 65.3% in 2011 to 58.8% in 2021). In 2021, 45.2% of people in Harrow identified their ethnic group within the "Asian, Asian British or Asian Welsh" category (compared with 42.6% in 2011),	The SPD provides a design guide for new development. The	
	Other	Asian Asian British of Asian weish category (compared with 42.6% in 2011), while 36.5% identified their ethnic group within the "White" category (compared with 42.2% in the previous decade.	Local Plan Review will address the borough profile and spatial strategy.	No amendment considered necessary
		At present it is concrete jungle bad for mind body and soul! We need to see the sky and light! Tall Buildings especially those that are residential have no safe exits if there were fires. However tall building may be required in future to live in a water world when parts of UK land has been predicted to be under water due to climate change. I don't think it is right to restrict height of new building developments. Harrow has excellent transport links to central London, and allowing taller, higher density housing developments near train stations could help reducing the pressure on housing elsewhere in the borough, by allowing those that require nearby transportation live close to a station. This would be a triple win for the borough: it would increase the availability of housing pressures and congestion in areas further away from transport links, and it would boost the council's finances by increasing the council tax intake while requiring comparatively lower service levels. That attention needs to be paid to proposals where developers use heights of neighbouring structures that are not on the same street level. Ie Rayners Lane station was used inappropriately by developer Catalyst as a logic for their multiple story development proposed (and rejected) for Rayners Lane car park.	New development is required to meet the policy requirements of the wider development plan, which includes addressing Fire Safety (as set out in Policy D12 of the London Plan (2021). The SPD provides guidance in relation to access to daylight and sunlight. The SPD does not seek to restrict height of new development, rather to ensure any development where height is proposed is located at the right height to the context in which it is proposed. Tall buildings as per the London Plan (2021) definition, are required to directed to designated areas within the borough via the Local Plan. This is intended to happen as part of the Local Plan review, and is not within the remit of the SPD.	
		Yet the station sits on a hill above the car park and their proposal would have towered over neighbouring two story residential houses. The council should be alert to this.	Agreed. Any change in site level is a material on-site consideration, and will form part of the context of the area.	Insert at Para 2.2.6; 'Site Levels of site / neighbouring sites'

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	Disabled people will have varying views on whether to agree with the need for		
	more homes, or to be against the level of development and the height of the		
	building, and it is only appropriate for HAD to comment in relation to the need	s	
	or rights of disabled residents or users of Harrow.		
	What would make those buildings acceptable to us is if all, or high numbers of		
	the homes are fully accessible, and local services can support any disabled		
	residents. To be fully accessible homes must be fully mobility accessible and		
	there must be guaranteed safe evacuation in event of emergency such as fire.	Developments that propose new housing are required under	
	Disabled people commonly die in fires (including Grenfell) because building	the wider development plan to ensure accessible homes are	
	operators often implement extremely dangerous evacuation procedures such	provided (10%). This is secured by way of policy, and also sets	
	telling disabled people to 'stay put' in the burning building.	out what level of access is required to be provided under the	
		Building Control Act. In terms of fire safety, this is also secured	
	We want to see each part of the building being equipped with two fire	under the wider development plan and will vary in terms of	
	stairways, and for the lifts to be fully fire resistant. All components of course	the height of a development. Where buildings exceed the tall	
	should meet the very highest safety standards possible.	building definition as set out in Policy D9 (Tall buildings) of the	
		London Plan (2021), a greater level of scrutiny and mitigation	
	If the building cannot be made safe and accessible, agreement should not be	is required. Officers consider that the London Plan (2021) sets	
	given to proceed.	out the policy requirements for such matters and is the	
	Brief to brocedi	correct forum for these to be located in.	No amendment considered necessary
		The guidance set out in the SPD is based on best practice,	······································
	Account should be taken of previous experience with high rise blocks and their		
	effects of the social aspects of living. Many people suffered from depression	quality places for people to live and visit. Some of the	
	because of living in high rise accommodation.	precedents used show poor practice, and should not be	
		replicated.	No amendment considered necessary
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' <b>_</b>	5 ,	The SPD is unable to restrict or prevent land use of any type,	
(1)		as it is providing guidance to an existing policy within the	
5	replaced.	development plan.	No amendment considered necessary
	should be never allow and put in convents that now and in future whoever is in	1	
	power cannot be allowed to build anywhere in the borough	Land covenants are outside of planning legislation.	No amendment considered necessary
151	should be never allow and put in convents that now and in future whoever is in	The SPD is unable to restrict or prevent land use of any type, as it is providing guidance to an existing policy within the development plan.	No amendment considered necessary

	Theme	Summary of Comments	Councils Response	Amended Text
Question 3				
Question: Please provide any fu	rther comments on the Co	ouncil's approach to defining a contextually tall buildi	ng.	
			it is recognised that there is a range of views on what a	
			contextually tall building should be in terms of its height	
			in relation to its surrounding context. The approach	
			taken by the Council is what is considered to be a mid-	
			rise development as set out in the Harrow	
			Characterisation & Tall Building Study (2021). In	
			suburban settings with prevailing heights approximately	
			2 storeys in height, a midrise building would constitute	
			between 3.5 and 4 storeys. The SPD does not provide a	
			presumption in favour of such developments, but	
			recognises that at this height in most suburban contexts,	
			harm could be caused to the character of the area.	
			Accordingly, developments that propose this height	
			(and are contextually appropriate) would require a	
		A range of alternative contextually tall definitions have been proposed, ranging from remaining at the same height as	greater level of scrutiny, which is provided by the guidance as set out in the SPD. Developments that are	
		existing buildings, to no higher than the tallest 'older'	below what would be considered contextually tall are	
		building, ranges from 3/4, 1.3 and 1.5 times the prevailing	not presumed to be automatically acceptable, and will	
		height, to anything more than 4 storeys should be defined as	still be considered against relevant policies within the	
		a tall building.		No amendment considered necessary
<u> </u>			Agree. A tall building is defined as both number of	
, СЛ			storeys and metres. The London Plan (2021) this is not	
N			be less than 6 storeys or 18 metres measured from	
			ground to the floor level of the uppermost storey.	
			However, when considering a contextually tall building,	
				Reference to London Plan Tall Building should state not be less
			the context, as such officers consider remaining at equal	than 6 storeys or 18 metres measured from ground to the floor
		Should building heights for tall buildings should be set out in	to or twice the height is more appropriate for building	level of the uppermost storey. No amendment necessary to
		both number of storeys or meters?	less than the London Plan definition.	contextually high definition.
			The character of any area is subject to change (less so	
			for conservation areas), and therefore a gradual	
			increase in height is likely to be inevitable (noting the	
			central government permitted development right for	
		The original height of the local buildings should be the	upwards extensions). The intent of the SPD is to assist in	
		defining factor, not later additions such as loft conversions.	determining an appropriate height for an area, and	
			provides extra consideration for those developments	
			that are more likely to have a potentially harmful impact	
			on the surrounding area. A suburban house with	
			habitable roof space would qualify as a 2.5 storey building.	No amondment considered accessory
			Indiidiilă	No amendment considered necessary

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is balance to block the prevaming height. The glock means       within which they are located, and accord with the guidance as set out in the SPD (and relevant policies within the wider development plan). A SPD is unable to provide policy which would restrict height or land use, such an approach must be undertaken through the local plan review.         Within which they are located, and accord with the guidance as set out in the SPD (and relevant policies within the wider development plan). A SPD is unable to provide policy which would restrict height or land use, such an approach must be undertaken through the local plan review.         No amendment considered necessary		The demittor is too weak. The presumption should be		
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for hospitals where available land would not otherwise permit sufficient capacity for Harrow. The sufficient capacity for		should then give examples of the infitted circumstances in		
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sufficient capacity for Harrow. sufficient capacity for Harrow. plan review. plan review. pesign Principle D4 (Orientation and neighbouring		for hospitals where available land would not otherwise permit	within the wider development plan). A SPD is unable to	
plan review.     No amendment considered necessary       Design Principle D4 (Orientation and neighbouring		sufficient capacity for Harrow.	provide policy which would restrict height or land use,	
Design Principle D4 (Orientation and neighbouring				
				No amendment considered necessary
sites), Design Principle D4 (Residential Amenity), and				
Please also take into account the Light blockage impact on Design Principle D8 (Daylight and overshadowing) all		Plazza also tako into account the Light blockage impact on		
Seek to ensure that new developments do not		nearby residential blocks of flats and impact of additional		
Unacceptably narm light levels to adjoining properties.	СЛ IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII	residents population on local area congestion		
Community intrastructure Levy is secured from new	ω		· · ·	
developments to assist with essential infrastructure that	•-			
will assist in addressing congestion. No amendment considered necessary				No amendment considered necessary
I think other priorities are more important - in the current cost The progression of this guidance is a priority of the				
of living crisis, allowing for high quality, affordable housing administration. The SPD seeks to ensure the right type				
for Harrow residents in tall building next to train stations is of development in the right locations, which will assist		for Harrow residents in tall building next to train stations is	of development in the right locations, which will assist	
		which we are used at these defining "sector to all the fall" building	in delivering the high quality affordable housing for	
much more urgent than defining "contextually tall" building in delivering the high quality, affordable housing for		Infuct more urgent than defining contextually tail building	in delivering the high quality, and dable housing for	

	Theme	Summary of Comments	Councils Response	Amended Text
Question 4				
Question: Please provide any further	commonte o	n the Worked Examples		
Question. Please provide any further				
Worked Examples		Why not just ask the residents "do you want this proposed development built next to your house? And when they answer No respect that answer and reject the planning proposal The examples you provide are completely out of character with neighbouring dwellings.	All planning applications considered against the development plan are required to consult neighbouring properties, where responses from the public are material considerations in the determination of planning application. However, planning decisions must also be taken in accordance with the development plan and the policies contained within it. The worked examples are considered representative of differing character contexts across Harrow, which are designed to assist applicants in understanding the context in which they are proposed to be located within.	No amendment considered necessary
		The worked examples do not seem to indicate what would be permitted on the areas to be developed so how can we comment?	The worked examples seek to provide guidance on how to understand and determine the context that a development is sought to be located in. In understanding the context of an area, will then allow applications to evolve and to optimise a site, whilst respecting the character of the area and the amenity of residents.	No amendment considered necessary
154		The typical suburban contexts cover too small an area - tall buildings dominant wide areas until like shorter buildings which only impact the site they are on, and adjacent buildings	The working examples seek to provide a process to enable an analysis of a site to determine what would be a contextually high building within a context / location. It does not provide a restricted geographical area for considering potential harm, as this could be less or more depending on the site circumstances.	No amendment considered necessary
		Agree as long as it applies to all of Harrow.	The SPD applies to all of suburban Harrow, but does not apply to the Harrow & Wealdstone Opportunity Area. Opportunity Areas are designated areas within the London Plan (2021) where development is directed to, given their sustainable locations and ability to accommodate growth. However, development within an opportunity areas must still accord with the relevant policies within the development plan, which still seek to protect residential amenity and the character of the area - noting that opportunities are subject to change given the growth envisioned for them.	
		We need real examples	The working drawings seek to provide guidance on how to understand and analyse the character context of an area. The theoretical approach is intentionally taken to ensure that the key features are considered and identified within an area.	No amendment considered necessary

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	too much open to interpretation. people in our street typical Metroland already disregard cues and styles in the area and we have several unsuitable unsympathetic extensions. They have often ignored planning permission and when we have let the council planning know we were ignored. If this is to work the planning people need to be more assertive and make everyone stick to the plans.	The SPD provide much more clarity for new development, especially where further height is proposed, as this where potentially more harm is felt on a wider scale. With explicit guidance for new development (not so much for most householder extensions), this allows the Council to ensure that developments are of a high quality design as the guidance, once adopted, provides clarity for developers and officers alike.	No amendment considered necessary
	These were reasonable but I go back to my point about needing to support future generations and find more ways of building more homes. "Metroland" was fields once and we have all benefited from the substantial change the development brought. Seeking now to only conserve is not fair for those coming after us.	The Council understand the need to deliver more new homes, with the development plan geared towards assisting this in the right locations and the right types of homes. The SPD is intended to assist in new development from a character and design perspective, which will assist in high quality developments regardless of use.	No amendment considered necessary
	In my view, lots of weight must be given of all suburban residential context as these are the people living in the borough.	Agreed. The four working examples seek to demonstrate what are the most common typologies across the borough, which can be used as a basis for determining the context a proposal is seeking to be located within. These may require amending for locations that do not fit specifically into one of the examples, and should accurately represent the character of any specific area.	No amendment considered necessary
<u> </u>	The seem well chosen	No further comment	No amendment considered necessary
55	In my opinion these focus too closely on height, at the expense of other measures of density. Some also seem very homogeneous.	The SPD seeks to ensure that height is appropriately addressed in new development that occurs within suburban Harrow. The density of development should be design led, and officers consider that through appropriate design and optimising a site is able to be achieved by applying the guidance within	No amendment considered necessary
	I find these confusing. Are you saying that these are just examples of local Harrow environments (agree with this) or that someone will be able to build e.g. a 7 storey block of flats abutting the back gardens of suburban houses? This purpose should be made clear on the pages.	The working examples seek to provide examples of typical Harrow place types and the contextual factors which would impact attempts to develop sites within these typical places. They are not intended as a guide for how high or contextually high buildings could be created, but simply set out the contextual factors developers must consider in these locations when proposing a development, including thinking about an appropriate height within such a setting.	No amendment considered necessary
	<ol> <li>First example invades into privacy of all residents from their backyard. Sunlight issues as well.</li> <li>It is okay</li> <li>Ok. Noise pollution for the new resident is an issue, but there for all residents of that location anyhow.</li> <li>Not ok. Privacy/sunlight issue for existing residents. It can be developed as single corner building (in line with second worked up example) and few regular height buildings.</li> </ol>		No amendment considered necessary
	Well planned. However in areas such as Harrow town centre or high streets where there are no residential properties within eyeshot, you can build higher. Provided it is not intrusive of residents' land or private areas in the immediate vicinity.	The SPD does not cover Harrow Town Centre. However, other town centres are within its remit, and where appropriate, further height may be appropriate subject to consideration against the design principles within the SPD.	No amendment considered necessary

	The majority of examples make a case for what I'd consider buildings that are too tall. Placing ever so subtly taller buildings into an area will lead to a character like Wembley, which started relatively low density, low height and is now a nightmare or tower blocks	The SPD does allow for extra height where this is considered to be appropriate, through understanding the context of a potential development site, and also applying the design guidance. Buildings proposed to be significantly higher are unlikely to be considered contextually tall, and likely to be considered a tall building as per the definition of Policy D9 (Tall buildings) of the London Plan (2021). Buildings that meet the definition of Policy D9 of the London Plan (2021) are unlikely to be supported in most circumstances within suburban Harrow.	No amendment considered necessary
Other	As long as any new buildings do not take away anything from the local area but add to it.	The guidance set out in the SPD seeks to ensure that new development is of a high quality and would not be harmful to the area within which it would be located.	No amendment considered necessary
156	In the areas closer to Harrow Town Centre most of the dwellings are also houses. So it is not fair to the residents in these areas to have a different policy and allow taller buildings as compared to areas farther away. In fact the more suburban areas could accommodate taller buildings whereas in the closer areas they would increase the feel of a concrete jungle.	Ideations and ability to accommodate growth. However, development within an opportunity areas must still accord with the relevant policies within the development plan, which still seek to protect residential amenity and the character of the area - noting that opportunities are subject to change given the growth envisioned for them. However, the SPD is not introducing a new policy (unable to legally do so) but will assist for taller developments	No amendment considered necessary
	Research the History of Harrow as part of the initial discussion	The Harrow Characterisation & Tall Building Study (2021) is the up to date evidence base that sets out the history of Harrow and how the character has evolved. This study assists in underpinning the drafting of the SPD.	No amendment considered necessary
	I have concerns that in sustainability & environmental issues including the drain on services do not figure as a priority.	The worked examples provide assistance in determining how applications should address the context of the area in which a proposal would be located, rather than development priorities. However, Design Objective F (Sustainable and climate friendly design) contains a number of design principles to address sustainability and environmental guidance.	No amendment considered necessary
	If we never create something new because it must look like the surroundings then our designs will never evolve. I very strongly believe we should be in favour of modern designs rather than latching on to existing ones and forcing new buildings to confirm to those standards.	The SPD seeks to ensure high quality design of new developments, which seeks to support new modern	No amendment considered necessary

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	The Marlborough ward may be in central Harrow but it is distinctly suburban and many roads have a village feel. It is therefore wrong	The SPD scope is the suburban areas of Harrow, and does not cover the area designated within the development plan as the Harrow & Wealdstone Opportunity Area. Opportunity Areas are designated areas within the London Plan (2021) where development is directed to, given their sustainable locations and ability to accommodate growth. However, development within an opportunity areas must still accord with the relevant policies within the development plan, which still seek to protect residential amenity and the character of the area - noting that opportunities are subject to change given the growth envisioned for them.	No amendment considered necessary
	cohesion, continuity and harmony across the borough, but the focus on the 'contexts', based on the suburban or other individual elements, is somewhat divisive and at the odds with the spirit of the Core Strategy!	The SPD is a design based document seeking to assist in high quality design of buildings that are contextually tall within its context. Applying the guidance on a context basis ensures the development responds to location within which it is located, and when applied across suburban Harrow, should ensure the continuity of design across the borough.	No amendment considered necessary
	Important to consult local residence those in the same street and those impacted	Planning applications that are considered against the policies within the development plan are required to be publicised, with neighbouring properties being consulted. Responses from the public are material considerations in the determination of planning applications.	No amendment considered necessary
	Shouldn't build to be equal to the highest nearby structure(s). Can be lower. Don't need to build on every 'spare' piece of land.		No amendment considered necessary
	Matters if homes in mixed areas are going to be the poor relation to leafy areas. No to Tesco Towers	The SPD seek to ensure that new development responds to the context in which it is sought to be located regardless of area. It also seeks to ensure that development is of a high quality, which should assist in improving an area.	No amendment considered necessary
	incrementally cluster tall buildings together (point 3.3.12). And all of the new apartment blocks going up in Harrow do not have any relation to the character of the original Metroland suburban houses and are therefore out of keeping with the look of the borough.	Paragraph 3.3.12 refers to larger sites where more development is able to be achieved, and where height is potentially able to be included. However, this is not a presumption in favour of height, but sets an opportunity as set out in the image at the bottom of page 28.	No amendment considered necessary
	Development should be design-led as there may be cases where taller buildings are appropriate within suburban locations. There is a risk that too many specific guidelines could lead to good opportunities for sensitive optimisation of sites to be missed.	The SPD provides design-led guidance for new development, which also seeks to ensure site optimisation so the efficient use of a site is utilised. Officers consider that it does not limit the opportunities for new development, and where appropriate, height can be a positive response	No amendment considered necessary

