

1 Resident 1	Harrow should adopt a definition of tall buildings. I think that should be > 5 stories.	A tall building definition is unable (legally cannot) adopt a tall building definition. This will be considered as part of the Local Plan Review.	No amendment considered necessary
	12 stories should be the maximum for new tall buildings in Harrow	A building maximum height is unable (legally cannot) to be imposed on developments. Each application must be considered on its own merit.	No amendment considered necessary
	Harrow should allow tall buildings in strictly designated areas only.	A tall building designated area is unable (legally cannot) adopt a tall 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. These 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 exceed the height of a pre existing building or 12 stories whichever is lower.	A tall building designated area is unable (legally cannot) adopt a tall 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. Any building exceeding 5 stories must give back to Harrow through funding new infrastructure within the Borough.	Officers consider that the approach within the SPD allows for flexibility and heights to be relative to the context and character of an area. All development that result in new floorspace (with some exceptions) must pay Community Infrastructure Levy, 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 developments to encourage.	The SPD seeks to provide guidance for contextually tall, and tall buildings. However, the Council encourage a mix of housing types to allow for housing choice.	No amendment considered necessary
	Buildings taller than 3 stories outside of the areas designated for tall buildings should be designed to avoid overlooking private gardens and must not disturb existing parking arrangements and capacity (creating capacity as needed).	Design Principle D2 (Overbearing & overlooking) provide guidance to address overlooking, with Design Principle D5 addressing Transport & Parking. However, parking provision is addressed by the London Plan (2021).	No amendment considered necessary
	Building finishes should be free of cladding and concrete where used should account for 50% maximum of visible finish. Traditional 'yellow' London brick should be encouraged.	The SPD provides guidance to material & detailing through Design Principle E3, specifically noting that an assessment of contextual 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 retardant materials. All tall buildings should have a fire escape plan approved by LFB.	All planning applications are required to be supported by a planning statement, with more scrutiny and requirements for taller buildings.	No amendment considered necessary
	Buildings should be well insulated and be specifically considerate of hot summer weather. They should have effective heating with a low carbon footprint.	The SPD provides guidance on insulation through Design Principle F2 (Passive design). Policies also within the wider development plan also address such matters.	No amendment considered necessary
	Increases in housing capacity should be accompanied by expanded infrastructure - schools hospital GPs roads buses trains etc.	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 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	

2	Resident 2		No more tall buildings please. Look how they changed the atmosphere and architecture of Ealing. Please don't do that to Harrow	The SPD does not set a policy for or against tall buildings. However, it 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	Infrastructure:	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 cater for new development.	No amendment considered necessary
			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.	The SPD refers to private amenity sapce (Desgin Principle D4), and notes that all spaces should comply with London PPlan (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.	No amendment considered necessary
			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.	The SPD provides guidance on how family sized homes should be addressed within contextually tall and / or tall buildings, as these are 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.
Viability:	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 and really affordable homes.	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 able to be influenced through this SPD.	No amendment considered necessary		

Land owned by public bodies	<p>Land owned by public bodies like TFL, or council owned land should be used for council housing rather than for sale to developers. The use of car parks attached to rail or underground stations should be 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.</p>	<p>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.</p>	No amendment considered necessary
Climate Crisis	<p>The climate crisis makes it imperative that every scheme should be designed to Passivhaus standards, and should be environmentally sustainable, using the latest methods and technology, and examples of schemes that fulfil these standards.</p>	<p>The SPD provides guidance on such matters though Design Objective F (Sustainable and climate friendly design). However, there are policies within the wider development that address this matter.</p>	No amendment considered necessary
General Overall Document	<p>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 into 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.</p>	<p>Noted</p>	No amendment considered necessary
	<p>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.</p>	<p>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.</p>	No amendment considered necessary
	<p>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.</p>	<p>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.</p>	No amendment considered necessary
Good design should be in a spatial context, as well in the individual building itself.	<p>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.</p>	<p>Public space and buildings setbacks are addressed in the document's design principles.</p>	No amendment considered necessary
	<p>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.</p>	<p>Well-designed podiums with active frontages can enliven street 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.</p>	No amendment considered necessary

		ii)) Harrow has had its surfeit of tall buildings, and there should be a moratorium 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
		Podiums and Tall buildings . 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
		Podiums and Tall buildings . 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
		Lifetime Homes 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
7	Resident 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 sl hope in future the aims within the document are applied and developers are held 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