	The general intention seems to be to build at a greater height than surrounding buildings. The aim should be the same height.	There is no presumption to increase height. The SPD is being prepared to provide guidance to developments that are already forthcoming in the borough. New development that is not considered to be a contextually tall building as per the guidance, does not automatically result in an acceptable development.	No amendment considered necessary
	All these create an overdevelopment of Harrow's suburban two storey Edwardian and mostly 1930's buildings	The working drawings do not provide any development proposals, rather they set out how any new development must consider the context of the area in which they are proposed to be located within.	No amendment considered necessary
	With the history of flooding in Harrow, I would suggest that impact on flood risk should also be featured.	Flood risk is a matter that is covered within the policies of the wider development plan. Matters such as flood risk must be addressed through relevant policies where flood risk is present.	No amendment considered necessary

Quantian F	Theme	Summary of Comments	Councils Response	Amended Text
Question 5				
Question: Do you	have any further comments		Agree. The guidance is intended to oncure new development would	
		The buildings should reflect the size in the area it's located in, otherwise the character of the area will be ruined.	Agree. The guidance is intended to ensure new development would reflect the character of the existing area.	No amendments considered necessary
		otherwise the character of the area will be runed.	Areas for tall buildings will be designated through the new local plan,	
		If there would more micro-areas pre-designated for tall buildings I	which is the correct forum to do so and as directed by Policy D9 (Tall	
		would support.	buildings) of the London Plan (2021)	No amendments considered necessary
			The SPD is not seeking to create a barrier to development or	
		adds barriers to building affordable homes and creating	affordable homes, rather ensuring that development that is coming	
		appropriate density for the borough	forward is appropriate for its context and also of a high quality	
			design.	No amendments considered necessary
			The SPD seeks to strike a balance by providing guidance for new	
			development, without being overly prescriptive. The SPD provides	
			guidance only and new development must also be developed and	
		It is so vague as to be unusable	accord with policies within the wider development plan.	No amendments considered necessary
			The flow diagram is considered to be clear to follow in relation to	
			when a new development would be a tall building, contextually tall	
		This system may be open to wide interpretation leading to	building or neither, and then what guidance needs to be followed.	
		abuse. I notice that community & amp; environmental	Matters in relation to those listed are contained within the design	
		impacts of such structures do not figure in the flowchart.	principles within the SPD.	No amendments considered necessary
<b>``</b>			It is not clear as to what restrictions the comment does not agree	
(T)			with. However, the height restriction for what is considered to be a	
			tall building (more than 6 storeys) is the definition set out in Policy	
			D9 (Tall buildings) of the London Plan (2021). The SPD is unable to	
			introduce a building height definition, nor one that is less than that within the London Plan (2021). The intent of the guidance set out in	
		It's easy enough to understand but I do not agree with the	the SPD is not to restrict new development, rather to ensure that it is	
		restrictions proposed for tall buildings	appropriate for its location and is of a high quality design.	No amendments considered necessary
			The consultation for the SPD has been undertaken in accordance	No amenuments considered necessary
			with the Harrow Statement of Community Involvement and	
		Needs more consultation	approved by Harrow Cabinet.	No amendments considered necessary
		Not clear what an applicant should provide to satisfy the top two		
		green boxes. You need to specify it.	The traffic light system has been replaced by a flow diagram which is	
		For example, the first box says ' Define prevailing heights within	considered to be more user friendly when developing design	
		context', but nowhere in the document is there a section	proposals for contextually high building. It is simplified by removing	
		specifying what an application must include in order to satisfy that	the Tall Buildings element for proposals that would be defined a tall	
		box.	building as per the London Plan (2021). Furthermore, each step	
		Ditto the second box 'Define contextual conditions'.	required to develop a proposal, is linked to the relevant sections within the SPD.	The traffic light system diagram on page 14 has been replaced with the flow diagram (figure 2L) on page 24.
				· · · · · · · · · · · · · · · · · · ·
			The definition of a tall building (more than 6 storeys) is the definition	
			as set out in Policy D9 of the London Plan (2021), not a locally	
		This is just a basic flow chart. The issue is with the decision points	imposed definition. The SPD notes that in most instances, a	
		especially the definition of contextually tall.	development that meets this definition is unlikely to be supported	
		No buildings of 6 storeys are necessary in this suburban area and	within a suburban context. This is included however as there may be	
		future ones should not be permitted.	instances such a development could be appropriate, but where the	
			definition is met it must follow the policy requirements of Policy D9	
			(Tall buildings). However, in some exceptional circumstances a tall	The traffic light system diagram as page 14 has been under a
			building that meets the London Plan (2021) definition may be	The traffic light system diagram on page 14 has been replaced with the flow diagram (figure 2L) on page 24.
			appropriate.	with the now diagram (ligure 2L) on page 24.

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	green. - This system is too simple to deal with complex developments. A proposal under this system could be given a Yes, but still not be appropriate.	The traffic light system has been replaced with a flow diagram. It is only to determine if a proposed development is, in relation to its context, a contextually high building or not. Regardless of its context, if it is more than six storeys, then it is defined as a tall building as per Policy D9 (Tall buildings) of the London Plan (2021). The flow diagram is not intended to determine the acceptability of a development, rather what level of guidance (if any) needs to considered in relation to a proposal.	The traffic light system diagram on page 14 has been replaced with the flow diagram (figure 2L) on page 24.
	This is open to interpretation. Who is defining contextual conditions?	Any relevant planning application will have to be supported by a design & access statement / planning statement that will be required to undertake a context analysis of the locality for which a development is proposed. This will need to be undertaken by the applicant's design team. Any context analysis will then be reviewed by the Council planning officers (and where applicable, the Design Review Panel) to consider if this has been undertaken satisfactorily in terms of the SPD and for the scale of development.	No amendments considered necessary
	The diagram could be clearer asking one question at a time, i.e. is the proposed building tall (define tall)? Is the proposed building contextually tall (define what contextually is by reference to the relevant page in the SPD. Let the answers to each question flow to a decision or outcome presented as a flowchart.	Officers have revised the traffic light system, replacing it with a flow diagram. The flow diagram seeks to provide a process to determine if a proposal would constitute a contextually high building in a specific location. it provides links at each step to assist in addressing the relevant steps to determine a contextually high building or not.	The traffic light system diagram on page 14 has been replaced with the flow diagram (figure 2L) on page 24.
160	<b>3</b> ,	accurately reflect the definition of a tall building as set out in Policy D9 (Tall building) of the London Plan (2021). Officers have removed the traffic light system and replaced with a more simplified flow diagram. The flow diagram only relates to how to determine if a	The traffic light system diagram on page 14 has been replaced with the flow diagram (figure 2L) on page 24.
	The No route appears to say that any building can be built to six storeys if the prevailing height is 3 storeys. I disagree strongly with this.	Officers have removed the traffic light system and replaced with a more simplified flow diagram. The flow diagram only relates to how	
	to consider some applications and keep the ability for special	All planning applications are considered on their own merit. Where an applicant does not apply the guidance for a relevant development, Harrow Council Planning Officers will require this assessment to be undertaken.	No amendments considered necessary
	ENOUGH FUTURE GHETTOS ARE ALREADY HERE!	The SPD cannot (legally unable to) stop development, rather it looks to guide development to be of an appropriate height and of a high quality design. The Local Plan review will look to include a tall building policy which will identity appropriate heights and locations.	No amendments considered necessary

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	site-by-site basis where height should be determined by its own	Officers consider that the SPD is consistent with other design guidance and relevant policy, but provides a context based approach to suburban Harrow. It will assist applications coming forward to	
		fully address local context on a site-by-site basis.	No amendments considered necessary
	The system is all right but I believe contextually tall is not the correct parameter. Each planning permission is unique. Many of these tall developments do not offer sufficient social housing and are unaffordable to local people. It should be a priority in the application that developments are four storeys or less in suburban areas with 50% prioring social housing	Agree that each planning permission is unique, and it must be considered on its own merits. Contextually tall is considered appropriate based on the Harrow Characterisation & Tall Building Study (2021) which is the relevant evidence base for the borough and part of the evidence base for the SPD. The SPD will enable a contextual definition for each part of the borough. The SPD is unable to introduce new policy in relation to affordable housing, such matters are dealt with by existing policies within the Harrow Local Plan (2013) and the London Plan (2021). Design Principle H2 (Tall buildings assist in Harrow's provision of affordable housing)	No amendments considered necessary
161	Persistent focus on the 'context' and 'contextuality' according to an area, likely to protect some posh areas in the borough like Pinner, Stanmore, could be seen to protect the socio-cultural, class and political affiliation in these areas which is at the odds with the spirit of the equal conoctunities and Core Strategy.	The SPD is a design based document which seeks to ensure that new development respects the character of any area of the borough	No amendments considered necessary
	proposals. eg surrounding areaetc	The context analysis will have to take account of the existing building form and fabric, and any proposals that have been implemented. The SPD is clear on what considerations must be addressed.	No amendments considered necessary
	ahead if it satisfies the design guidance, but there should be a clear presumption against developing contextually tall or tall building in all the suburban areas of the borough whatever their	The SPD is clear that in most instances a tall building (as per the London Plan (2021) definition) will unlikely be supported. For contextually tall, it will have to address the guidance for contextually tall to be considered appropriate. It is not a presumption in favour of a contextually tall development, as the height of a development, depending on its context, may still be a reasonable reason for refusing a scheme.	No amendments considered necessary
		Each planning application is supported by a planning statement that provides supporting information relating to traffic related matters. The Highways Authority will provide input to the satisfaction of the information. The information and subsequent decision taken on an application is taken in accordance with the wider development plan and policies relating to traffic related matters.	No amendments considered necessary
	This system still enables developers to build overly tall buildings in Harrow. There should be a policy that simply limits the number of floors to six.	The revised flow diagram sets out a process to determine what would be a contextually high building, it does not determine the acceptability of a scheme. This will only be determined once all of the considerations have been addressed. The SPD is unable to apply a definition that limits the amount of floors, as it legally unable to apply such a limitation or introduce a policy that would limit the amount of floors. The local plan review will look to introduce a tall building policy that will address heights of tall buildings and locations (as required by the London Plan (2021))	No amendments considered necessary

		It will only work if the members of the council staff adhere to it. Unfortunately so far our experience has been that this is not the		
	Other	case. HMOs have sprung up in residential areas, unsympathetic extensions allowed and it is clear some builders are employing slave labour and illegal immigrants who are at the mercy of lack of health and safety. Again we have contacted the council over dangerous practices but no one bothered. They said it was up to the builders. We cannot just leave things "up to the builders" there needs to be rigorous inspection. We were concerned about way a loft extension was being built. When contacting the planning dept they merely said "Oh have they started to build the loft extension. They should have told us." No inspection happened.	The SPD is a material consideration in the determination of relevant planning applications. Any proposed developments that are considered to be contextually tall, will be required to demonstrate compliance with the guidance set out in the SPD. In determining a planning application, Council officers will assess developments against the guidance set out in the SPD also, along with relevant policies within the wider development plan.	No amendments considered necessary
		If Yes, rework and repeat until No.	The SPD is not seeking to (able to) set a height restriction for new development, rather, it seeks to provide guidance for development types that are already coming forward. The new local plan will seek to provide policy in relation to appropriate locations and height definitions.	No amendments considered necessary
		The system doesn't take in to account, on the light and environment in the area.	The flow diagram provides guidance on whether a new development proposing height would be contextually tall, tall or neither. It is not intended to provide assessment criteria. However, Design Objectives and Principles address light and environmental guidance.	no amendments considered necessary
62		It is not clear how this system could provide further guidance to prevent contextually tall buildings from being built in suburban residential contexts	The SPD seeks to provide guidance to ensure that proposals are appropriately sited and of a height that is appropriately for its context, it is not intended to be a presumption against any further height being added.	No amendments considered necessary
		The most relevant issues are safety and equality of access	The SPD covers material planning considerations as part of a planning application, which also must be in general accordance with the wider development plan. The development plan and Building Control Regulations provide policies in relation to safety and access.	No amendments considered necessary
		You cannot design away the height of a building. It is the height which changes the character of the area.	The intent of the SPD is not to provide a presumption in favour of, or against height, but to ensure any height that is proposed comes forward appropriately within its context. Following this, guidance is provided to ensure a high quality design of development. Proposals that are of an inappropriate height for their context will be resisted.	No amendments considered necessary

	Theme	Summary of Comments	Councils Response	Amended Text
Question 6				
Question: Do you	have any further com	ments on the Development Objectives?		
		Increasing population by more and higher building should NOT be a priority for Harrow. Population reduction by encouraging relocation out of Greater London should be the aim, Harrow included.	The SPD is not seeking to increase the population of Harrow, rather it is seeking to ensure that development that is already occurring, comes forward in an appropriate height for suburban Harrow and is of a high quality.	No amendment considered necessary
		Infrastructure to support new development is required; such as doctors, schools, hospitals, roads / parking, medical, education, good range of shops and updated leisure facilities	All new development (floorspace) attracts a financial contribution through Community Infrastructure Levy (CIL), which is used by the Council to fund infrastructure improvements within the borough. Some one off contributions may be secured from largescale major developments where they have a direct impact that requires mitigation.	No amendment considered necessary
		no, but again objectives C and D are not clearly defined	There is no definitive blanket definition that is able to be used, as a SPD must be positively prepared and remain flexible to allow for design variance and solutions to be brought forward. The SPD seeks to ensure that guidance is provided to allow design solutions, but ensuring that the prevailing character of Harrow is respected.	No amendment considered necessary
		Only creating new places that do not use or build upon any existing green belt land. We need to keep and preserve all green space as possible otherwise we run the risk of becoming more and more of a concrete jungle. That is not going to allow anyone to develop and grow there own mental and health wellbeing.	Land designated Green Belt currently has substantial protection under the wider development plan and also the National Planning Policy Framework (2021). The policy protection afforded under the development plan is considered to be sufficient, with this SPD unlikely to provide any further protection.	No amendment considered necessary
163		We need to ensure we have a real plan to deliver the amount of housing needed over coming generations. We cannot just conserve our own amenity at the expense of those coming behind us. This is not what we are benefiting from now - others in the past made decisions for substantial change to current amenity. To deny this same opportunity to future generations is not the right decision.	The SPD is a design document to assist in ensuring new development respects the character of suburban Harrow. In terms of delivering the future housing needed, this is set out within the Harrow local plan which is currently under review. This is not within the remit of a SPD.	No amendment considered necessary
		All above points absolutely necessary	Noted	No amendment considered necessary
		Too much of the language you use is too vague for anyone not involved to be entirely sure what you mean. For example, what is Metroland? Where is it? How would I recognize it?	The language of the SPD seeks to strike a balance between enabling lay- people and also professionals to utilise the document. Whilst language could be considered as vague, the SPD should not be overly prescriptive, to ensure flexibility to ensure creativity got for applicant would not be stifled.	No amendment considered necessary
		Many of these objectives conflict or are contradictory. There should be a weighting system prioritising some over others eg Sustainability should be prioritised over economic growth	It is not clear which objectives are considered to be contradictory. However, all of the design objectives and principles are considered to be important to the success of a development, and therefore each are considered important to be addressed. Weighting would result in other objectives and principles that may not be 'as important' not been given the due consideration they should, and potentially result in a lesser quality scheme.	No amendment considered necessary
		Most locals around my age that I speak to are not in favour of the character of suburban Metroland. We want modernisation. Please seek out locals on the streets and ask them.	Suburban Metroland is the historic character of Harrow and it is considered an important feature to preserve. However, modern architecture is not objected to, and subject to it being high quality design and appropriate height, it would find support within the SPD.	No amendment considered necessary

	<ol> <li>Section C2 on page 34 needs to be expanded to clarify what 'overly prominent' means. This is core.</li> <li>What is para 3.5.9 about? I walk wherever possible and know a lot of local residents who do likewise and never has anyone said a taller building would help them get around.</li> <li>On page 36 the right-hand drawing is an example of what SHOULDN't be allowed. The taller building is indisputably overbearing and fails design principle D2.</li> <li>'Under-utilised sites within their suburban context will not be supported' (para 3.10.5) contradicts 3.10.4 (which says 'Optimising does not mean maximising') and should be deleted.</li> </ol>	<ol> <li>The intent of Design Principle C2 (Prominence and townscape impact) is that tall and contextually tall buildings can cause harm by being overly prominent. What is overly prominent will vary from site to site by reason of the context in which a development is located within. A singular definition in terms of a building height would not be appropriate given this would be different to each context.</li> <li>Para 3.5.9 (Design Principle C3) seeks to ensure that new development that is tall or contextually tall addresses the street pattern. This includes ensuring that such a development would not be at odds with the street pattern, but can also assist those pedestrians who are visiting an area. The SPD is not promoting tall or contextually tall buildings.</li> <li>The image shown on page 36 is demonstrating how mass should be arranged to ensure satisfactory light to neighbouring properties, it is not intended to demonstrate an overall acceptable development.</li> <li>The key message is that a site must be optimised. this does not mean maximising the site area where other requirements of the development plan are now able to be provided (play space for example). Conversely, developments that provide too little development will not efficiently use the site where more development could be accommodated, but still be expected to deliver against all the obligations of the development plan.</li> </ol>	No amendment considered necessary
10	If optimising land use means building tall buildings at/near Tesco then I very strongly disagree. You are destroying our neighbourhood	Optimising land means that a development makes efficient use of a site, in terms of ensuring that development uses the site and delivers against all of the policy requirements that make a high quality development. Maximising development on the site is not encouraged, as this often leads to policy or guidance not being satisfactorily addressed within a proposal.	No amendment considered necessary
	Overall the objectives make sense on paper. In reality, Harrow has already suffered from more street crime and drug crime recently. Sexual assaults have increased too.	The SPD is a design document to assist in ensuring new development respects the character of suburban Harrow. It will assist also in ensuring public spaces are designed in a manner to reduce crime, with consultation with the Metropolitan Police encouraged.	No amendment considered necessary
	Picture under 3.5.2 on page 33 is shown as a 'good' example of accommodating height. However if you look at the original buildings on the right hand side of the picture it is obvious that the new blocks are too high, too angular and just out of keeping with the area.		
		Officers agree and note that design is a subjective issue. A number of the precedents used have been revised. Officers consider that the revised precedents provide high quality design, and specifically in relation to the design principle it is associated with. The matter in relation to infrastructure has been addressed elsewhere in the consultation responses.	No amendment considered necessary

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	I agree with most of the above. I believe the right kind of homes is what's needed. Family homes. Social housing. At the moment developers are building 'luxury flats' for profit, but paying lip service to social housing. All the luxury flats are the same: 1-2 bedrooms. Why? We don't need any more flats especially not in the Opportunity area. With 7000+ houses built in the last 10 years because there's a housing crisis, you'd think the purpose would be building what's most needed, rather than what's most profitable. You mention economic growth. There is no economic growth in Harrow. All major employers such as GE, Wickes, HMRC, NHS have moved to other boroughs. Most retail units in mixed developments are empty. What are the other borough doing to deliver economic growth, You can't just build housing with no jobs, social or community infrastructure.	The Council has no control over where market homes are sold. Planning mechanisms allow for the Council to seek where thresholds and viability allows, a mix of affordable housing types. However, cannot set where market homes are sold. The SPD seeks to assist with economic growth through providing guidance for non-residential floorspace. The local plan review will seek to further address economic growth issues, as it is more able to control and direct land use than what	No amendment considered necessary
165	"1930s leafy areas" characteristics of Harrow, as described by the planning portfolio- holder, have changed over the time, and the planning policies should reflect this. Census 2021 shows: Between the last two censuses (held in 2011 and 2021), the population of Harrow increased by 9.3%, from just under 239,100 in 2011 to around 261,200 in 2021. In 2021, Harrow was home to around 37.0 people per football pitch-sized piece of land, compared with 33.8 in 2011. Harrow saw England's joint largest percentage-point fall in the proportion of households that owned their home (from 65.3% in 2011 to 58.8% in 2021). In 2021, 45.2% of people in Harrow identified their ethnic group within the "Asian, Asian British or Asian Welsh" category (compared with 42.6% in 2011), while 36.5% identified their ethnic group within the "White" category (compared with 42.2% in the previous decade)]	the Harrow Characterisation & Tall Building SPD (2021)provides an updated characterisation snapshot of the borough from a character perspective. This has helped to inform the SPD. However, the local plan review will provide an updated borough profile, and policies will respond	No amendment considered necessary
	Large developments will take longer to build and will cause more blight, noise, mess and disruption. A quiet area will be badly affected. The scale of works has to be considered as well as part of the area's context.	Constructions works can be a nuisance for existing neighbouring residents. However, such works are temporary and planning informative can be included in any grant of planning permission in relation to hours of work on site and considerate contractors.	No amendment considered necessary
	Objectives D-I are irrelevant to taller buildings specifically. They confuse and muddle the policy, which should be much more focused on a clear presumption against developing buildings that are taller than the current prevailing height in suburban areas.	The SPD is unable to provide a provide a presumption against buildings that are less than that defined tall by Policy D9 (Tall buildings) of the London Plan (2021). The SPD seeks to provide guidance to ensure that buildings respect the character of suburban Harrow and are of a high quality design.	No amendment considered necessary
	Objective H may clash with the rest. See my comments on the previous page re the difference between high-quality design and construction.	The Council acknowledge that there is pressure to deliver the homes required of it by the London Plan (2021). However, there is a very clear direction from both reginal and central government that the character of an area must be respected, and that new development must be of a high quality. Officers consider that the SPD provides the guidance necessary to assist in ensuring new development is of a high quality, and the pressure of delivering new homes should not compromise achieving this.	No amendment considered necessary
	overdevelopment is a no . Maintaining front gardens and back gardens and all types of greenery should be first priority; planning should be restricted	the guidance contained within it. Guidance on greenspace and playspace	No amendment considered necessary

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	Harrow is an overpopulated concentrated concrete jungle. Please do not invite more ppl pollution cars parking or buildings. We need green spaces with tall and short trees planted. Give us Oxygen!!!!	The SPD is not seeking to increase the population of Harrow, rather it is seeking to ensure that development that is already occurring, comes forward in an appropriate height for suburban Harrow and is of a high quality.	No amendment considered necessary
	Many of the residents in the 'new builds' in central Harrow have concerns about noise pollution and anti-social behaviour. The quality of managing agents and their willingness to confront these issues when they arise needs to be considered.	The SPD provides guidance in relation to designing out crime and noise through design principles D7 and D10 respectively. Early consultation with the Metropolitan Police is encouraged at para 3.7.33.	No amendment considered necessary
	Matters on what the new homes are more one bedroom flats. How does build provide economic growth when it is large contractors, out of area workforce. No to Tesco Towers	The wider development plan seeks to ensure an appropriate mix of housing, which assists in ensuring housing choice (mix of occupancy levels). Furthermore, major applications often have local apprentices and suppliers secured through a legal agreement.	No amendment considered necessary
	We should only be putting housing developments on Brownfield or regeneration sites. We should not be using any Greenfield or developing in areas where regeneration is not required.	The wider development plan seeks to ensure new development is delivered on brownfield & regenerations sites, rather than on greenfield sites. The SPD does not seek to depart from this.	No amendment considered necessary
166	Objective A - This is not appropriate. Development should be design led as there may be cases where taller buildings are appropriate within suburban locations. This statement could lead to good opportunities for sensitive optimisation of sites to be missed. Objective B - Proposals for tall buildings adjacent to public open spaces can also enhance these areas, can provide additional services/amenities, provide funding for improvements, and can be assessed for impacts such as daylight/sunlight to ensure there is no detrimental impact. Should be design led.	Council Responses; Objective B: Agree that this should be design led. However, there is great potential for the interface between an open space and a tall (or contextually tall) building to create a poor interface between two very distinct characteristics. The design guidance assists in addressing this matter. Objective C2: Any contextually tall building will be required to complete a townscape assessment, but would be commensurate to the height and scale of the	
	Objective C2 – The requirement for proposals to be assessed for townscape impacts of height and massing (including through key views) is very onerous for buildings that are "contextually tall" (could be buildings of 4+ storeys). Objective C3 – The comment about new developments needing to justify why lower	development and the context in which it would be located. Objective C3: In the context of Suburban Harrow where there are no designated areas appropriate for tall building, they should be the exception. Suburban Harrow is unlikely to be able to accommodate tall buildings, so in the event that such a development is proposed, extra scrutiny is considered appropriate.	No amendment considered necessary
	heights cannot be progressed is highly inappropriate. Planning policy requires sites Traffic implications and impact on utilities and available community services and amenities should figure highly. I am unaware that people prefer to live in flats, so flat building should be discouraged. Affordable social housing should be the priority.	Infrastructure matters and social housing have been responded to elsewhere in the consultation document. However, flatted development is an appropriate form of housing that provides housing choice and can ensure the most optimal development for a site.	No amendment considered necessary
	"Appropriately" is an entirely subjective term, so I cannot comment on Objective C (although I have been forced to complete it). The priority should be maintaining the character of Harrow and making it a place where people want to live.	The SPD is seeking to ensure that development that is coming forward respects the prevailing pattern of development within suburban Harrow. What is appropriate in terms of height, will change across the differing character contexts across the borough. The working diagrams and guidance within the SPD is considered to provide satisfactory assistance to ensure height is located appropriate to its context.	No amendment considered necessary

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	It is vital to protect the current suburban nature of the area. No more buildings higher than the prevailing height please . Of course development needs to be sustainable, livable and well designed. But more homes that provide social housing are needed. No more flats at unaffordable priceswhich are then let at unaffordable prices. This lowers the standard of living of local people as they spend so much more on ridiculously high rents to unscrupulous landlords and therefore have hardly any disposable income left The character of Harrow has so deteriorated a huge amount in the 40,+ years I have lived here. There has been no thought or consideration to the overall design of the townIt now consists of random , higgledy -piggledy , uncoordinated developments with poorly built, over tall buildings. Probably not possible to put this right now .but please no more of this poorly coordinated building . And please make consultations more neutral with more open ended questions. This one has been designed to get the answers the council wants to achieve	the Harrow Characterisation & Tall Building SPD (2021)provides an updated characterisation snapshot of the borough from a character perspective. This has helped to inform the SPD. The SPD seeks to ensure high quality development going forward. The SPD is unable to directly influence the cost of new homes sold privately. The wider development plan (particularly the London Plan (2021)) sets out policy requirements for affordable housing, which carries more weight than a SPD. With regard to consultation, this follows agreed standards agreed by Harrow Cabinet within the Statement of Communications Department. The point is noted however.	No amendment considered necessary
	Given the continued demand for housing in the area, and in London more generally, providing more housing while enforcing tough height restrictions may lead to undersupply (thus reducing affordability for current and future residents) or housing with too little floor space. Also, whilst I love the character of suburban Metroland, I would define this as including buildings of varying sizes, ages and architectural styles as this is how	The SPD is not seeking to provide a height restriction, rather it is seeking to ensure that development coming forward has sufficient guidance to ensure high quality design that respects suburban Metroland. Whilst officers appreciate the pressures faced in delivering homes, which are set by the London Plan (2021), the delivery of housing should not come at the expense of good quality design and harming of local character. The design guidance seeks to ensure high quality design, which can allow	
167	Metroland has been all my life. Objective H is ridiculous. Any new building provides new homes. Whether those homes are needed is another matter. Interestingly, the retirement homes in Marsh Road Pinner have yet to sell out some years after building. It is also interesting that Trinity Court appears only partially filled after some time. This indicates that there is not a 'need' for housing, but rather a desire by developers (and the council in Waxwell Lane) to make money. In addition, the footfall in Pinner seems very low, which indicates that the people buying these houses are not developing economic growth in the community.	for modern / contemporary buildings. New developments do not need to replicate / mimic the existing designs. The delivery of housing is a requirement of the London Plan (2021), which currently requires the Council to deliver 802 homes per year. By reason of this, the Council must look to ensure housing is delivered within the borough. The SPD is a material consideration for developments and regardless of use and must be considered alongside the wider development plan.	No amendment considered necessary
	Don't allow Pinner Road development to go ahead. We need to protect green spaces, and badgers!	The SPD provides guidance in relation to how green spaces and biodiversity (Design Principles D11 and F6) shall be addressed as part of a development.	
	The last three are 'somewhat agree' as these are the areas where compromise may be necessary. Eg. Optimise land use - some land may need to be sacrificed to allow more green space rather than build on every square inch. Quality of life is equally important. Provide new homes - alternatives to development should also be considered, eg, refurbishing existing houses into maisonettes, for instance, rather than but up then knock down several houses and build a hideous block of flats. Deliver economic growth - too complex to get into this one in this context.	Optimising land means that a development makes efficient use of a site, in terms of ensuring that development uses the site and delivers against all of the policy requirements that make a high quality development. The SPD provides guidance on sufficient greenspace for amenity/playspace/biodiversity, which are also policy requirements of the wider development plan. The SPD provides guidance for new build developments, to ensure they are of a high quality design. However, refurbishing existing stock is also appropriate, conversions of dwellings are subject to other policies within the development and guidance.	
	Objectives C, G, H & amp; I should be viewed positively but should not confer a presumption in favour of building above prevailing height. Applications should always have to demonstrate that all reasonable alternatives have been adequately considered.	The SPD does not provide a presumption in favour of tall or contextually tall buildings. However, officers consider that the formula to consider what would be 'contextually tall' is appropriate to then apply the guidance. It should be noted that developments less than what would be considered contextually tall, would not automatically be considered acceptable.	No amendment considered necessary
	Provide proper parking facilities. This is not provided for anywhere creating worse situation for homeowners in near distance to new developments.	The SPD provides guidance on Transport & Parking (Design Principle D5), however parking requirements are set by the London Plan (2021).	No amendment considered necessary

infrastructure, roads etc make parking easier for shoppers. All these changes will raise local economy and provide new homes whilst making the residential and	The SPD is seeking to assist new development where further height is proposed, to ensure it would respect the character of suburban Harrow and be of a high quality design. However, there is no objection to	
 	development occurring as set out in this response.	No amendment considered necessary
As before for C above 1:1 height to sustain character, not doubling height H above, Do we really need more people in Harrow I above, for economic growth we need to match new workplaces with proposed new homes, also all services, hospitals, schools, etc. should math and upgraded or new to cater for the new people	(subject to scale and use) attracts a Community Infrastructure Levy, which is funding that is used to fund new infrastructure such as those noted in	
	the response.	No amendment considered necessary

	Theme	Summary of Comments	Councils Response	Amended Text
Question 7				
Question: Do	you have any other comments	about the Draft Tall Buildings ('Building Heights') Supplementary	Planning Document (SPD) including any changes co	nsidered necessary to improve the document?
Comments in	 	nly addressed where not addressed previously.		
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		Will retrospective action be taken on Planning Applications that do not meet new criteria	No. The SPD will only be able to applied to new development submitted for planning permission to the Council	No amendment considered necessary
	Designated Area for Tall Buildings	Near stations even if its metropolitan open land if its built on it should be effectively utilised	The SPD seeks to optimise land that is available for development, and also seeks to ensure it is of a high quality design.	No amendment considered necessary
		Tall buildings do not have a place in the Harrow borough. Areas around South Harrow, Harrow View, Harrow Town Centre have all been ruined with extra tall buildings bringing with it anti-social behaviour, huge numbers of poverty and filth to areas which had enjoyed safety and open spaces.	The SPD does not seek to identify appropriate locations for tall buildings within the borough, as this is outside of its remit (legally unable to). It seeks to ensure that new development is contextually appropriate and of a high quality design. Applying the guidance within the SPD, developments will be more likely to address the matters raised within this response.	
		Designated more micro areas as suitable for tall buildings. Recent developments in Harrow town centre are perfectly reasonable, using land which is otherwise poorly used (next to railway line etc). Where else can we support tall buildings?	Noted. The SPD does not seek to identify appropriate locations for tall buildings within the borough, as this is outside of its remit (legally unable to). The new Harrow Local Plan will be required to designate areas appropriate for Tall Buildings, as required by Policy D9 (Tall buildings) of the London Plan (2021).	No amendment considered necessary
169		I think there need to be more concrete definitions for some subjective terms.	It is not clear what terms are referred to. However, officers have sought to ensure that the SPD is able to provide sufficient clarity of guidance whilst still remaining flexible.	No amendment considered necessary
		this creates barriers to building tall buildings that will help address the housing crisis and achieve the right density for our borough within a city like London	The SPD does not seek to stifle or restrict new development, rather it provide guidance to support existing policy to assist new development clearly understanding the policy and development requirements within suburban Harrow.	No amendment considered necessary
		Section 3 on design principles and objectives is full of pages where images are intended but missing. As these images will play a very important part in the document they should be added in and then the document should be subject to a further consultation.	Officers acknowldge that the link within EngagementHQ consultation platform did not link to the working drawings. However, the matter was rectified as soon as practcailly possible, leaving sufficient time to review. Furthemore, the draft SPD was provided on the Harrow Council website under Supplementary Planning Documents page, where the working examples were able to be viewed.	No amendment or further consultation is considered necessary
		This document is looking to allow tall buildings to be developed in suburban areas of central Harrow. This is unacceptable. The Tories promised to stop the development of tall buildings when seeking council election and residents will remember at the ballot box if this promise is reneged on.	The SPD is specifically seeking to ensure that development that does occur in suburban Harrow respects the character of the area. The SPD seeks to provide guidance that will assist new development in suburban Harrow being appropriate to its context, and will be of a high quality of design. Whilst the SPD does not provide guidance within the Harrow & Wealdstone Opportunity Area, it does not seek to provide a presumption in favour of tall buildings in any part of the borough.	No amendment considered necessary
		This is a detailed document and obviously much research has gone into it. However the position should be much simpler - no 'tall' or 'contextually tall' buildings to be permitted unless in very exceptional circumstances.	A SPD must be positively prepared, and is unable to introduce policy. It does not provide a presumption in favour or against contextually tall buildings. however, it does set out that tall buildings that meet the tall building definition in the London Plan (2021), which are proposed in suburban Harrow, are unlikely to be supported due to harm caused.	No amendment considered necessary

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	It will only work if you follow your own policies. Policies in the Harrow and Wealdstone Area Action Plan are not being followed. The Safari Cinema flats are 11 storeys in an area slated for maximum 6 storeys.	All planning applications must be considered against the development plan (both Harrow Local Plan (2013) and the London Plan (2021)). The SPD would not apply at this site as it is located within the Harrow & Wealdstone Opportunity Area.	
	<ol> <li>Realistic parking provision must be required in large developments. The calculation for residences should be an average of car ownership rates in the local neighbourhood. For businesses it depends on expected customer and staff numbers. If no provision is made developers must quantify the number of available parking areas and their usage nearby and how the estimated vehicle ownership rate will impact them.</li> <li>People socialize. High-density housing buildings should be built with large function rooms that can be hired by residents only for big social events. That way, residents can hold parties without blighting quality of life of their next-door neighbours.</li> <li>Rooftop terraces should be treated with suspicion because all noise made will carry further into the neighbourhood, and because the need for safety barriers adds effectively an extra storey. Balconies are also prone to more noise.</li> </ol>	<ol> <li>Car parking is determined in accordance with the relevant policies within the London Plan (2021). Any departure from these would need to be demonstrated on a case by case basis as part of a planning application.</li> <li>The SPD is unable to require ancillary floorspace for flatted developments.</li> <li>Housing must meet the Nationally Prescribed Internal Space Standards.</li> <li>Care must be taken when proposing roof top terraces for issues such as noise and overlooking. Design Principle D4 (Residential amenity), Para 3.7.15 provides some guidance for roof terraces.</li> </ol>	No amendment considered necessary
170	The additional validation requirements for contextually tall buildings is very onerous considering this could be an application for a building just 4 storeys tall. Requiring a Microclimate Assessment in this instance is unnecessary and will just deter applicants. The requirements should be required on a case by case basis, many will be required anyway. A 4-storey "contextually tall" building could still be a minor application, and these requirements are challenging.		
	HGH previously submitted representations to the consultation on the Harrow Characterisation and Tall Building Study, noting that: - the approach was innovative but a mathematical formula is not appropriate for the complex and challenging situations that arise between sites of different natures - the approach is likely to be overly conservative, particularly with regard to the town centre (prevailing heights are given as 4-5 storeys) - the document was contradictory in identifying Central Harrow as both suitable for and sensitive to tall buildings - the document did not acknowledge planning policy supporting the optimisation of under-utilised land within settlements for homes - no acknowledgement that buildings exceeding the suggested height limit might be appropriate in cases where there are merits to do so	<ol> <li>Microclimate is not a required document as set out in the the PAR, although a wind study is for tall buildings (more than 30m). Officers note that in not all instances a microclimate assessment would be required, and this is something that ought to be discussed with the LPA during pre-application stage, and confirmed or otherwise on a case by case basis.</li> <li>Officers have amended the text accordingly.</li> <li>The consultation undertaken is in relation to a SPD, and not the Harrow Characterisation and Tall Building Study (2021).</li> <li>The Council is not seeking feedback on this evidence base document. However, the Characterisation Study is an evidence base document, noting the many conflicting interests when dealing with developments that propose additional height. For the purposes of the SPD, the evidence within it has been used to seek to ensure new development</li> </ol>	Revision to paragraph 4.1.4: The following are assessments that are specifically typically 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. Engagement with planning officers through the pre- application process can assist in finalizing supporting
	The proposals are generally too weakly worded to ensure buildings are high quality. Much of the recent or fairly recent build in Harrow has been of lamentably low quality - eg the flats over the Nita Cash and Carry at 186 Pinner Road, and, the central Harrow Morrisons development. I suggest Harrow require developments to be high quality and development objective means for assessing whether that is achieved.	protects the suburban character of Harrow. The intent of the SPD is to improve future developments, as once adopted it will become a material consideration in the determination of planning applications. There is currently no contemporary local design guidance for such developments. The SPD is worded in a manner to ensure that it is not overly prescriptive and allows for design innovation to occur, whilst adhering to design principles to ensure a high quality design is achieved.	documents on a case-by-case basis.