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 when St John's church stood alone in all its beauty.		
			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 roads with gardens but flank the roads.		
			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 has 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
9	Resident 9		We are dismayed by the growing number of high rise buildings in Harrow and the resultant densification of the population.	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 provide 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 environment 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 material.	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.	No amendment considered necessary
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					

12	HTA (Behalf of Tide Construction)	Harrow & Wealdstone Opportunity Area	<p>In line with London Plan Policy D9, LBH should identify locations where 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 ensure that the full context of the Opportunity Area is clearly defined, confirming that the SPD will not form a material consideration for development proposals coming forward within the area. The SPD should be clear from the outset that the methodology identified within should not be applied against sites within the Opportunity Area.</p>	<p>The London Borough of Harrow has committed to the review of its Local Plan, which will, as required by Policy D9 of the London Plan (2021), set out locations and heights within a relevant local plan policy. The SPD is not able to direct growth to certain areas, such as the Opportunity Area. However, it recognises that this is an area of change and does not form part of the geographical scope of the SPD.</p>	<p>No amendment considered necessary</p>
			<p>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.</p>	<p>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.</p>	<p>No amendment considered necessary</p>
			<p>It is our understanding that informal GLA feedback on the title of the SPD has seen the words 'Building Height' added to avoid confusion with the SPD and Policy D9 (Tall Buildings) of the London Plan. In addition, we 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 consideration for development proposals in certain parts of the borough. 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 framework for London and the opportunity it provides to help ensure the borough continues to meet its increasing housing targets.</p>	<p>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 analysis relating 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).</p>	<p>No amendment considered necessary</p>
		Harrow Town Centre	<p>The draft SPD defines Harrow's existing building heights and outlines that 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 height is Harrow Town Centre, defined as four storeys. The methodology in the draft SPD for determining a contextually tall building is equal to or greater than twice that of the prevailing height of an area. It is considered the use of crude prevailing height figures for a Town Centre location should be reviewed and amended. The Town Centre building heights are generally more varied, with established buildings up to 20 storeys and a more nuanced approach should be adopted to establishing surrounding character of a particular development site.</p>	<p>The draft SPD sets out general heights of buildings across the entire borough, which is a table taken from the Harrow Characterisation & Tall Building Study (2021). The table is intended to provide a snapshot of the entire borough, rather than a granular assessment of each of the neighbourhoods / areas of Harrow. The SPD makes it clear that the table is an overview and could not be relied upon on its own to determine context as part of a planning application. The 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.</p>	<p>No amendment considered necessary</p>
			<p>Developments for tall buildings within the Town Centre play an important role in positive place making and progressive growth, ensuring that high-density development comes forward in highly sustainable locations, contributing to the creation of successful streets and public realm enhancements. In addition, it should be noted within the SPD that tall 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.</p>	<p>Agree. However, the SPD is clear that developments within the Opportunity Area are not subject to the SPD, rather relying on policies within the wider development plan. It is noted that tall buildings that meet the Policy D9 London Plan (2021) definition will need to follow the detailed design requirements set out in that policy. Town Centres outside of the Opportunity Area will be subject to the SPD, and any developments subject to good design principles, as set out in the SPD.</p>	<p>No amendment considered necessary</p>

			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 those in the surrounding area.	The SPD provides a design guide for new development, noting that site optimisation is an important design principle. However, this does not mean site maximisation, and whilst height can be appropriate, 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 buildings across London. The policy encourages boroughs to define what is a "tall building" for specific locations; however, in doing so, it needs to 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 storey.	The Council agrees that London Plan Policy D9 is the starting point for tall buildings, and that any local definition should not be less than this definition. The SPD does not provide a definition or locations for tall buildings, which will be the role of a new policy through the local 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 Buildings. The policy test requires defined tall buildings to take into account the visual, functional, environmental and cumulative impact of the development as set out in the criteria for London Plan Policy D9 and this should be applied in emerging local policy and guidance for the borough.	Incremental densification is still able to occur within the suburban context of Harrow. However, the SPD is seeking to ensure that any development in suburban Harrow respects the strong character that exists. There is more scope for higher developments within the Opportunity Area (where this SPD is not a material consideration), 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 that optimises the capacity of each site, in line with national and regional policy objectives. It is critical that the SPD doesn't impose unnecessary limitations on site delivery, ensuring efficient use of available land within the borough in line with the NPPF and London Plan.	The SPD seeks to support good growth as sought through the London Plan (2021). The SPD is positively prepared to allow development, provided that it would be consistent with the suburban character 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 Behalf of Tesco Stores Limited)		Our client welcomes the inclusion of this explicit exemption for sites falling within the Harrow & Wealdstone Opportunity Area.	Noted	None
			Page 14 of the draft SPD contains a plan illustrating the prevailing height for each neighborhoods within the Borough, which includes the Harrow and Wealdstone Opportunity Area, but does not delineate it in any way. We request that this plan is updated to inset and grey out the Opportunity Area, as well as including a direct reference to paragraph 1.3.12 so that the plan cannot be misinterpreted as applying to the Opportunity Area or restricting the height of development within this area in any way.	The noted plan (and also table page 15) are extracts from the Harrow Characterisation & Tall Building Study (2021), which form part of the evidence base for the SPD and also the Local Plan review. The plan shows the general heights of development across the entire borough, of which the opportunity area is part of. However, the SPD makes it clear that development within the opportunity area is not subject to consideration against the SPD, rather development in this area would rely solely 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

	<p>The “prevailing height” (P in the document) for each area in the borough has been assessed in 2023 and is shown in the table on page 13 of the draft document (Note - it would be helpful if this table could be given a title and paragraph heading). This value of P should be should not increase with time – i.e. the P value for each area of the borough is maintained at the base line 2023 value in the table and the addition of any building with a greater number of storeys than the P value for that area (whether via planning permission or under GDPR) must not be allowed to increase the P value for that area to avoid height creep over time changing the character of an area.</p>	<p>it is considered that setting a height baseline at a particular point in time to cap the height of any future development would 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.</p>	<p>No amendment considered necessary</p>
Contextually Tall definition	<p>Strongly Disagree. As illustrated by the schematic drawings in paragraph 2.4.3 of the draft document, a “contextually tall” building of a height 2xP (twice the prevailing height of the existing buildings in an area) would have a significant detrimental impact on the street scene and potentially the amenity of residents in a suburban area. It would be too dominant and change the character of an area. However even a building less than 2xP high, for example the part six storey “Trinity Court” development in Pinner Town Centre (P=4 area) which is clearly visible from the Pinner High Street Conservation Area and from Pinner Memorial Park, can, and does, have a severe detrimental effect of the character of the area. Any new building proposed to be taller than the existing prevailing height (P) of the buildings in that area should be regarded as “contextually tall” and be subject to the greater planning scrutiny, design guidance and other requirements in the draft SPD document.</p>	<p>One building within a set context doesn't set the context for that area. Trinity court would be subject to the SPD - more than 6 storeys would be subject to the London Plan (2021) Policy D9 - also, the SPD makes it clear that buildings that are less than the contextually high formula can still be found to be unacceptable. A building that would not constitute a contextually high building does not mean that a scheme has a presumption in favour</p>	<p>No amendment considered necessary</p>
Four worked context examples	<p>Agree that these are examples of the types of sites in a suburban setting.</p>	<p>Noted</p>	<p>No amendment considered necessary</p>
	<p>Are these “worked examples” meant to relate and be read with the next chapter: 3. Design Objectives and Principles? The worked examples diagrams give examples of the various types of area and context for a site, but there is no indication on whether a “contextually tall” building would be considered suitable for the site in each case.</p>	<p>The worked examples provide a visual aid for applicants on how to consider the context in which a scheme may come forward within. These worked examples assist in determining the context of an area, and what may be an appropriate height for the area. any scheme that would come forward that is contextually tall in this context, will then need to apply the design guidance in Chapter 3.</p>	<p>No amendment considered necessary</p>
	<p>Re “Suburban Residential Context” and “Suburban Mixed Character” areas: Any site adjacent to a residential garden rear amenity space should not be considered suitable to accommodate a “contextually tall” building adjacent to that boundary. Any site where a “contextually tall” building could give rise to actual or perceived overlooking of the private rear amenity space or into a residential property should not be considered suitable to accommodate a “contextually tall” building.</p>	<p>Relationship with the edge of sites is an important consideration and the guidance in the SPD sets out how this needs to be addressed. Notwithstanding the height of a proposal being acceptable in terms of the context of the area, any scheme must also consider all other guidance within the SPD and also the wider development plan.</p>	<p>No amendment considered necessary</p>
Traffic Light System	<p>Disagree. The “traffic light” flow chart diagram works as a method of defining which applications should be called as “tall” or “contextually tall” and therefore required to be subject to additional planning considerations and restrictions. However, we consider, as stated above, that the “contextually tall” classification should apply to all applications for building with a proposed height greater than the existing prevailing height (i.e. >P). (Note: The “traffic lights” name for this flow chart is confusing and unnecessary - why not describe this diagram simply as a “flow chart” to avoid any confusion?)</p>	<p>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 contextual consideration, as this is set already in floors and height as defined in the London Plan (2021).</p>	<p>The traffic light diagram (Section 1.4, page 11) has been removed, and a revised flow chart included as figure 2L (page 24).</p>