<u>د</u>	proposed developments	application stage.	Council are unable to be commented upon.	No amendment considered necessary
7	Commentary on existing or		Schemes that are not currently a live application before the	
<b>→</b>			applicable to new proposals within suburban Harrow.	
		, , , , , ,	been permitted by way of planning permission/ It will only be	
		A number of responses have referred to developments in the borough,	The SPD is not applicable to developments that have already	
			wider development plan.	No amendment considered necessary
		and comprehensive planning scheme	material considerations and the relevant policies within the	
		The tall buildings SPD is only part of what required to have a sustainable	planning applications. It must be considered along with other	
			The SPD is a material consideration in the determination of	
			is much lower.	No amendment considered necessary
		Ensure that you go by the heights outlined in the document, not by existing c heights of buildings that are already considered too tall.	height in the area if the remainder of the prevailing character	
			an area, and should not form a basis or rationale for further	
			character of that area. a taller building may be an anomaly in	
			defined by 1 or even 2 tall buildings, rather the prevailing	
			determining context. The context of an area will not be	
			The working examples provided in section 2.5 assist in	
		P	(2021). Local evidence base supports this.	No amendment considered necessary
			he wider development plan, specifically the London Plan	
			Principle H2), however the mix for social housing is set out int	
		Sustaining the social mix of housing facilities is important in keeping the	The SPD provide guidance to affordable housing (design	
			with other languages can be made provision for.	No amendment considered necassary
		language.	providing further clarity on specifc schemes, where assistance	
		sophisticated wayor indeed do not read English as it is not their first	matters. Pre-application with planning officers can assist in	
		access to many more people who do not read English in such a	and the SPD should form the basis of discussions on such	
		There should have been a simplified version and therefore provide more	complicated. Officers consider this balance has been struck,	
			planning matters that by their very nature, can be more	
		The document is over complicated and difficult to absorb or understand for	clear and simple language, but still seeking to respond to	
			The SPD has sought to strike a balance between providing	

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#### Tall Building ('Building Heights') Supplementary Planning Document (SPD) Consultation Statement June 2023

# 1. Tall Building ('Building Heights') Supplementary Planning Document (SPD)

- 1.1 This consultation statement has been prepared in accordance with Regulation 12 (a) of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 The purpose of a consultation statement is to;

(i)the persons the local planning authority consulted when preparing the supplementary planning document;

(ii)a summary of the main issues raised by those persons; and

(iii)how those issues have been addressed in the supplementary planning document; and

(b)for the purpose of seeking representations under regulation 13, make copies of that statement and the supplementary planning document available in accordance with regulation <u>35</u> together with details of—

(i)the date by which representations must be made (being not less than 4 weeks from the date the local planning authority complies with this paragraph), and

(ii)the address to which they must be sent.

# 2. Name of the Supplementary Planning Document (SPD)

2.1 Tall Building ('Building Heights') SPD

## 3. Purpose of the Document

- 3.1 The Supplementary Planning Document (SPD) sets out detailed guidance for planning applications proposing buildings which are tall or 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 for proposals for that are tall, or taller than the prevailing pattern of development in suburbia.
- 3.2 The SPD only applies to areas outside of the Harrow & Wealdstone Opportunity Area. It builds on the Harrow Characterisation and Tall Building Study, which was completed in August 2021 by Allies & Morrison Urban Practitioners.

3.3 Once adopted, the SPD will provide specific guidance on the implementation of Local Plan policies for future planning applications which come forward and will support further technical work which may be required. It will be a material consideration when determining planning applications.

## 4. Stakeholders consulted during preparation of the SPD

- 4.1 In drafting the SPD, the Council consulted all relevant specialist service providers within the Council and a number of external consultees (Development Management (x2), Highways Authority, Waste Authority, Drainage Authority, Environmental Health, Landscape / Biodiversity). Further to this, the Council also consulted with external stakeholders, including the Greater London Authority / Mayor of London, Metropolitan Police (Secure by Design), and the Harrow Design Review Panel.
- 4.2 Throughout the drafting of the draft SPD, officers reported to the Planning Policy Advisory Panel, a cross-party panel that provides feedback on planning policy matters. This includes providing feedback on matters such as SPDs.

# 5. How were stakeholders formally consulted?

- 5.1 Formal consultation was undertaken as set out in the Harrow Council Statement of Community Involvement, and as set out and agreed by Cabinet on the 16<sup>th</sup> February 2023. The formal consultation consisted of the following;
  - a. *Website* EngagementHQ is a dedicated consultation page that provided information on the draft SPD and hosted the consultation documents, including, Draft SPD, background documents, online survey and alternatives means of making representations.
  - b. *Hard copies* were made available for inspection at the Greenhill Library, Perceval Square, College Road, Harrow, HA1 1GX.
  - c. *Email and letter notifications* to stakeholders and contacts on the Harrow Local Plan consultation database (including statutory consultees).
  - d. Social media presence and messaging Promoting the draft SPD consultation on social media assisted is a rapid digital outreach to a wide range of local people, including those in younger demographics. Harrow Council's communications team used social media resources.
  - e. Online drop-in sessions events allow the presentation of key consultation material to an audience, combined with direct questions and feedback. Two online sessions were held on Zoom, with details how to attend on mail out information and on the consultation website. A summary is attached as Appendix 2.
  - f. Survey sought respondent views on the draft SPD which was included on the EngagementHQ website.
- 5.2 The consultation period ran from Monday 27 February 2023 through to midnight Monday 17 April 2023.
- 5.3 All formal consultation documentation is set out in Appendix 1

5.4 The Council has consulted the three statutory consultees (Environment Agency, Natural England, and Historic England) on the SPD's Strategic Environmental Assessment (SEA) screening assessment. This concluded that the SPD is not going to have significant environmental impacts and therefore does not require a SEA. Each of the three statutory consultees responded in relation to this, stating that it either did not have an opinion or agreed with the position of the Council.

# 6. Consultation Responses, Summary of the main issues, and how the Council is responding

6.1 178 responses were received in relation to the consultation. These were from statutory consultees, residents and planning agents. The following provides a summary of responses:

# Statutory Consultee Responses

## Greater London Authority / Mayor of London

- 6.2 All Local Development Documents in London must be in general conformity with the London Plan under section 24(1)(b) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004). Whilst a SPD is not a Development Plan Document (DPD), it's a Local Development Document as, as such, the Mayor of London may give an opinion to its general conformity with the London Plan. The Mayor is supportive of further design guidance such as the draft SPD in terms of its intent. However, three elements of concern with the draft SPD have been raised as conflicting with the London Plan (2021). GLA officers have delegated authority from the Mayor of London to provide comment in relation the draft SPD.
- 6.3 Officer Response: The GLA raised concern that the draft SPD does not, when referring to a London Plan (2021) tall building, fully reflect the definition set out within Policy D9 (Tall buildings) of that plan. This could lead to ambiguity or confusion for users as to what the overall height of a tall building could be. Officers agree that the definition for a tall building as set out in Policy D9A (Tall buildings) of the London Plan (2021) should be set out verbatim to avoid any confusion. Any reference across the SPD to the London Plan definition follows this definition.
- 6.4 GLA officers are concerned with the term 'contextually tall', which is considered to create an alternative and competing local tall building definition below the minimum definition set out within the London Plan (2021). GLA officers are of the opinion that the competing local definition for a tall building therefore results in the draft SPD being in direct conflict with Policy D9 of the London Plan (2021). Any local definition of a tall building should not be less than that as defined within the London Plan (2021), and a definition should be set out within a Local Plan document that has been through an Examination in Public (where a SPD is not subject to such a process).
- 6.5 <u>Officer Response:</u> The GLA's concerns are noted, although these are arguably semantic. Consideration has been given to an alternative term that is able to be used to replace 'contextually tall' buildings, when referring to such proposals that are equal to or twice the height of the surrounding context, but less than that of the London Plan (2021) definition of a 'tall' building. It is considered that 'contextually high' is an appropriate alternative term which ensures that any consideration of a scheme still requires a contextual analysis, specifically in relation to the impacts of height. The use of this term resolves the concern raised by the GLA in relation to

any potential confusion between the London Plan (2021) definition of a tall building (by avoiding the word 'tall'), and the context-based approach used within the SPD.

- 6.6 GLA officers consider that the existing name of the document 'Tall Buildings ('Building Heights') SPD could result in a misleading and confusing message about the purpose and function of the document.
- 6.7 <u>Officer Response</u>: The SPD seeks to provide guidance to ensure that suburban Harrow is protected from inappropriately tall buildings (among other material considerations), and to ensure high quality of design.
- 6.8 The title of the SPD provides a clear indication that the guidance within it relates to tall buildings. The content within the SPD however is very clear that the guidance for what would be a contextually high building in a suburban location, is not in conflict with definition of a tall building as set out in Policy D9 (Tall buildings) of the London Plan (2021). Chapter 1 of the SPD makes it clear where and when the SPD should be engaged, and that the London Plan (2021) as the spatial strategy still provides the definition of a tall building. Chapters 1 and 2 are clear that a context based analysis for proposals in suburban Harrow is undertaken, with Chapter 3 providing design guidance for contextually high buildings and also tall buildings (as per the London Plan (2021) definition

#### Transport for London (Spatial Planning)

- 6.9 TfL (Spatial Planning) have provided a response to the draft SPD to reflect TfL's statutory duties as the strategic transport authority. The response received from TfL (Spatial Planning) amount to a number of minor amendments suggested to more accurately reflect relevant policy and guidance. Such amendments were limited to Design Principles C1 (Sustainable Locations), D5 (Transport and Parking), and D10 (Air, Noise and Microclimate).
- 6.10 <u>Officer Response</u>: It is considered that the proposed amendments are minor, and would assist in better reflecting the relevant policy and guidance which the SPD seeks to be in general conformity. Including the amendments where appropriate would continue to ensure that the guidance set out in the SPD would remain robust.

#### Transport for London (Infrastructure Protection)

- 6.11 TfL (Infrastructure Protection) is noted as responding to confirm no formal comments in relation to the drat SPD. However, to confirm that developments adjacent to TfL infrastructure will require consultation with TfL to be undertaken.
- 6.12 <u>Officer Response</u>: This response is noted and consultation would be carried out as this is already undertaken. No amendments to the draft SPD are required.

#### Environment Agency

6.13 The Environment Agency is in general support of the draft SPD, and confirm that the SPD will support the Local Plan's commitments to sustainable development and positive environmental outcomes. The response notes the design principles and does not state that there are any further required to assist in addressing their concerns. Notwithstanding this, the Environment Agency has made a number of suggestions in relation to the guidance covering biodiversity, green infrastructure and lighting. Minor amendments under these deign guidance principles have been made where appropriate and ensure the guidance meets the intent and purpose of the SPD.

### Historic England

- 6.14 Historic England is the Government's advisor on the historic environment and seek to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.
- 6.15 Historic England has provided a number of general comments in relation to the draft SPD, which generally seek to place more emphasis on heritage assets. Following the general comments, the Historic England response provides an appendix with a number of suggested amendments. The proposed amendments are minor in nature and are intended to assist in ensuring that heritage matters are addressed as robustly as possible to ensure ongoing protection of assets and their significance.
- 6.16 <u>Officer Response</u>: The majority of the proposed minor amendments have been incorporated into the guidance, which still ensure the intent and purpose of the SPD would be achieved. It is considered that the SPD through guidance set out in the Assessing context (Section 2.2) and design principles (Section 3) provide sufficient emphasis on the importance of heritage assets and how proposals should address these as part of the design process.

#### Natural England

6.17 Natural England provided a response to confirm that the topic of the Supplementary Planning Document did not appear to relate to their interests to any significant extent. No formal comment was therefore provided. Natural England also had no comment to make on the Strategic Environmental Assessment.

#### General Responses

- 6.18 As set out in section 3 above, a total of 178 responses were received in response to the consultation. The substantive comments received, officer responses, and proposed amendments to the draft SPD are set out in Appendix 2. However, the following provides a summary of responses received and officer's responses.
- 6.19 Across the consultation responses, multiple suggestions of definitions of what a tall building should be were provided. Definitions ranged from anything higher than the existing height, up to a maximum height of 12 storeys.
- 6.20 <u>Officer Response</u>: A SPD is unable legally to set a height or location for tall buildings, as that would fall outside the legal remit of a SPD. Rather, this would have to be set through a Local Plan policy as part of the Local Plan review and would ensure general conformity with the London Plan (2021). The SPD is seeking to provide guidance to buildings that are less than the tall building definition as set out in policy D9A (Tall buildings) of the London Plan (2021).
- 6.21 The SPD is overreaching its remit and does not accord with the London Plan (2021) by introducing a definition less than that set out in Policy D9 (Tall buildings) of the London Plan (2021). It will reduce affordable housing delivery.
- 6.22 <u>Officer Response</u>: The SPD is clear that the guidance does not set a definition for a tall building. The SPD is clear that Policy D9 (Tall buildings) of the London Plan (2021) sets out a tall building definition and provides policy on how boroughs,

through development plans must address tall buildings. The SPD provides guidance on how to contextually determine what would be a high building within a certain location within suburban Harrow, which would be less than what is defined as a tall building in the London Plan (2021). The SPD does not provide a presumption against high buildings, rather it seek to ensure height is progressed appropriately and any proposals are of a high quality design. The delivery of housing, especially affordable housing, will continue to a key pressure to deliver. However, the delivery of housing should not be at the expense of high-quality design.

- 6.23 It is noted that the GLA in their response (summarised above) has not objected to the SPD in relation to conformity with the London Plan (2021) and is supportive of the guidance (subject to their suggested amendments).
- 6.24 The Harrow local plan review is currently being progressed and this will address tall buildings and will seek to be in general accordance with D9 (Tall buildings) of the London Plan (2021).
- 6.25 The proposal needs more consultation.
- 6.26 <u>Officer Response</u>: The SPD has been consulted in accordance with the Harrow Statement of Community Involvement, with the consultation undertaken agreed by Harrow Cabinet. Furthermore, the statutory timeframe was extended to seven weeks to allow for the Easter Holiday period. All relevant consultation material has been available online and in hard copy (Greenhill Library) and advertised through numerous channels as set out above under section 3. Online public consultation events were held to allow further information to be sought and questions to be asked of officers in relation to the proposed SPD. Any development proposals will be subject to consultation as part of the planning application stage. Officers are satisfied that the consultation undertaken is appropriate.
- 6.27 The draft SPD is not definitive enough
- 6.28 <u>Officer Response:</u> A SPD is a guidance document to adopted policies within the Local Plan, and is unable to be as definitive as a policy within the Local Plan. The draft SPD must allow sufficient flexibility to allow applicants to achieve an appropriate development without stifling creativity. The draft SPD provides guidance to assist in developments achieving appropriate height and a high quality of design.
- 6.29 Need to clarify both floors and meters when referring to a building height.
- 6.30 <u>Officer Response</u>: It is agreed that providing both floors and meters would provide greater clarity where appropriate and this is reflected in the revised SPD.
- 6.31 Existing developments are not of a high quality
- 6.32 <u>Officer Response</u>: The draft SPD is unable to influence existing developments that have already been implemented, however would be able to assist in improving the design quality of future developments.
- 6.33 A number of precedents were considered to not be representative of good quality development examples.
- 6.34 <u>Officer Response</u>: Precedents were provided where they were able to visually demonstrate a successful element of design that is seeking to be achieved through the design principles. The precedents have been reviewed and updated examples

provided where appropriate from across London which are considered to be of highquality design.

- 6.35 Clarification of overly prominent definition
- 6.36 <u>Officer Response:</u> It is noted that the term overly prominent is a relatively subjective term. However, what would be overly prominent can only be determined following the context based analysis (following the process set out in the SPD) and will be defined on a case by case basis.
- 6.37 There should be a clear presumption against any development above the current height in the area. Also, the policy should operate only by reference to current heights as of 2023 (i.e. any future development of taller buildings shouldn't "move the goal posts" and make it easier to develop more tall buildings.)
- 6.38 <u>Officer Response:</u> The Harrow Characterisation & Tall Building Study (2021) sets out that at twice the prevailing height there is the potential for harm to the character of the area. Furthermore, the London Plan (2021) sets out that in development plans, boroughs must recognise that local character evolves over time. Whilst the SPD does not form part of the development plan, it must be drafted in a manner that will comply with policy set out in the new local plan (which will have to demonstrate general conformity with the London Plan). Whilst character will evolve over the time, the SPD seeks to ensure that this will occur appropriately.
- 6.39 The Harrow & Wealdstone Opportunity Area is not included within the remit of the SPD as there are residents within this who would wish to be protected from tall buildings.
- 6.40 <u>Officer Response:</u> The SPD does not include the Harrow & Wealdstone Opportunity Area (as set by the London Plan (2021)), as this is an area that is where growth is directed and is subject to more significant change. Conversely, the suburban areas of Harrow as an outer London borough, are much more susceptible to the impacts of development. For this reason the SPD seeks to ensure development in the suburban context of Harrow respects that character of that area.
- 6.41 Whilst the SPD would not be applicable to developments with the Harrow & Wealdstone Opportunity Area, they would nonetheless be subject to the Development Plan (Harrow Local Plan (2013) and London Plan (2021)), which would provide relevant policies for assessment.
- 6.42 Going forward, the Council has committed to reviewing its local plan, which in seeking to ensure general conformity with the London Plan (2021), will need to proactively plan for tall building developments (as required by Policy D9 (Tall buildings) of the London Plan (2021). This will involve identifying appropriate locations for tall buildings, what height of a building would constitute a tall building, and also appropriate heights of such developments. Following the local plan review, further mechanisms such as design codes are also available for the Council to consider.
- 6.43 Lack of infrastructure to support new development (Such as highways / doctors / school places)
- 6.44 <u>Officer Response:</u> New development attracts a 'tax' through the Community Infrastructure Levy (CIL), which is collected by the Mayor of London and also by the

Council. The purpose of collecting CIL money is to assist in the funding of new infrastructure.