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

			<p>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.</p>	<p>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 storeys 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.</p>	No amendment considered necessary
15	Conscious Living		<p>Considered reasonable to have buildings of 3 to 4 stories, but should maintain a sense of neighbourliness</p>	<p>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.</p>	No amendment considered necessary
			<p>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.</p>	<p>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.</p>	No amendment considered necessary
16	Transport Trading Limited Properties Limited (TTLP)	Role of SPDs	<p>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.</p>	<p>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.</p>	No amendment considered necessary
		Definition of Tall Building	<p>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.</p>	<p>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.</p>	No amendment considered necessary
		Locations of Tall Buildings	<p>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).</p>	<p>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.</p>	No amendment considered necessary

	<p>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 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</p>	<p>The Council do not consider the SPD to be inflexible. The Harrow 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 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.</p>	<p>No amendment considered necessary</p>
<p>Defining Context - Prevailing Height</p>	<p>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 Stanmore 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.</p>	<p>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 the borough. It then goes on to 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.</p>	<p>No amendment considered necessary</p>
<p>Benefits of Tall Buildings</p>	<p>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.</p>	<p>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 design guidance set out within that policy</p>	<p>No amendment considered necessary</p>

		Positive Design Guidance	We consider that a guidance document such as this would benefit from providing some positive guidance on how high quality architectural design of tall buildings can positively respect, or even better improve, the character of Metroland.	The SPD notes that contextually tall and tall buildings can have positive impacts. However, this SPD seeks to ensure that the suburban character of Harrow is protected, which as demonstrated 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.	No amendment considered necessary
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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 LPA agree that clarity around the Policy D9 of the London Plan (2021) tall building definition should be provided within the SPD	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
		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 analysis relating 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.

<p>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:</p>	<p>Agree. See Below</p>	<p>See Below</p>
<p>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 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.</p>	<p>Agree. Consistency with the wider development plan will ensure a more accurate and robust document, so messaging in terms of parking should be amended.</p>	<p>Para 3.7.20: Car free development is encouraged in well-connected locations. In all cases London Plan (2021) parking standards will apply including requirements for disabled persons' parking, electric vehicle charging spaces and cycle parking.</p>
<p>We welcome confirmation in 3.7.21 that dedicated servicing should be provided off the highway where possible. We also welcome confirmation 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 undercroft or basement may present a hostile environment.</p>		<p>Para 3.7.22: Where a basement, undercroft parking or service yard are proposed, these shall not prejudice pedestrian safety or personal security. Controlled access to these elements of a development should be provided to prevent unauthorised access and antisocial behaviour, particular during night-time hours.</p>
<p>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.</p>	<p>Agree: Text can reference the London guidance.</p>	<p>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. For more guidance please refer to London Cycling Design Standards (Chapter 8) or any superseding guidance; https://content.tfl.gov.uk/lcdd-chapter8-cycleparking.pdf</p>
<p>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.</p>	<p>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.</p>	<p>No amendment considered necessary</p>