- 6.45 Furthermore, the Council has an ongoing dialogue with infrastructure providers such as the NHS to understand their needs, and look to secure floor space for them within new developments where they have identified a need.
- 6.46 The SPD is not proposing a presumption in favour of new development, rather setting out guidance to assist in new developments being appropriate in height and of a high-quality design. Such proposals have been and are coming forward already, and without such detailed guidance. Funding infrastructure through the CIL is considered the appropriate mechanism for infrastructure improvements.

## 7. Proposed Changes to the SPD

- 7.1 Following the consultation period as outlined above, officers reviewed all the responses. Where appropriate, amendments to the SPD have been made. The following provides a summary of the changes that have been made to the SPD.
  - a) The term 'contextually tall building' has been replaced with the term 'contextually high building'.
  - b) Greater clarity of scope of where to use / how to use the SPD in terms of location and for types of development.
  - c) Review and update of particular precedents that better reflect high quality design as sought by the design principles within the SPD.
  - d) Removal of the traffic light system flow chart under Chapter 1 How to use this document. This has been replaced by a more simplified diagram for assessing context in Chapter 2.
  - e) Greater clarity between the role of the SPD in dealing with context and the much separate role of Policy D9 of the London Plan (2021).
  - f) Minor text changes with respect to consistency of terminology and with other relevant policy and guidance.

June 2023, Version 2.

## **Appendix 1 – Copies of consultation documents**

## Appendix 1A (Copy of letter)

Name and address

Date: 27 February 2023

Dear Consultee

#### Town and Country Planning (Local Planning) (England) Regulations 2012 Draft Supplementary Planning Document – Harrow Tall Buildings ('Building Heights')

Harrow Council has prepared a draft Tall Buildings ('Building Heights') Supplementary Planning Document (SPD).

The purpose of the draft SPD is to provide guidance to determine what would constitute a contextually tall building within suburban Harrow, and provide contemporary design guidance for buildings that are considered to be contextually tall (as defined in the SPD) or a tall building [as per the definition set out in Policy D9 (Tall buildings) of the London Plan (2021)]. Such guidance seeks to support and provide further guidance to policies in the current Harrow Local Plan (and any subsequent Plans) as well as the London Plan 2021.

The SPD provides guidance to assist in undertaking a context-based analysis to assist in determining if applications would reflect Harrow's character and context as identified in the Harrow Characterisation Study 2021. Contemporary design guidance is also provided to ensure that buildings that are either contextually tall or tall (as per the London Plan) achieve a high standard of design.

The SPD is intended to provide guidance and certainty to applicants, designers, developers, and residents with respect to the design of new development that proposes to increase height through a redevelopment or an increase in height to existing buildings. The Council is therefore seeking input into the draft document from stakeholders to shape its final form prior to adoption.

#### **Consultation Details**

The consultation period runs from Monday 27<sup>th</sup> February 2023 to Monday 17<sup>th</sup> April 2023.

The Harrow Tall Buildings ('Building Heights') SPD, accompanying documents and details of consultation arrangements (including online consultation events) can be viewed online at <u>https://talk.harrow.gov.uk/hub-page/planning</u>. The document can also be viewed at the following address:

Greenhill Library Perceval Square College Road Harrow

### HA1 1GX

Please contact us if you wish to discuss document access.

#### **Consultation Responses / Representations**

Any comments (known as representations) should preferably be made using the questionnaire available online (<u>https://talk.harrow.gov.uk/hub-page/planning</u>). You are encouraged to use the questionnaire or structure of the questionnaire to comment. In commenting you can let us know how the Draft SPD should be changed.

Alternatively, representations can also be submitted by using the following methods:

- By email to: <u>ldf@harrow.gov.uk</u>
- By post to: Planning Policy Team, Harrow Council, PO Box 1358, Harrow, HA3 3QN

Any representations must be submitted before midnight **Monday 17<sup>th</sup> April 2023**.

#### **Consultation Events**

The Planning Policy Team and colleagues will also be available online to discuss the draft Tall Buildings ('Building Heights') SPD at the following times:

- Wednesday 8<sup>th</sup> March 2023 between 6pm and 7.30pm
- Tuesday 21<sup>st</sup> March 2023 between 6pm and 7.30pm

For joining details for these events please see <u>https://talk.harrow.gov.uk/hub-page/planning</u>

For further information please contact the Harrow Planning Policy Team by emailing <u>Idf@harrow.gov.uk</u> or calling 077 3159 1724 or 0208 736 6082.

Finally, please note that you have been contacted as a registered consultee with Harrow Council's Planning Policy consultation database. Should you not wish to be contacted by the Council in relation to planning policy matters in future please email <u>ldf@harrow.gov.uk</u> to be removed from the database.

Yours sincerely,

David Hughes Planning Policy Manager Email: <u>ldf@harrow.gov.uk</u>

## Appendix 1B (Copy of email)

Dear Consultee

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The purpose of the draft SPD is to provide guidance to determine what would constitute a contextually tall building within suburban Harrow, and provide contemporary design guidance for buildings that are considered to be contextually tall (as defined in the SPD) or a tall building [as per the definition set out in Policy D9 (Tall buildings) of the London Plan (2021)]. Such guidance seeks to support and provide further guidance to policies in the current Harrow Local Plan (and any subsequent Plans) as well as the London Plan 2021.

The SPD provides guidance to assist in undertaking a context-based analysis to assist in determining if applications would reflect Harrow's character and context as identified in the Harrow Characterisation Study 2021. Contemporary design guidance is also provided to ensure that buildings that are either contextually tall or tall (as per the London Plan) achieve a high standard of design.

The SPD is intended to provide guidance and certainty to applicants, designers, developers, and residents with respect to the design of new development that proposes to increase height through a redevelopment or an increase in height to existing buildings. The Council is therefore seeking input into the draft document from stakeholders to shape its final form prior to adoption.

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Alternatively, representations can also be submitted by using the following methods:

- By email to: <u>ldf@harrow.gov.uk</u>
- By post to: Planning Policy Team, Harrow Council, PO Box 1358, Harrow, HA3 3QN

Any representations must be submitted before midnight **Monday 17<sup>th</sup> April 2023.** 

#### **Consultation Events**

The Planning Policy Team and colleagues will also be available online to discuss the draft Tall Buildings ('Building Heights') SPD at the following times:

- Wednesday 8<sup>th</sup> March 2023 between 6pm and 7.30pm
- Tuesday 21<sup>st</sup> March 2023 between 6pm and 7.30pm

For joining details for these events please see <u>https://talk.harrow.gov.uk/hub-page/planning</u>

For further information please contact the Harrow Planning Policy Team by emailing <u>Idf@harrow.gov.uk</u> or calling 077 3159 1724 or 0208 736 6082.

Finally, please note that you have been contacted as a registered consultee with Harrow Council's Planning Policy consultation database. Should you not wish to be contacted by the Council in relation to planning policy matters in future please email <u>ldf@harrow.gov.uk</u> to be removed from the database.

Yours faithfully

David Hughes Planning Policy Manager Harrow Council

## Appendix 1C (Copy of public notice)

#### PLANNING AND COMPULSORY PURCHASE ACT 2004 PUBLIC NOTICE INVITING REPRESENTATIONS DRAFT TALL BUILDINGS ('BUILDING HEIGHTS') SUPPLEMENTARY PLANNING DOCUMENT (SPD) Monday 27 February – Monday 17 April 2023.

Notice is hereby given that the London Borough of Harrow published a draft SPD and is inviting representations pursuant to Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

#### Title of the Document:

Draft Tall Buildings ('Building Heights') Supplementary Planning Document (SPD)

#### Subject Matter of the Draft Supplementary Planning Document

The draft Tall Buildings ('Building Heights') SPD sets out guidance to be applied across suburban Harrow, for schemes that seek to introduce development that is taller than the surrounding context within which it is proposed to be located in. It will provide detail as to what is considered a contextually tall building in a specific location, and contemporary design guidance to assist in achieving an exemplary design to either preserve or enhance the quality of the built environment.

#### Period of Consultation

The draft SPD will be the subject of a six-week period of formal public consultation from **Monday 27 February 2023** until **Monday 17 April 2023**. Details of consultation events can be found at <u>https://talk.harrow.gov.uk/hub-page/planning</u>

#### **Making Representations**

Comments should be submitted via the questionnaire at <u>https://talk.harrow.gov.uk/hub-page/planning</u> or in writing by midnight on **17 April 2023**, to:

Email:Idf@harrow.gov.ukPost to:Planning Policy Team, Harrow Council, PO Box 1358, Harrow, HA3 3QN

Please note that representations will be made publicly available. When submitting your representation, you may also request to be notified of the adoption of the Tall Buildings ('Building Heights') SPD.

#### Inspecting the Documents

The Draft Tall Buildings ('Building Heights') SPD can be downloaded from the Council's website: <u>https://talk.harrow.gov.uk/hub-page/planning</u> or is able to be viewed at the following address;

Greenhill Library Perceval Square College Road Harrow HA1 1GX

## **Appendix 1D (Online Consultation Event Feedback)**



## London Borough of Harrow: Tall Buildings Supplementary Planning Document (SPD) Consultation: Public Consultation events

## Summary of proceedings

## **Report by Public Perspectives**

## **Logistics**

### Date/Time:

- Wednesday 8 March 2023, 6:00 pm 7:30 pm
- Tuesday 21 March 2023, 6:00 pm 7:30 pm

Location: Via Zoom.

## **Objectives and Approach**

#### **Objectives:**

- Update on process, progress and key aspects of the proposed SPD.
- Discuss key aspects of the SPD to allow 'informed' consultation responses.
- Capture headline/high level views around the proposed SPD as part of the consultation process.
- Signpost to the on-line consultation questionnaire.

#### Audience:

- Local residents.
- Stakeholders including developers, property professionals and other interested parties.

### Promotion:

• Via councils' communication and consultation processes, including social media and online consultation. • Direct communication with key stakeholders on planning and consultation databases.

The sessions were facilitated on behalf of Harrow Council, by independent research and consultation organisation, Public Perspectives, who specialise in working with the public and charitable sectors, especially local authorities, including on planning related matters.

## Across the two events there were 16 participants, plus council and support staff.

Please note: The following provides details of the key themes/points raised in the panel discussion/Q&A, poll results and 'Chat'. This information complements other consultation activity and responses.

## Key themes, questions and comments

During the panel discussion/Q&A and through the 'Chat' function, the following themes, points or questions emerged:

- Participants generally welcomed the SPD, given the importance of tall buildings and perceptions of some negative local examples. They felt it would provide some clarity within the planning framework and help improve design and materials standards and help preserve the local context and character.
- This said, there were **some concerns about the impact of the SPD in practice**, its application and enforcement and whether it would stop the potential for tall buildings creep across Harrow.
- Similarly, there was some concern that if there are restrictions on heights, that this could lead to greater density in order to meet housing targets/requirements, with a need for balance required between height and density of developments.
- Relatedly, there was some interest amongst participants in more specific details and areas where a tall building is not appropriate in Harrow, albeit while appreciating the limitations of the SPD and that this is something which will be covered in more detail through the forthcoming Local Plan review and process.
- Similarly, some participants asked for more specific and stronger wording/language around design and material requirements to ensure higher development standards.
- There was concern amongst several participants that some of the images in the SPD are not good examples of tall buildings, especially in relation to Trinity Court. Some participants suggested seeking either more appropriate images or being clear about the specific point the image is intended to portray rather than risk being considered a good practice tall building in general.
- Some participants sought clarity about the definition of 'What is a tall building' and relationship to the 6 stories definition in the London Plan.
- Relatedly, some participants sought greater clarity about the definition of 'contextually tall'. This includes being specific that it relates to stories rather than meters.

- Some participants were concerned the SPD does not directly cover the Harrow and Wealdstone Opportunity Area, which could have implications for tall buildings both within the Opportunity Area and surrounding the Opportunity Area. This said, participants generally appreciated that the SPD will influence what happens in surrounding areas and how the Opportunity Area boundaries stich in with the character of the surrounding area.
- Some participants sought clarity about the role of the SPD, in terms of its weight and influence compared with a Local Plan/planning policy.
- Relatedly, some participants sought clarity about the relationship and linkages between the SPD and other related matters/documents/policies such as traffic, infrastructure and environmental policies.
- Some participants acknowledged and valued that planning decisions, including around heights, is a collaborative process between the council, developers and residents to get the balance right around quality, height, density, housing targets, and stay within the spirit of SPD and the local planning framework.

The following is a transcript of the anonymised (unless from a Council Officer) **'Chat'** from each of the sessions:

### Wednesday 8th March 2023

- **Participant:** Interested in council policy but suspect things are too late for the Kodak site?
- **Participant:** Can you please confirm that this presentation will be published so that people who can't attend this evening can see them, and include the link in the Council's next weekly email?
- London Borough of Harrow: The Kodak site is in the Harrow and Wealdstone Opportunity Area and would not be covered by the SPD. Additionally, you are correct, planning permissions are already in place for the Kodak site.
- London Borough of Harrow: Yes, we can add the presentation to the website for viewing by those who could not make it tonight or the second session on Tuesday 21/03/23 at 6:00pm. We can discuss with our Communications colleagues about a further article in the weekly email newsletter, linking to the consultation website / presentation.
- **Participant:** Several of the images and photographs in the current draft contradict text elsewhere in the document. Trinity Court in Marsh Road, Pinner is one of them. Para 3.3.5 acknowledges 6 storeys do not respect the character of Harrow's suburban areas and certainly not the character of Pinner.
- **Participant:** It reads 'In almost all instances, proposals that meet the definition of a tall building within Policy D9 of the London Plan (2021) (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 be supported.
- **Participant:** What is the force in 3,3,5 of "will not be supported"? will that stop all development of 6 storeys or more?
- London Borough of Harrow: As a material consideration the SPD (including 3.3.5) will assist in the Council in resisting such developments but as an SPD it cannot be said to definitely stop all such developments (as it cannot set policy, just supplement existing policies). The Local Plan review / new Tall Buildings Policy will ultimately be the strongest mechanism in that regard.

## Tuesday 21<sup>st</sup> March 2023

- **Participant:** Trinity Court is the most despised building Pinner so is a very poor example to use in the SPD.
- London Borough of Harrow: The Trinity Court precedent is intended to demonstrate the principle of locating height in sustainable locations such as town centres, rather than an exemplar development. It's inclusion in any final version of the SPD will however be reviewed based on feedback during the consultation period.

## Poll results

All participants that responded to the poll questions (7 – not all were asked or responded) agreed that the **Draft Tall Buildings ('Building Heights') Supplementary Planning Document (SPD) would provide clarity and certainty** for the preparation of planning permissions and / or developments that seek to increase height above the surrounding prevailing heights and that the **Draft Tall Buildings ('Building Heights') Supplementary Planning Document (SPD) will assist in ensuring that contextually tall or tall buildings will achieve exemplary design standards.** The results should be treated indicatively as a broad gauge of sentiment rather than conclusively and which complement the results from the consultation questionnaire, given the relatively small number of respondents and the nature of a 'poll' being a snapshot in time. Appendix 1E – (Consultation Response Spreadsheet)

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<b>Report for:</b>	Planning Policy
	Advisory Panel
Date of Meeting:	13 July 2023
Subject:	Updated Statement of Community Involvement (SCI)
Key Decision:	No – Advisory Panel
<b>Responsible Officer:</b>	Viv Evans, Chief Planning Officer
Portfolio Holder:	Councillor Marilyn Ashton, Deputy Leader of the Council, Planning & Regeneration Portfolio Holder
Exempt:	No
Decision subject to Call-in:	No
Wards affected:	All Wards
Enclosures:	Appendix A – Updated Statement of Community Involvement

## **Section 1 – Summary and Recommendations**

This report sets out the updated Statement of Community Involvement (SCI) as a replacement to the previously adopted 2012 version.

## **Recommendations:**

The advisory panel is requested to:

- A. Note and comment on the draft SCI and proposed changes;
- B. Note and comment on the intention not to formally consult on the document; and
- C. Commend the updated Statement of Community Involvement (SCI) to Cabinet for adoption, subject to any legal advice received in relation to not undertaking consultation.

Planning Policy Advisory Panel

## Reason:

It has been over 10 years since the Statement of Community Involvement (SCI) was last revised and adopted. The publishing of a new SCI facilitates Regulation 18 Consultation on the upcoming draft New Harrow Local Plan as it is good practice to ensure that the SCI is updated prior to launching such an extensive borough wide consultation.

## **Section 2 – Report**

## 1. Introduction

1.1 Section 18 of the Planning and Compulsory Purchase Act (2004) requires local planning authorities to prepare a Statement of Community Involvement (SCI). The SCI is a statutory document that sets out how the Council intends to involve the community in the planning process and engage with local residents, businesses and other interested parties when developing and reviewing planning documents and determining planning applications. This report recommends an updated version of the Council's current Statement of Community Involvement which was adopted in 2012.

## 2. Options considered

- 2.1 The option not to update the current SCI was considered but rejected. This is because SCIs should be reviewed every five years and the current SCI is over ten years old, necessitating an update. Additionally, the National Planning Practice Guidance (NPPG) indicates that local planning authorities may review and update their SCI at the same time as reviewing and updating a plan to reflect what action is taken to involve the community in any change to the plan.
- 2.2 Two options in relation to consultation on the draft updated SCI are addressed below.

## 3. Background

- 3.1 Harrow's existing SCI was adopted in 2012 following public consultation. It provides a commentary on the planning system and the objectives and principles of community involvement. There are further chapters relating to involvement in the Local Development Framework (LDF) (now referred to as Local Plans), the Development Management (DM) process, and a series of tables setting out the consultation techniques to be employed in the preparation of different types of planning document and for development control.
- 3.2 There have been many updates to the planning system since the publication of the last SCI including updates to the National Planning Policy Framework (NPPF), Planning Policy Guidance (PPG), and best practice standards for consultation. Another significant impact has been the Covid-19 Pandemic and its implications for in-person and online consultation methods.

## 4. Why a change is needed

- 4.1 The existing SCI contains content which is now out of date as it has been over ten years since the current iteration was adopted. It is good practice to update these documents to ensure their relevance to the community and renew the standards of consultation that they contain.
- 4.2 Additionally, the council has commenced drafting a new Local Plan that it intended to be adopted by December 2025. The council has already adopted a new Local Development Scheme (2023) which outlines the proposed timeline for drafting and adoption of the new Local Plan. Typically, an updated SCI accompanies the LDS as part of the suite of statutory documents required as part of the Local Plan process.
- 4.3 There have been no fundamental changes to the SCI as the statutory requirements for the document have not changed significantly. The content of the SCI itself will always follow government guidance.
- 4.4 A summary of changes from the adopted SCI to the newly drafted SCI will be published on the council's website to identify what changes have been made. The changes are as follows:
  - Identification of a 17-day re-consultation period for development management applications.
  - Updates to online consultation methods (MyHarrow Talk page).
  - Introduction of extenuating circumstances context paragraph (what we will do in a situation like the Covid-19 pandemic if we are unable to consult in person).
  - Updated names of statutory consultees and links to their webpages.
  - Changes to Neighbourhood Community Infrastrucutre Levy (NCIL) Consultation.
- 4.5 The SCI has been reviewed for compliance with the Council's new Communications Consultation Standards. The Corporate Communications Team has also reviewed and signed off the document.

## 5. Process considerations

- 5.1 As noted above, the Council intends to have the new Local Plan adopted by December 2025, as reflected in the Local Development Scheme (that sets out the key milestones for the Plan). The report to the Panel on the LDS identified this as a challenging timeframe. In this context, options for making the timeframes as efficient as possible are under constant consideration.
- 5.2 In relation to the proposed minor changes to the SCI, consideration has been given to whether it is necessary or beneficial to consult on these. While consultation on the SCI is typically considered good practice, it is not explicitly required in planning guidance ('There is no requirement for local planning authorities to consult when reviewing and updating their Statement of Community Involvement.' Plan Making Guidance Paragraph: 035 Reference ID: 61-035-20190723). As noted in above, the proposed changes are considered modest in their nature.
- 5.3 If the updated SCI was consulted on, this would be for a six-week period and would involve another round of meetings (this Panel and Cabinet) to report back

on the consultation and any changes to the document, prior to adoption. This would take at least three months and delay when the Council can undertake the Regulation 18 (initial) consultation on the draft Local Plan. Given the modest nature of the proposed changes, this is considered a disproportionate delay (and would also result in additional costs).

- 5.4 Further consideration is that the revised SCI reflects minimum standards for consultation (consistent with legislation) and options to go beyond that. There is nothing stopping the Council from exceeding the requirements of the SCI.
- 5.5 Given the above, it is proposed to proceed to present the draft SCI to Cabinet for adoption without undertaking consultation. The soundness of this approach will be discussed with Counsel, prior to the SCI going to Cabinet in September.

## 6. Ward Councillors' comments

6.1 None as the revised SCI covers all wards.

## 7. Risk Management Implications

Risks included on corporate or directorate risk register? Yes

Separate risk register in place? Yes (Local Plan Risk Register)

The relevant risks contained in the register are attached/summarised below. **Yes** 

The following key risks should be taken into account when agreeing the recommendations in this report:

Risk Description	Mitigations	RAG Status
If the recommendation(s) are not agreed, Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012 would not be facilitated and residents would not be notified that LBH is preparing a new Harrow Local Plan and that this is imminent	<ul> <li>Acceptance of the proposed recommendations in this report will mitigate risk</li> </ul>	GREEN
If the recommendation(s) are not agreed, the current SCI will continue to remain out-of-date and not updated for some 10 years	<ul> <li>Acceptance of the proposed recommendations in this report will mitigate risk</li> </ul>	GREEN

Risk Description	Mitigations	RAG Status
Harrow residents, businesses and other stakeholders are not being offered an opportunity to have their say on how they are engaged and informed on LBH planning processes lessening engagement and collaboration with them on planning decisions	<ul> <li>Public consultation on the SCI is not compulsory or specifically required by law</li> <li>The revised SCI reflects minimum standards for consultation which are consistent/compliant with relevant legislation and also incorporates options for engagement and collaboration that can be flexed to go beyond this level of consultation if required</li> </ul>	GREEN
The consultation arrangements set out in the SCI are not fit- for-purpose.	<ul> <li>The revised SCI reflects an evolution of the current SCI and has been updated to reflect current statutory requirements.</li> <li>The revised document has been reviewed by internal stakeholders (Development Management and Communications colleagues) and cross-checked with corporate consultation standards</li> </ul>	GREEN
The SCI is challenged due to a lack of consultation.	<ul> <li>Seek Counsel advice to ensure that there is no contravention with the NPPF.</li> <li>Planning guidance is very clear on the matter, it is not compulsory</li> </ul>	AMBER
The SCI is not endorsed for adoption by cabinet, causing delay to the Local Plan program set out in the Local Development Scheme (LDS).	<ul> <li>Seek endorsement from the PPAP and progress the SCI for adoption by Cabinet.</li> </ul>	GREEN

## 8. Legal Implications

8.1 Under section 18 of the Planning and Compulsory Purchase Act (2004) local planning authorities must prepare a statement of community involvement (SCI). The SCI is a local development document for purposes of Part 2 of the Act and by virtue of section 26 (1), the Council may at any time prepare a revision of all local development documents including the SCI.

## 9. Financial Implications

9.1 The cost of updating the SCI has been met from the Planning Policy budget. Any additional work required to finalise the document will also be met from this budget.

## 10. Equalities implications / Public Sector Equality Duty

10.1 The SCI has thoroughly addressed equalities implications by ensuring that everyone in the community has a way to be heard when the council embarks on the formal stages of Local Plan consultation (Regulation 18 – draft plan, and Regulation 19 – plan for submission), and within the day to day scope of the planning system.

## **11. Council Priorities**

Please identify how the decision sought delivers this priority.

1. A council that puts residents first

### 2. A borough that is clean and safe

11.1 The SCI is a statutory aspect of all Local Plan/Local Development Framework updates. Progressing the development of the updated Local ensures that residents are put first by facilitating discussions and ensuring that they are able to have their say on the future of the borough through this consultation. The Local Plan will also aim to deliver a borough that is clean and safe through planning policy.

## **Section 3 - Statutory Officer Clearance**

## Statutory Officer: Jessie Mann

Signed on behalf of Chief Financial Officer

Date: 26/06/2023

## Statutory Officer: Jimmy Walsh

Signed on behalf of the Monitoring Officer

## Date:

Chief Officer: Dipti Patel Signed off by the Corporate Director

## Date: 03/07/2023

## Head of Procurement: Nimesh Mehta

Signed by the Head of Procurement

Date: 03/07/2023

Head of Internal Audit: Neale Burns Signed by the Head of Internal Audit

Date: 28/06/20203

## **Mandatory Checks**

## Ward Councillors notified: NO\*, as it impacts on all Wards

## EqIA carried out: NO\*

Advisory panel report for information only

EqIA cleared by:

# Section 4 - Contact Details and Background Papers

**Contact:** Viv Evans, Chief Planning Officer, Viv.Evans@harrow.gov.uk

Background Papers: None

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London Borough of Harrow Planning and Development Statement of Community Involvement (SCI)

July 2023

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## 1 Introduction

### 1.1 Background

The London Borough of Harrow has experienced steady growth over the last decade, with incremental development being seen across the borough. A carefully considered approach to planning and development is essential to ensuring that Harrow retains its unique character and culture in the face of this growth. To make sure that we get our approach to planning and development right, we promise to work in consultation with residents, businesses, community groups, and other stakeholders, enabling everyone to have their say on the future of our Borough.

This Statement of Community Involvement sets out the ways in which the London Borough of Harrow pledges to consult stakeholders and empower them to engage meaningfully with the planning process. This includes the various stages of the planning application process and the preparation of statutory planning documents such as the Local Plan or Supplementary Planning Documents (SPDs).

#### 1.2 What is a Statement of Community Involvement?

The Statement of Community Involvement (SCI) sets out how residents, community organisations, businesses, key stakeholders and other interested parties, can be involved in planning and development within the London Borough of Harrow ("the Council").

The Council want people who live, work and have an interest in the borough to be proactively involved in planning its future. We are committed to ensuring that everyone has the opportunity to have an equal voice in shaping our places and spaces. We want to make it quicker, easier and more accessible for you to have your say in the planning process.

The Council is required to prepare<sup>1</sup> a SCI and review it at least once every 5 years<sup>2</sup> to ensure effective community involvement at all stages of the planning process. This SCI supersedes the previous version adopted by the Council in 2006 and updated in 2013.

New and innovative community engagement methods have been developed since the last SCI was adopted. For example, social media and online engagement platforms have created new ways in which the Council can engage with the community. This SCI has been developed to allow for greater flexibility and enable us to reach a wider audience.

<sup>&</sup>lt;sup>1</sup> Section 18 (1) of The Planning and Compulsory Purchase Act 2004 (as amended)

<sup>&</sup>lt;sup>2</sup> Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

## 2 Community Engagement

#### Harrow's Communities

Harrow is a diverse borough both culturally and ethnically and contains many different types of communities. Communities are often formed of groups of individuals from a specific neighbourhood or town however, they are not only limited to a specific geographical area. Communities may be formed of groups of individuals who share a similar interest, support a specific cause or share one or more characteristics. For example, age, disability, gender, race, beliefs, sex and sexual orientation.

#### The Rights of the Community

The Council seek to ensure that all communities within Harrow are provided with the following rights in respect of planning and development:

a. **Right to know.** Harrow's communities have a right to know if their environment is proposed for change, to know what the Council's planning objectives are for the borough and to know how the Council is performing.

b. **Right to Explanation**. Harrow's communities have a right to an explanation of the reasons why their environment is proposed for change, the reasoning behind the Council's decision making, and the reasons why it believes its plans are the most appropriate potential change.

c. **Right to Influence**. Harrow's communities have a right to influence how their environment is proposed to change, to expect the Council to listen to their views before acting, and to expect the Council to consider those views and, where appropriate, improve its plans and decisions accordingly.

#### Our Principles of Engagement

The Council are committed to ensuring that all of Harrow's communities can engage in the planning process, having the right and opportunity to have their voices heard. The following Principles of Engagement are related to planning and development and were designed to improve and support our engagement with Harrow's communities:

- 1. We will continue to adhere to legislative requirements, including relevant acts and regulations, in all planning matters.
- 2. Clear and non-technical information: We will strive to communicate and write planningrelated documents in accessible and direct terms, avoiding jargon.
- 3. Collaboration: We will pursue a collaborative approach to policy development and engage communities at the appropriate level in order to deliver the best outcomes for those whom we are here to serve.
- 4. Early Engagement: We will champion early engagement in planning matters, involving residents and other stakeholders. This will apply to both policy development and individual applications.
- 5. Variety of Methods: We will proactively engage with our communities using a variety of engagement methods. This will include online and in person activities, utilising the most direct and efficient methods possible.

- 6. Clear Expectations: We will set out clear expectations in relation to how we want applicants/developers to engage with our communities throughout the planning process. We want applicants/developers to actively seek the views of all communities affected by the development. By giving this clarity, applicants/developers can feel supported in bringing forward ambitious plans that will improve our local area.
- 7. Outreach and Accessibility: We will ensure that 'hard-to-reach' groups are engaged with including younger people, those with limited access to the internet, those who are linguistically diverse and those with disabilities.
- 8. Openness: We will keep records of consultation responses and prepare a Consultation Statement at the conclusion of Plan Making engagement phases. The Consultation Statement will summarise the process and results of the engagement, and will explain how the responses received have informed the council's decision making process.
- 9. Electoral Representation: We will invite elected representatives to meet with major development case officers, and applicants, at the earliest possible point in order to articulate their support or concerns for major applications at an early stage.
- 10. Privacy: We will treat all data submitted as part of consultation activities in line with the General Data Protection Regulations (GDPR) to ensure personal information is protected.
- 11. Unprecedented Events: If there are unprecedented events that stop or postpone forms of engagement or consultation run by the council, we will ensure clear communication and prioritise the health and safety of the community, while still complying with legal consultation requirements.

## 3 Community Engagement in the Planning Process

#### Community engagement in Harrow

The Council is committed to using a wide range of engagement methods and tools to pro-actively engage with communities and promote their inclusion throughout the planning process. This will continue to include traditional engagement methods as well as working innovatively with technology and the council's online engagement platform.

We recognise that traditional methods such as pop-up events, workshops and drop-in sessions can be invaluable to gain a local perspective and community input on shaping future development. However, relying solely on these methods results in the exclusion of many people, leaving them unable to engage with the planning process. This is because traditional methods can be time consuming, intimidating, time specific or difficult to access. As a result, events are often poorly attended and fail to engage with under-represented communities.

Some of these barriers can be overcome by using online digital technology alongside traditional methods. It allows us to provide real-time information, in a variety of formats and gather information quickly and more efficiently. Using innovative online methods allows communities to take part from any location at a time that works best for them.

Increased use of social media platforms such as Facebook, Twitter, Instagram and NextDoor has changed the way people communicate and obtain local information. They can be useful tools for the Council to utilise when seeking to connect with previously hard to reach groups. These groups are typically underrepresented in traditional engagement processes, meaning their views and needs aren't heard or fully considered. We will make use of digital technology as much as possible as an accompaniment to the traditional engagement methods.

#### Levels of Community Engagement

The Council will facilitate the most appropriate level of community engagement and exercise its decision-making duties. Harrow citizens are encouraged to make full use of their roles both as voters and members of the community by voting in elections and respecting the Council procedures through the examples provided in the table below.

Level of Participation / Community Empowerment	Process	Suitable Examples
Empowering / Ownership	Community has responsibility	Neighbourhood Plans
Collaborating / Partnership	Community recognised as a partner	Community Groups
Involving	Community involved in decisions	Local Plan / Masterplans / Regeneration

Consulting	Community asked for comments	Individual provides comments on a planning application
Informing / Awareness	Community given provided information / informed of a decision	FOI / Open / Evidence base / Publication of Information / Public Access

#### Digital Technology

#### Common Methods of Engagement

A range of potential engagement methods available to the Council are listed below, however the list is not exhaustive as more effective methods are continually being developed. Further detail on each of the following engagement methods is included at Appendix 2.

- Traditional written methods (Website, letters, emails and local press)
- Online Engagement Platform (MyHarrow Talk on Engagement HQ)
- Social Media (Facebook, Twitter, Instagram, MyHarrow Account)
- Face-to-Face (Public meetings, workshops and Citizens' Panels)
- Open Access (Public exhibitions, Open days, Drop-in sessions, Leaflets and Canvassing)
- Online meetings/workshops (Microsoft Teams / Zoom)
- Site Visits

Individuals and Communities can view all new planning applications online and can set up notifications for status updates on a specific application. Signing up to <u>LDF@harrow.gov.uk</u> will allow you to set up email notifications for Local Plan news and engagement.

You can also keep up to date with news and events in Harrow by signing up for our <u>My Harrow e-newsletter</u>. In addition, the Council publishes a free online magazine called <u>Harrow People</u> for all Harrow's residents and businesses.

## 4 Planning Policy and Plan-Making

#### What is Planning Policy?

Planning policies set out the strategic framework for development in Harrow and support the Council's long-term vision for the borough. They provide detail on how the Council will address issues across the borough including housing delivery, health and inequality, economic sustainability and the climate emergency. These policies are included in Harrow's Local Plan and are used to assess the acceptability of development and determine planning applications.

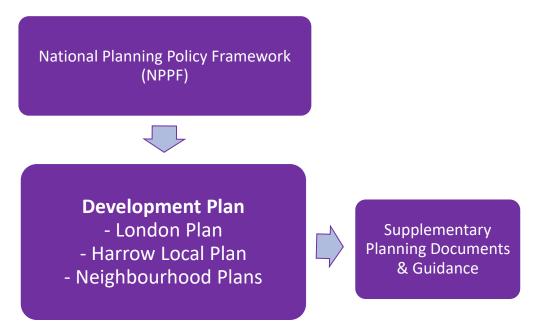
Things can change over time. Changes will occur economically, politically, environmentally and socially and therefore planning policy is always evolving to respond. Policy documents are informed by evidence and are monitored and reviewed regularly by the Council to ensure they remain appropriate and effective.

It is important that communities can engage with this stage of the planning process and are encouraged to make their voices heard. The following section sets out the different planning policy

documents which directly influence development in Harrow, and the stages of the preparation process you can be involved in.

#### **Development Plan**

The Development Plan is the group of planning policy documents that planning applications are assessed against. For Harrow, that includes the Local Plan (detailed below), London Plan (2021), and any Neighbourhood Plan(s). The Hierarchy of policy documents is shown below.



<u>The London Plan</u> is the Spatial development Strategy for Greater London, which is prepared by the Mayor of London. The current London Plan was published in 2021 and is subject to amendments, but is the basis for strategic polices across all of London. London Borough's Local Plans being brought forward shall be in general accordance with the London Plan (2021), and any subsequent amendments or versions of it.

Material Consideration	Development Plan	Local Plan Documents
National Planning Policy Framework (2021)	London Plan (2021)	Core Strategy (2012)
	Neighbourhood Plan (None in	Harrow Development
	Harrow presently)	Management Policies Local Plan
		(2013)
	Local Plan Documents	Harrow & Wealdstone Area
		Action Plan (2013)
		Site Allocations DPD
		Supplementary Planning
		Documents (SPDs)
		West London Waste Plan

## 5 The Harrow Local Plan

#### What is the Local Plan?

The Local Plan in this context refers to the Local Plan documents relating specifically to Harrow and excludes the suite of documents which make up the 'development plan' being the London Plan, Neighbourhood Plans and the Joint West London Waste Plan. However, the Local Plan is required to be in conformity with the London Plan and will need to acknowledge the other documents which make up the Development Plan.

The Council will ensure communities are engaged during all stages of the Local Plan making process. Appendix 2 outlines the different methods of community engagement that are likely to be used.

The Local Plan provides a framework for addressing important issues such as housing needs, economic sustainability, health and inequality, and the climate crisis. The documents also include mechanisms for delivery and monitoring, to ensure that the plans are being implemented and are effective in managing growth and development. The following documents form the current Harrow Local Plan;

- Core Strategy
- Site Allocations
- Adopted Policies Map
- Development Management Policies (DMP)
- Harrow & Wealdstone Area Action Plan
- Joint West London Waste Plan
- Neighbourhood Plans (if adopted, none at the date this SCI was adopted).
- Supplementary Planning Documents (SPDs) (https://www.harrow.gov.uk/planningdevelopments)

#### Local Development Scheme

The Council produces a Local Development Scheme (LDS) which sets out the programme for preparing planning documents for Harrow. It is regularly updated so communities can be aware of forthcoming opportunities to participate in the preparation of planning policy documents. We will ensure the most recent LDS is publicly available on the <u>Council's website</u> and can also be viewed at the Council's offices on request.