		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
			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
4	Environment Agency	SEA	Agree with SEA Harrow Council Screening Opinion	Noted.	No amendment considered necessary
		Biodiversity - Design Principle F6	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).	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)	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 overshadowing 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 Biodiversity Net Gain. Matters in relation to water are picked up in the wider development plan, and where applicable 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/GreenInfrastructure/Home.aspx	
		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	Agree with SEA Harrow Council Screening Opinion	Noted	
		General Comment	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. 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 when assessing context	<p>While heritage is considered within the SPD, we are 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.</p> <p>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.</p> <p>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.</p>	<p>Officers consider that the flow chart notes that 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.</p>	Amend flowchart and contextual considerations text (Reformat)
Defining contextually tall	<p>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.</p>	<p>The term contextually tall seeks to deal with new development within suburban Harrow that is equal to or twice the height of the prevailing context. It is not intended to form a new definition of what is a tall building within Harrow, as the SPD is unable to introduce new policy. Policy D9 (Tall buildings) of the London plan (2021) sets a definition of what is a tall building, and the SPD acknowledges that. Furthermore, the local plan review will seek to implement a tall building policy for Harrow that will be consistent with the requirements set out in Policy D9.</p>	
	<p>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.</p>	<p>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.</p>	Figure 2B has now been amended to ensure that it reads as 'equal to or greater than'
Overview of design guidance	<p>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.</p>	<p>Officers agree that the inclusion of a diagram setting out the structure would be helpful for the usability of the SPD.</p>	Figure 1A has been included on Page 6 to provide a clear layout and structure of the SPD.
	<p>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.</p>	<p>The Guidance set out under Design Principle B2 (Development responds sensitively to protected 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 consider these, and the SPD does not intend to replicate this.</p>	No amendment considered necessary
Beauty	<p>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.</p>	<p>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.</p>	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?	Officers agree that setting out spatially where the scope of the SPD applies would be helpful for users of the SPD. The harrow & Wealdstone Opportunity Area has been included.	The map on Page 14 as referred to has been amended to show the Harrow & Wealdstone Opportunity Area (Figure 2A). Inclusion of Figure 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.
Suggested changes			
(Page 6) Status	The Council intends to further implement <u>integrate</u> this guidance into a future Local Plan, giving it even greater weight as part of the borough's development plan.	Officers agree that the amendment better reflects the future intent of the guidance.	Para 1.2.1: 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.
(Page 9) Heading	Harrow Local <u>Development</u> Plan	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.	Officers agree that the updated 2022 version should be referred to.	Para 1.3.20: 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.
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 to demonstrate where the SPD is applicable and where it is not.

Page 28	Proposed height must respond contextually sensitively 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 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.	Heritage assets are covered in the guidance, which this would fall within. In any case, the risk of this occurring given the location of the assets would be minimal.	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 includes a significant number of is a unique repository of significant period buildings and commanding views to St Mary's Harrow on the Hill form a vital part of the borough's overall character.	Officers agree that the suggested text provides better 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 Areas SPDs and Management Appraisals, Management Plans and Design Guides. 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 Areas SPDs and Management Appraisals, Management Plans and Design Guides. This includes Designated and non-designated heritage assets need to be considered, including:
	<ul style="list-style-type: none"> • Conservation Areas • Local Areas of Special Character • Nationally Listed Buildings • Locally Listed Buildings • Scheduled Ancient Monuments • Historic Parks and Gardens (<u>Registered Parks and Gardens and locally listed parks</u>) 		<ul style="list-style-type: none"> • Scheduled Monuments • Historic Parks and Gardens (Registered Parks and Gardens and locally listed parks)
	3.4.4 When tall and contextually tall buildings are located in close proximity to heritage assets and/or may impact on their significance and appreciation , 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)	It is vital that new development can enhance existing heritage assets. New housing at Bentley Priory sensitively responds to <u>addresses</u> 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 registered listed 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	As the Council may know, Historic England has published guidance on the public realm, which is available for download here: https://historicengland.org.uk/images-books/publications/streets-for-all/	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	We suggest adding a cross-reference to protected views 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

Question	Theme	Summary of Comments	Councils Response	Amended Text
Question 1: The design guidance is separated into three areas to help set out an approach to successful development. Do you have any comments about this approach?				
	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
		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 through 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.	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.	Precedent examples have been revised throughout the document.
		Quality of living in areas very close to busy roads needs to be rigorously applied	Agreed.	No amendment considered necessary
		I do not agree with your definition of high quality design. The examples you give are mostly unattractive eyesores.	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 on best practice.	No amendment considered necessary
		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.	Design quality is a subjective matter. However, the precedents and guidance has been based on best practice. The precedents attempt to demonstrate successful elements specific to a particular design principle, they are not necessarily sought to be replicated as this may not be appropriate in parts of Harrow.	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 necessary
		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	A four storey building may not be appropriate within a context that has a strong two storey character. The SPD does not provide a presumption in favour of such developments. However, a four storey development in a mixed character area and / or town centre locations may be appropriate from a height perspective. Further guidance within the SPD should be applied to ensure a high quality development.	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
		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

		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
		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 gym ..." 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 roof 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	The SPD appears to skimp over the requirements for parking, the statistics for the U.K say that households have around 1.6 cars, there is no rule on provision 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 way to resolve this. You may remember the early planning for Crossrail in 1991 a branch to Harrow was considered.	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