#### Key Stages of Local Plan Preparation

Stage	Engagement Opportunities	Council Commitments
Pre- Engagement	The Council will compile an evidence base, review the old Local Plan and Annual Monitoring Reports. This is done internally and provides the evidentiary foundation for engagement on new and updated policies.	We will ensure that the evidence base is sound and up to date.
Stage 1: Regulation 18	This is an options testing phase. Proposed policies will be detailed and based on evidence, but further comment is needed from the community and other stakeholders to	The Council will hold a minimum of 1x Regulation 18 consultation running for a minimum of 8 weeks. If the Council feels that more

	identify potential problems and to ensure the plan represents the needs and interests of all stakeholders. All Local Plan evidence base documents are publicly available and can be downloaded from the Council's Local Plan webpage.	community engagement is required, a second or third R18 consultation will be held. A Consultation Statement will be published detailing involvement, key issues and our response to issues raised.
Stage 2: Regulation 19	At this stage, a more complete draft of the Local Plan is published for further, more direct comment from stakeholders. Comments should focus on the legal compliance and soundness of the proposed plan – (defined as one that is positive, justified, effective, and consistent with national policy). Copies of the 'pre-submission' documents, and a statement of representations are made available for inspection. Community influence on the content is more limited in this stage. Representations are to confirm leal compliance with relevant legislation and requirements, rather than on addressing issues as done so within the Regulation 18 consultation phase.	The Council will hold Regulation 19 Consultation for a minimum of 6 weeks. All documents will be available online, at council offices and Greenhill Library and other appropriate locations such as libraries. A consultation statement will be published at the conclusion of the R19 consultation.
Stage 3: Regulation 22 (Submission of Plan)	At this stage, the Draft Local Plan is submitted to the Secretary of State (SoS) for independent examination. The inspector will consider all representations made during the previous consultation phases, including the Council's responses. Furthermore, the Inspector may invite further representations on specific issues, which will be considered as part of the examination in public.	There is no community consultation at this stage, but those signed up to the Local Plan newsletter will be notified. The announcement will be posted on the Council's website, consultation site and social media channels.
Stage 4: Regulation 24 (Examination)	An independent inspector will be appointed by the SoS to examine the Local Plan and make recommendations for any modifications needed to make the plan legally compliant and sound. A series of public hearings will be held on the topics included in the plan. The	The Council will advertise the dates and times of the hearings so that anyone who wants to attend can do so.

	hearings will be open to the public to watch.	
Stage 5: Regulation 26	At the conclusion of the public	If the modifications are
(Adoption)	hearings, the inspector may make recommendations for modifications before the plan can be adopted. If so, these will be consulted on in the same manner as Regulation 19.	accepted the plan can be adopted. We will produce an adoption statement, making it and the plan available to view online and in main Council buildings.

## 6 Neighbourhood Planning

#### What is Neighbourhood Planning?

The Localism Act, 2011<sup>3</sup>, provides rights and powers which allow local communities in Harrow to shape new development by preparing a neighbourhood plan<sup>4</sup> or Order. They are not prepared by the Council Neighbourhood Planning is a community led process, which are delivered by way of 'neighbourhood forums' composed of local community groups. These forums have the power to prepare neighbourhood development plans, that must be in general conformity with the strategic policies of the Local Plan, to be put to the wider community for approval by means of local referendum. As set out above, once adopted a Neighbourhood Plan forms part of the Local Plan and will be able to set out planning policies for the geographical area which it is designated to cover.

#### Forming a Neighbourhood Forum

A neighbourhood forum should be inclusive and open in the preparation of its neighbourhood plan or Order and ensure that the wider community:

- is kept fully informed of what is being proposed
- is able to make their views known throughout the process
- has opportunities to be actively involved in shaping the emerging neighbourhood plan
- is made aware of how their views have informed the draft neighbourhood plan.

For more information on neighbourhood planning, including information on how to set up a neighbourhood forum and start preparing a neighbourhood plan, please visit the following websites:

- <u>https://www.harrow.gov.uk/planning-developments/neighbourhoodplanning</u>
- <u>https://www.gov.uk/guidance/neighbourhood-planning--2</u>
- <a href="http://www.gov.uk/government/publications/localism-act-2011-overview">http://www.gov.uk/government/publications/localism-act-2011-overview</a>

#### The role of the Council

The Council has a duty to support those wishing to progress a Neighbourhood Plan in their area. However, the Council does not draft or resource the document, but will provide support which is set out within the regulations such as (but not limited to);

- Consult on (6 week consultation) and make a decision on the boundary of the area to be covered by a neighbourhood plan;
- Consult on and make a decision on applications to set up neighbourhood forums;
- Checking the plan prior to formal submission;
- Publicise a plan proposal;
- Organise the examination by an independent examiner into a neighbourhood plan (see below for further detail);
- Organise the referendum into the plan (see below for further detail); and
- Taking the adopted neighbourhood plan into account in planning decisions in the area.

Additional information can be found in Appendix 4.

<sup>&</sup>lt;sup>3</sup> https://www.legislation.gov.uk/ukpga/2011/20/contents/enacted

<sup>&</sup>lt;sup>4</sup> The Neighbourhood Planning (General) Regulations 2012

#### The role of the Forum

The Forum will play a primary role in the progression of the Neighbourhood Plan from initial designation to its adoption, with the role changing as the Neighbourhood Plan goes through the legislative process. The Council will assist the Forum as set out above. Prior to any submission of a neighbourhood plan boundary, the Forum shall consult the wider community through a range of methods.

#### Key Stages of Neighbourhood Plan Preparation

Step 1a: Community Group makes application to form a neighbourhood forum (Steps 1a & 1b can occur concurrently)	Council publicises and consults on the forum application for a minimum 6 weeks before a decision
Step 1b: Neighbourhood Forum makes application to designate a neighbourhood area	Council publicises and consults on the area application for a minimum 6 weeks before a decision
Step 2: Neighbourhood Forum prepares a draft plan or Order (Evidence gathering neighbourhood engagement, and assessment of Options)	Council provides technical advice and support including informal advice
Step 3: Pre-submission Stage - Publicity and 6-week consultation	Council publicises and facilitates consultation on the draft Neighbourhood Plan
Step 4: Submission Stage	Council notifies of submission
Step 5: Independent Examination	Council publishes details of Examination
Step 6: Referendum	Council facilitates and publishes results of the forum
Step 7: Adoption	Council notifies of adoption

## 7 Supplementary Planning Documents

Supplementary Planning Documents (SPDs) build upon and provide more detailed advice or guidance on specific Local Plan policies. An SPD may relate to a borough-wide issue or the development of a specific site or area. Whilst SPDs do not (cannot) introduce new planning policies or form part of the Local Plan, they are a material consideration in decision-making.

SPDs follow a different process to Local Plan documents, as they are not subject to an independent examination in public (EiP) by the Secretary of State. However, they are subject to consultation procedures for community involvement. The Council will engage with communities and provide them the opportunity to influence the development of new SPDs.

The diagram below outlines the key stages of SPD development and associated community engagement.

Stage	Engagement Opportunities	Council Commitments
Stage 1: Preparation	The Council will prepare an SPD where it is considered necessary to support or clarify a Local Plan policy. The SPD will be supported by local evidence and reflect the objectives of the Local Plan. The Council will publish the intention to produce an SPD on the Council's website and set up an online engagement platform, ask for comments.	The Council will prepare the SPD Consultation Strategy detailing opportunities for engagement, who is involved, and any comments made to date.
Stage 2: Draft SPD (Regulation 12/13)	A completed draft of the SPD will be published for formal consultation. Copies of all consultation material will be available online and at council buildings. Specific and general stakeholders will be contacted. We will consult for at least four weeks, and a further consultation statement will be prepared after the consultation is finished.	A completed draft of the SPD will be published for formal consultation. The council will consult for a minimum of six weeks in line with the Consultation Strategy. All Consultation materials will be available online and in main Council buildings. Statutory consultees will be engaged with. A consultation statement will be prepared after the consultation has concluded.
Stage 3: Second Draft SPD (if required)	Make amendments to the document and repeat Stage 2 if required.	
Stage 4: Adoption (Regulation 14)	The Council will decide whether it must produce a Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) to formally assess the environmental implications of an SPD. This is known as "screening". We will	Upon adoption of the SPD, the Council will prepare an adoption statement and make it available for the public to

consult the named "statutory bodies <sup>5</sup> " on our (SA/SEA) screening statement and will undertake a full SA/SEA if required.	and in main Council buildings
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<sup>&</sup>lt;sup>5</sup> The "statutory bodies" for SEA/SA are Historic England, Natural England and the Environment Agency.

## 8 Development Management

Development management is the process by which the Council determine planning applications for different types of development across the borough. In the determination of a planning application, the Council must take into consideration the development plan, the National Planning Policy Framework, National Planning Practice Guidance and other material consideration, which include consultation responses.

Legislation<sup>6</sup> sets out the Council's requirements for community engagement during the planning application process. We are committed to going beyond the minimum legal publicity requirements and promoting best practice.

The complete planning application process can broadly be broken down into the following four stages:

- Pre-Application Stage
- Planning Application Stage
- Decision Making Stage
- Appeal Stage (Only when required)

#### Pre-Application Stage

The pre-application stage is the voluntary opportunity for applicants to discuss proposal with the Council prior to formally submitting them for determination. The pre-application is not a predetermination of an application, rather it allows the Council to highlight certain issues that a scheme may have, highlight relevant policy and land constraint considerations. It also allows the opportunity to advise applicants if an application has little or no prospect of being successful. Engaging in preapplication is a paid service, which is borne by the applicant.

We expect the applicant to undertake community engagement communities at the pre-application stage. The table below sets out our recommended approach to community engagement, to be undertaken by the applicant at pre-application stage.

Pre-Application Stage (Community Engagement undertaken by the Applicant)		
Nature of Application	Recommended pre-application engagement	
Householder & Small business Development within the curtilage of a house (or a single flat) requiring planning permission. E.g. extensions, conservatories, loft conversions, dormer windows or small business premises (main property is up to 300m2)	Discuss proposal with neighbours and other nearby occupiers / owners of properties / land/ local interest groups (e.g. neighbourhood forums and residents' associations) at earliest possible stage in developing the proposal.	
	The use of the Council's pre-application advice service is encouraged.	
Minor development This is defined as: Less than 10 homes, including the change of use to flats Less than 1000 m <sup>2</sup> of non-residential floorspace	Discuss proposal with neighbours and other nearby occupiers / owners of properties / land/ local interest groups (e.g. neighbourhood forums and residents' associations) at earliest possible stage in developing the proposal.	

<sup>&</sup>lt;sup>6</sup> Town and Country Planning (Development Management Procedure) Order 2015

<b>Small Major developments</b> This is defined as: 10 - 24 homes 1,000 m <sup>2</sup> - 4,999 m <sup>2</sup> of non-residential floorspace	The use of the Council's pre-application advice service is encouraged. Discuss proposal with statutory bodies, neighbours and other nearby occupiers / owners of properties / land/ local interest groups (e.g. neighbourhood forums and residents' associations) at earliest possible
	stage in developing the proposal. Flyers/mail drop to interested parties. The use of the Council's pre-application advice service is strongly encouraged.
Medium Major developments This is defined as: 25 - 150 homes 5,000 m <sup>2</sup> - 14,999 m <sup>2</sup> of non-residential floorspace	Discuss proposal with statutory bodies, neighbours and other nearby occupiers / owners of properties / land/ local interest groups (e.g. neighbourhood forums and residents' associations) at earliest possible stage in developing the proposal. Public meeting with interested parties. Public exhibition and drop-in session in an accessible local venue. Publicise via website, local press, social media and flyers. The use of the Council's pre-application advice
Significant Major developments 151 or more homes 15,000 m <sup>2</sup> or more of non-residential floorspace or on a site of at least 2 hectares Waste development	service is strongly encouraged. Two rounds of consultation. Workshop/public meeting with statutory bodies, nearby occupiers, businesses, ward councillors and local interest groups (e.g. neighbourhood forums and residents' associations). Public exhibition and drop-in session in an accessible local venue. Publicise via website, local press, social media and flyers.
	The use of the Council's pre-application advice service is strongly encouraged.

For information on fees or to seek Pre-Application advice, please visit our webpage at <a href="https://www.harrow.gov.uk/planning-developments/planning-applications-advice-service">https://www.harrow.gov.uk/planning-developments/planning-applications-advice-service</a>

#### Planning Application Stage

The Council expects that applications will include a stakeholder consultation statement demonstrating that the views of the local community have been sought and taken into account in the formulation of development proposals. The level of detail provided should reflect the scale of the development.

Once a live planning application has been submitted, the Council will carry out the relevant consultation pursuant to the particular application. Each application has an initial statutory consultation period of 21 days. The methods of consultation include:

- **Neighbour Notifications** where required, notifications of planning applications will be sent to properties that are immediately adjacent to an application site and/or directly affected by an application
- Site Notices where required, a site notice will be put up nearby
- **Press Notices** where required, a public notice will be placed in the local press
- Council website information is displayed online
- **Designated Neighbourhood Forums** where an application is within a neighbourhood area the forum will be consulted
- **Residents Associations** residents associations will first need to register with us by demonstrating they are representative of their area. i.e. adhere to a constitution and membership reflective of the area. They will be consulted on applications as agreed

Where the council receives amendments to a planning application that has been submitted, a reconsultation will be launched allowing 14 days for comments to be submitted.

Application Submitted - summary of requirements				
Nature of Application	Website	Site Notice	Newspaper Advert	Consultation Letter Recipients

<ul> <li>A. Major applications †</li> <li>B. Departures from the Development Plan</li> <li>C. Any application affecting a public right of way or footpath/way (but excluding pavement crossovers, new/revised vehicular or pedestrian accesses)</li> <li>D. Development where the application is accompanied by an Environmental Statement</li> </ul>				Occupier(s) of the application property. Owner/occupiers of land which has a common boundary with the application site and those close by; the extent will depend on the nature and scale of the proposal. Where relevant, neighbourhood forums and residents' associations
E. Any planning applications (either for development or demolition) that would affect the character or appearance of a Conservation Area				
Minor applications* where criteria B to E do not apply	✓	Only if within conservation Statutory Lis or affecting t of a Statutor Building	n area; ted Building; the setting	

A more detailed summary of the consultation process at planning application stage is included in Appendix 1. Anyone wishing to be notified about planning applications can register online. Further guidance on how to register and comment on an application can be found on <u>this webpage</u>.

<sup>+</sup> 10 or more homes, or on a site of at least 0.5 hectares; 1,000 m<sup>2</sup> or more of non-residential floorspace or on a site of at least 1 hectare; waste development

 $\ast$  Less than 10 homes, including the change of use to flats; less than 1000  $m^2$  of non-residential floorspace

	Application Submitted				
Application Type	Website	Site Notice	Newspaper Advert	Consultation Letter Recipients	
Applications for Listed Building Consent	•	<b>√</b>	•	Dependant on the scale and potential impacts of the proposed development. Where relevant, neighbourhood forums residents' associations, statutory consultees	
Advertisement consent within a conservation area, a Statutory Listed Building, or affecting the setting of a Statutory Listed Building	<b>√</b>	✓	✓	As above	
Applications to remove or vary conditions	✓	X	X	Notify anyone who made comments on the original application.	
Approval of details reserved by condition	$\checkmark$	X	X	×	
Reserved Matters Application	As appropr	iate.	I		
Work to trees in conservation areas and TPOs	<b>√</b>	<ul> <li>✓</li> </ul>	×	The owner or occupier of the land on which the tree stands will be consulted.	
Advertisement consent – on shop fronts or business premises	✓	$\checkmark$	×	×	
Advertisement consent - hoardings on flank walls and boundaries	✓	<ul> <li>✓</li> </ul>	×	×	
Prior Approval - telecommunications	$\checkmark$	$\checkmark$	×	$\checkmark$	
Prior Approval - other	<b>√</b>	×	×	Only in relation to larger extensions built under the increased permitted development rights.	

Certificates of Lawfulness	$\checkmark$	×	X	×	
Revisions to applications	made, we winecessary. In assessment following co were objecti stage substa enough to ju are the prop did earlier vi are the issue concern to p	ill decide when n deciding when set out in Plan nsiderations n fons or reserva ntial and, in th istify further p osed changes ews cover the es raised by th parties not pre considered that or responses v	ther further ether this is r aning Practice hay be relevan ations raised he view of th publicity? significant? significant? sissues raised e proposed of viously notificant t re-consulta	in the original consultatio e local planning authority, d by the proposed change: hanges likely to be of	ne he n ,

#### **Decision Making Stage**

Following the end of the consultation period, we consider material planning considerations received through consultation responses and make a decision on the planning application having regard to development plan policies and all other relevant material planning considerations. Some applications are decided by planning officers using authority delegated by the Council. The officers report includes a summary of comments received, the Council's response to them, and the reason for the decision. This is made available on the Council website.

The Constitution sets out which proposals will be decided by Planning Committee. Generally larger scale and /or particularly sensitive or controversial development proposals go to planning committee. This is a public meeting with the opportunity for members of the public to speak by prior arrangement. Any comments and objections will also be summarised in a publicly available report submitted to that meeting. Elected members of the planning committee will be presented each relevant case by the planning officer, hear from objectors (who registered to speak), the applicant and then vote on the application for approval or refusal.

The decision notice to approve or refuse planning permission for any application will be published online.

#### Appeal Stage

The applicant has a right to appeal where they disagree with the decision of the local planning authority to refuse planning permission, to a condition attached to a consent, or where a decision is not reached within the statutory time period. Where an applicant chooses to appeal a decision, the Planning Inspector acts as an independent decision-maker When we have been notified of an appeal by the Planning Inspectorate, we will notify all interested parties of the appeal and provide a copy of all comments made on an application to the Inspectorate. Interested parties are advised of how they can be involved in the appeal process.

If an appeal is to be considered at an informal hearing or public inquiry, we will also notify all interested parties of the venue and time of the hearing in line with the Planning Inspectorate's requirements. The venue will be accessible and inclusive.

Please note that should a householder application become the subject of an appeal dealt with by written representation, there may be no opportunity under the fast track Householder Appeal Service procedure to make further comment at the appeal stage. Comments received at the application stage will be forwarded to the Planning Inspectorate.

#### Submitted Planning Applications - Having Your Say

The process for submitting comments on applications is necessarily formal, given the need to determine applications in a timely manner. Therefore, the following requirements apply to anyone wishing to comment on an application:

- Guidance on how comments can be made on planning applications can be found at; <u>https://www.harrow.gov.uk/planning-developments/commenting-planning-applications</u>
- All comments must be received in writing within the consultation period (normally 21 days)
- Comments can be submitted by email, letter or online with all contact details set out at <u>https://www.harrow.gov.uk/planning-developments/commenting-planning-applications</u>
- Late comments will be considered where circumstances allow. Comments received outside the formal consultation period may not be able to be taken into account, depending on the stage of which the assessment, reporting and determination of the application has reached.
- Personal information (respondents signature, email address and phone numbers) as part of an objection will be redacted and not made publicly available. The content of the objection will be publicly available. The Council will follow any relevant requirements of privacy legislation.
- Petitions are able to be submitted in relation to any planning application that is publicly advertised. The Council will accept these and publish under the details of the petition organiser. Future correspondence regarding the application will be sent to the petition organiser.

Please note that only Planning Considerations will be taken into account, such as (but not limited to);

- Local Plan policies compliance
- site specific issues such as overlooking, loss of light, loss of outlook, loss of privacy.
- transport problems
- layout and design, impact on the character of the area

Whilst the above points are able to be considered as part of comments to a planning application, it is important to note the Council is unable to take other matters into consideration, as they are outside of planning legislation. Such considerations include (but not limited to);

- Potential impacts on property values
- Boundary disputes
- Loss of a view
- Construction noise (dealt with by environmental health legislation)
- Foundations and sewerage (dealt with by building regulations)

#### Where We Won't Consult

Planning Services will not consult on the following types of applications:

- Certificate of lawfulness of proposed use or development
- Details pursuant to conditions
- Non-material minor amendment applications

This is because they are assessed against legal tests set out in planning legislation. There is no scope to take into account representations when making the decision on these types of applications.

#### Planning performance Agreements (PPAs)

We strongly encourage a collaborative approach to important developments using <u>Planning</u> <u>Performance Agreements (PPAs</u>). These are generally used for large scale developments but can also be used for smaller scale schemes depending on the detail of it. They encourage joint working between the applicant and the Council and can help bring together other parties such as statutory consultees and local residents. They are also useful in setting out an efficient and transparent process for determining applications. All PPA's would include a community engagement strategy, the detail of which would be proportionate to the development to which it relates.

# 9 Other Policy Documents

Community Infrastructure Levy (CIL) Charging Schedule	The Community Infrastructure Levy (CIL) Regulations allows the Council to set charges which developers must pay when bringing forward applicable developments within the borough. The CIL contributions received by the Council are used to fund the provision, improvement, replacement, operation or maintenance of infrastructure needed as a result of development (i.e schools, transport schemes, health facilities, open space and sports facilities). The CIL Charging Schedule is available to download from the Council's CIL webpage and can be viewed at the Council's offices upon request. The process for producing a CIL charging schedule is set out in legislation. The setting of charges is based on technical evidence of viability and therefore the public consultation tends to be more formal. Relevant details of CIL Charging
	Schedule reviews/updates will be made public on the Council's CIL webpage and will be publicised using social media if considered appropriate. Link to CIL page: <u>https://www.harrow.gov.uk/planning-</u>
	developments/community-infrastructure-levy
Neighbourhood Community Infrastructure Levy (NCIL)	At least 15% of Harrow's CIL money will be reserved for Neighbourhood CIL allocation. This money must be spent on projects that take account of the views of the communities in which development has taken place and supports the development of the area in which the CIL is generated. The percentage is more (25%) if there is a neighbourhood plan or a neighbourhood development order in place.
	The CIL Regulations (2010) state that the views of the community should be reflected in the allocation of NCIL, therefore twice-yearly community engagement will be undertaken to identify potential projects from community members.
Article 4 Directions	Developments that do not require planning permission are outlined in the General Permitted Development Order (GPDO) 2015. An Article 4 direction is a mechanism by which a Council can remove these permitted development rights. They allow us to control what does and does not need planning permission. Article 4 directions can only be introduced where it meets the necessary legal test. The Council will follow the minimum statutory consultation requirements as set out in Schedule 3 of the GPDO.
	Current Article 4 Directions can be viewed on the Council's website: <u>https://www.harrow.gov.uk/planning-developments/adopted-policies-map</u>
Conservation Area Appraisals and Management Strategies (CAAMS)	A Conservation Area Appraisal describes the special character and appearance of a conservation area and its historic and architectural significance. As such, it is a document which not only informs but which can also help shape planning decisions within the area. The Management Strategy builds on and responds to the appraisal and informs future development to ensure that it is specific to the needs of the conservation area and conserves the special qualities.

The Council will engage with local residents, residents' associations and conservation societies in the process of producing a new draft conservation appraisal or management plan.
Current Conservation Area Appraisals and Management Strategies (CAAMS) can be viewed on the Councils website: <u>https://www.harrow.gov.uk/planning-developments/biodiversity-conservation</u>

## 10 Further Information

#### **Contact Us**

- 6.2 If you have any comments about either Local Plans or Planning Applications, you can do this by contacting us directly. Our details are:
  - For Local Plan queries please email ldf@harrow.gov.uk
  - For Planning Applications and Pre-Application advice please email planning.applications@harrow.gov.uk
  - Contact us by letter: Planning Services, 1 Forward Dr, Harrow HA3 8NT

#### **Planning Information**

- 6.3 Excellent sources of information about planning are the Government website, Planning Portal and the Royal Town Planning Institute.
- 6.4 The Government websites contains National Planning Practice Guidance on a number of planning topics as well as a cross reference to the national planning policy in the form of the National Planning Policy Framework.https://www.gov.uk/government/collections/planning-practice-guidance
- 6.5 The Planning Portal is the Government's online planning and Building Regulations resource for England and Wales. It provides information on plans, appeals, applications, contact details and research areas <a href="http://www.planningportal.gov.uk">http://www.planningportal.gov.uk</a>
- 6.6 The Royal Town Planning Institute (RTPI) aims to advance the science and art of planning for the benefit of the public, and contains many useful guidance notes <u>http://www.rtpi.org.uk</u>

## Appendices

Appendix 1 – Methods of Community Engagement

#### **Methods Explained**

#### Public Roadshows

These have been the traditional method of informing and receiving comments and feedback from the public and have been very effective over a long period. They are an on open invitation to members of the public to attend meetings at specific venues at a given time to engage directly with Council Officers. The time and the venue must be carefully selected to ensure that people are able to attend and that the venues are suitable. The Council will ensure that this method of engaging the public continues.

#### Focus Groups

These are typically made up of local people or people with specialist knowledge or interest in a particular planning issue. Focus groups need not be representative of the general population and are primarily used to focus discussions / decisions around a specific topic or place. The Council also uses focus groups in pre-consultation to help identify issues that the wider public may wish to address through the formal consultation process.

#### Community Surveys/Questionnaires

This is an effective way of providing and collecting information when a large number of people need to be engaged. Questionnaires can be used to ask residents and other stakeholders to give their preferences and comments on, for example, what they see as key issues and priorities. This technique should be combined with other forms of engagement such as public roadshows and care must be taken to ensure that issues are clearly stated to avoid confusion or misinterpretation.

#### Public Exhibitions

These are usually in the form of information put on public display for examination and observation so that people can provide comments and input to Council proposals. Such exhibitions could be sited at appropriate locations and manned by professionals and officers capable of explaining detailed proposals and answering questions. The location and time of exhibitions must be appropriately advertised and a clear explanation given of any detailed plans and supporting documents that will be available.

#### Media Coverage/Briefings

Press releases, TV and Radio etc can be effective ways of disseminating information. Other methods such as newspaper articles, advertisements and press briefings are effective for making local people aware of local issues and consultations. The Council will take advantage of these at different stages in the preparation of each Local Plan document. This medium will be particularly important at stage one of the statutory consultation process and when any of the Council's plans are being agreed for submission to the Secretary of State. Radio and TV are recognised as having the potential to reach a significant number of people and their use will be considered where appropriate.

#### Summary Information

To ensure that the whole community is informed at key stages of the plan's preparation, the Council will publish and distribute, in both electronic and paper form, newsletters that will explain the Local Plan process and set out progress in the preparation of Local Plan documents. Articles will be placed in the local press and the Council's own magazine (Harrow People).

Appendix 2 – Potential methods for Community En	ngagement (Local Plans)
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Method	Advantages	Disadvantages	Costs involved
Letters or emails to statutory bodies and individuals	Reaches a wide audience of people inexpensive. Can be used to invite views and explain the Council's view and rationale for a certain position.	May not reach those with reading difficulties.	Low
Online Engagement Platform (MyHarrow Talk - Engagement HQ)	Provides a full cycle engagement program. Informs stakeholders about the project, provides a range of engagement methods (Survey, Ideas, Map, etc), provides links to all necessary documents, timelines, contacts, events, etc. Has a sign up button so that visitors can stay informed about the project when it is updated. Can be kept online after the consultation closes so that respondents can refer back to materials and the council can post updates and feed back on what was heard. Links to the page can be provided through email, social media, letters & site notices (QR Code), council websites and newsletters.	Requires internet and computer literacy to connect.	Low - Annual fee – utilised by the whole council.
Public Exhibitions/ Open Days/Road Shows	Opportunity to inform people about proposals and projects. Options can be clearly set out and presented all at once. Exhibitions can be moved between	May only reach audience with interest in that topic. Information flow is largely one-way, though feedback can be requested (e.g. book to	Low - cost of hiring the venue, and staff time setting up the exhibition.

Method	Advantages	Disadvantages	Costs involved
	locations for maximum targeting. Can be used to generate feedback on a topic	record comments, self- administered questionnaires).	
Council websites (internal) and the public website)	Easy means of referring people to information in a short period of time	Extent of internet access in the borough will be an issue.	Low
Microsoft Teams / Zoom Workshops (Online)	Opportunity to inform people about proposals and projects. Options can be clearly set out and presented all at once. Can be used to generate feedback on a topic.	Not everyone has access to satisfactory internet, computers, or software. Some people not comfortable engaging online, preferring to attend a physical exhibition.	Low
Council Magazines and Publications e.g. 'Harrow People'	Reaches a wide range of residents. Useful when needing to broadcast information and gives people an opportunity to respond.	Extent of readership may be limited. May not reach non- residents of the borough.	Low
Leaflets, Newsletters	Coverage is potentially wide, reaching residents and non-residents. Can be used to invite views. Can be high profile publicity.	Can generally give limited information. May result in a poor response. Information flow is largely one-way, although can inspire debate amongst residents. May not reach those with reading difficulties	Medium
Local press briefing and public notices	Information can be provided in some detail.	Not definite that a story will get in the press. May not reach those with reading difficulties.	Medium
Consultative documents requesting public comments	Clear statement of purpose and reasoning should be apparent. Anyone can respond. Amenable to process on the web.	Relies on initiative of responders. Responses not likely to be representative of all opinion/interests. Can be hijacked by dominant and more resourceful individuals and organisations. May	Medium / high - costs of publishing the documentation and administering the distribution and feedback process. Costs reduced if the

Method	Advantages	Disadvantages	Costs involved
		not reach those with reading difficulties.	process is done on the web.
Public meetings (online or in-person) with displays	Combines the advantages of exhibitions with more informed discussion and opportunity to comment. Involves, informs and empowers the local community. Can involve different language groups using interpreters.	Relies on those who attend to comment, and hence can sometimes be unrepresentative. May only attract those with negative views. Many do not feel able to participate, as can be hijacked by more dominant and resourceful individuals. Size is limited by venue	Medium
Workshops and seminars (online or in- person)	Opportunity for stakeholders to make their opinion heard in a public debate. Encourages active citizenship. Encourages participants to develop a stronger and more relaxed working relationship. Can involve different language groups using interpreters.	Depends on stakeholders to take part.	Medium - cost of hiring appropriate facilities for period of the workshop.
Surveys/ Questionnaires (online or in-person)	Good sampling technique should ensure that all shades of opinion are canvassed and captured. Can be geographically focused in terms of neighbourhoods, town centres, and open space. Can be used to reach particular target groups.	Can appear to be remote; while it captures public opinion, it does not necessarily capture opinion or the interests of institutions, corporate bodies and developers etc. May not reach those with reading difficulties.	Medium - skilled exercise which should be undertaken by trained staff or professionals. Can be low or medium expensive.
Focus groups and discussions	A participatory approach, which can explore views on specific issues. A two- way process which gives clear encouragement to contribute ideas and views. Can be used to	Can be very time consuming, and relies on good-will of respondents. Ultimately the group's views are only as representative as the group itself, i.e. selection of the group is	Medium - more costly if data is examined by a Consultant

Method	Advantages	Disadvantages	Costs involved
	reach a target audience and those that do not respond to traditional forms of consultation. An opportunity to explore the factors which support an individual's opinion. Good for sensitive subjects where individuals may not respond to a structured questionnaire/ group discussion. Can involve different language groups using interpreters.	very important. Cannot be used to extrapolate results for the whole population. Requires skilful facilitation	
User panels and representative groups e.g. Conservation Area Advisory Committee (CAAC), Planning Policy Advisory Committee (PPAP)	Provides a platform that is stable, can be very knowledgeable (representative groups) and gives a sense of involvement. Can be used to address more technically complex issues.	Where volunteers are being used, there is a need for frequent replacement.	Low/ Medium
Participatory forums/Community forums	Provides the opportunity for participation in the process and procedures of planning. Strong two- way process.	Strong personalities may dominate proceedings	Medium
External Consultants	Can provide specialised and focused facilitation for engagement events. This can allow for new and innovative engagement techniques to which participants respond more constructively.	May play a limited role in the consultation process and a very specific approach may not fit with the consultation aims.	High
Councillor and MP surgeries	Local residents and groups have access to elected representatives.	There may be some disappointment as it is not always possible for Councillors and MPs to intervene in the planning system in the way that their	Nil

Method	Advantages	Disadvantages	Costs involved
		constituents might want because they must operate within the confines of planning law/policy	
Local amenity, tenant and other groups	They have a wealth of local knowledge and play a vital role in expressing the concerns or needs of the local community.	They do not necessarily speak for all of the community as there is often more than one view on a development or proposed plan.	Nil

## Appendix 3 – Categories of Planning Applications

Application Category	Development Type	Thresholds
Major Applications	Residential	10 or more new homes
		0.5 ha site area
	Non residential	1,000m <sup>2</sup> or more floorspace
		1.0 ha site area
	Change of use	Any change of use or conversion within the above major categories
	Waste	Any development designed to be used wholly or mainly for the purposes of treating, storing, processing or disposing of refuse or waste materials
	Approval of details	Where the details fall within the above major categories
	Variations of a permission	Involving building works within the above major categories
Minor	Residential	1 to 9 new homes
Applications	Non residential	Less than 1,000m <sup>2</sup> floorspace
		Less than 1.0 ha site area
		Alterations within the curtilage of non-residential properties
	Change of use	Any change of use or conversion not within the above major categories and including alterations/extensions requiring planning permission
	Variations of permission	Involving building works within the above minor categories

Application Category	Development Type	Thresholds
Other	Change of use	Any change of use or conversion not within the above major categories and not including alterations/extensions requiring planning permission
	Special consents	Advertisement consent
		Certificate of lawfulness applications
		Listed building applications
		Conservation area consent applications
		Consultations from neighbouring authorities
		Prior approval notifications
	Variations of permission	Involving change of use within the above major and minor categories
Householder	Householder	Any householder extensions/alterations
	development	Any householder outbuildings/garages
		Any householder hardstandings/vehicular accesses
		Any householder swimming pools
		Satellite dishes on domestic properties

### Appendix 4 - Neighbourhood Planning: Advice and assistance policy

#### General support:

- General guidance the Council will prepare and maintain a Neighbourhood Planning Protocol, outlining what neighbourhood planning is, the various stages involved, and the roles and responsibilities.
- Harrow Council neighbourhood planning webpage
- Frequently Asked Questions on neighbourhood planning (on the neighbourhood planning webpage)
- Advise local communities interested in neighbourhood planning at an early stage to help them decide whether a neighbourhood plan is suitable for their ambitions
- Disseminating information on local case studies on the website (as these emerge)
- Signposting to relevant external resources

#### Support to forums preparing neighbourhood plans and neighbourhood orders:

The London Borough of Harrow will subject to resources provide the following in-kind assistance:

- Provide an initial meeting with neighbourhood forums to set out the general and specific level of support that can be provided
- Subject to officer availability, attendance at briefings and meetings to provide advice (e.g. on consultation and engagement) and mediate if required
- Electronic maps of your neighbourhood area and relevant planning designations (pdf, print outs or GIS maps)
- Information on planning designations and planning policies for the area
- Guidance on conformity with national and local strategic policies
- Assistance, where relevant, with carrying out the Strategic Environmental Assessment, and if required, a full Sustainability Appraisal and Habitats Assessment.
- Guidance in designing community consultation activities on planning issues
- Assistance with the identification of the statutory consultees
- Subject to officer availability, support for community planning events (e.g. facilitation, feedback, presentations)
- Provide advice on who to consult in relation to additional requirements for a neighbourhood development order

#### PLEASE NOTE:

The above assistance will be subject to demand and available resources. The Council will expect community groups/neighbourhood forums to give ample notice to allow the Council to respond to any requests in the most helpful way. There will not be any funding for neighbourhood forums from the London Borough of Harrow; however, we will do our best to advise you on any potential funding opportunities and where you can get further help and advice.

Advice and support provided by the London Borough of Harrow is done so without prejudice and cannot be considered to be binding on the Council when it subsequently carries out its formal duties under the Act, such as determining applications to designate a neighbourhood area or forum, or determining legal compliance prior to publishing a draft plan etc.

The requirement under the Act for Local Planning Authorities to provide advice and support should not be construed as an obligation for the Authority to agree with proposals made by the neighbourhood forum. Where the Local Planning Authority is required to make a formal decision (i.e. determining applications to designate a neighbourhood area or forum, or determining legal compliance prior to publishing a draft plan etc), the Council will have regard to the relevant legislative requirements and the National Planning Policy Framework / National Planning Practice Guidance.

### Appendix 5: Statutory and Non-statutory Consultees

As defined by the Town and Country Planning Regulations (2012) as amended.

- <u>The Environment Agency;</u>
- Canal and River Trust;
- Forestry Commission;
- <u>Historic England;</u>
- <u>Natural England;</u>
- The Mayor of London;
- The Civil Aviation Authority;
- Homes England;
- <u>Sport England</u>;
- <u>NHS</u>;
- The Office of Rail and Road Regulation;
- Transport for London;
- Each Integrated Transport Authority;
- Each highway authority within the meaning of section 1 of the Highways Act 1980 (including the Secretary of State, where the Secretary of State is the highways authority); and
- The Marine Management Organisation.
- Neighbouring Local Planning Authorities (Barnet Council, Brent Council, Ealing Council, Hillingdon Council, Three Rivers Council, Hertfordshire Council Hertsmere Council, Watford Council)
- The bodies prescribed for the purposes of section 33A(9) of the Act are each local enterprise partnership.
- In this regulation "local enterprise partnership" means a body, designated by the Secretary of State, which is established for the purpose of creating or improving the conditions for economic growth in an area.

The Council also consults with a number of other organisations and individuals who are also included on the Planning Services Database. These include:

- Local Residents
- Local Strategic Partnership
- Voluntary organisations
- Civic and amenity groups Religious organisations
- Disability groups
- Local Businesses
- Land owners in the Borough and local agents
- Essential Service Providers (Fire, Ambulance other Council departments)
- Conservation Area Advisory Committee

The Council will seek to engage with groups representing the nine protected characteristics under The Equality Act: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.