		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 Worples 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
		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: Do you have any further comments 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 fallen 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.	No amendment considered necessary
	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 suburban Harrow. The SPD does not provide a presumption in favour of against a contextually tall building, rather to make sure its height is appropriate and that it achieves a high quality of design to the matter set out in the guidance.	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

		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 & 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 out as part of the Local Plan review.	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	National legislation requires that planning permissions are determined in accordance with the development, which includes the Harrow Local Plan and the London Plan (2021). However, planning permissions taken against the development plan must also undertake public consultation where views of the public are considered as part of the decision taking process. Consultation responses are a material planning consideration.	No amendment considered necessary
	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
		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 relevant policies within the development plan.	No amendment considered necessary
		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 evenly spread out across the borough. Tesco Towers will be largely unaffordable for local people and will abut an area that it is wholly unsuitable for.	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 against development within the opportunity area.	No amendment considered necessary

		<p>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 'village 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.</p> <p>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?</p> <p>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 than others' approach</p>	<p>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.</p>	No amendment considered necessary
	Historic Delivery	<p>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.</p>	<p>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 protected views up to St Mary's Church on Harrow on the Hill.</p>	No amendment considered necessary
		<p>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.</p>	<p>The SPD is not proposed to cover the Harrow & Wealdstone Opportunity Area, and would only be able to be applied to future developments.</p>	No amendment considered necessary
		<p>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.</p>	<p>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.</p>	No amendment considered necessary
		<p>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!!</p>	<p>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).</p>	No amendment considered necessary
		<p>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!</p>	<p>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.</p>	No amendment considered necessary
	Infrastructure	<p>Harrow Council should also consider all other factors beyond character, such as impact to traffic, parking, noise etc.</p>	<p>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.</p>	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 & 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.	The development noted is not a Council owned scheme, and the Harrow Planning Committee resolved to refuse this scheme. The scheme was called in by the Mayor of London (as is his remit) and planning permission granted. The site is located within the Harrow & Wealdstone Opportunity Area and therefore the SPD would not be applied to such schemes.	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 & 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
		HGH agree that sensitive densification is a good approach, but it must be designed.	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)	No amendment considered necessary
		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 & 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

		<p>Tall buildings affect a wide area by their very height, not just the adjacent area's.</p> <p>- 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.</p> <p>- The wording of this question is so general it would allow tall buildings in any part of the borough.</p>	<p>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.</p>	<p>No amendment considered necessary</p>
	Housing / Affordable Housing	<p>Harrow has enough housing and more is not needed to be delivered.</p>	<p>Harrow is required to deliver homes by the London Plan (2021). Specifically, the London Plan requires Harrow to deliver 802 homes per year.</p>	<p>No amendment considered necessary</p>
		<p>Much of the housing is not affordable to Harrow residents.</p>	<p>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.</p>	<p>No amendment considered necessary</p>
	Other	<p>The question is about how the council is approaching to address the tall buildings in the borough.</p> <p>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.</p> <p>"1930s leafy areas" characteristics of Harrow, described by the planning portfolio-holder, have changed over the time, and the planning policies should reflect this.</p> <p>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.</p> <p>In 2021, Harrow was home to around 37.0 people per football pitch-sized piece of land, compared with 33.8 in 2011.</p> <p>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).</p> <p>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).</p>	<p>The SPD provides a design guide for new development. The Local Plan Review will address the borough profile and spatial strategy.</p>	<p>No amendment considered necessary</p>
		<p>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.</p>	<p>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.</p>	<p>No amendment considered necessary</p>
		<p>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 stock available for young families and first time buyers, it would reduce 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.</p>	<p>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.</p>	<p>No amendment considered necessary</p>
		<p>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. 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.</p>	<p>Agreed. Any change in site level is a material on-site consideration, and will form part of the context of the area.</p>	<p>Insert at Para 2.2.6; 'Site Levels of site / neighbouring sites'</p>

		<p>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 needs or rights of disabled residents or users of Harrow.</p> <p>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. Disabled people commonly die in fires (including Grenfell) because building operators often implement extremely dangerous evacuation procedures such as telling disabled people to 'stay put' in the burning building.</p> <p>We want to see each part of the building being equipped with two fire stairways, and for the lifts to be fully fire resistant. All components of course should meet the very highest safety standards possible.</p> <p>If the building cannot be made safe and accessible, agreement should not be given to proceed.</p>	<p>Developments that propose new housing are required under the wider development plan to ensure accessible homes are provided (10%). This is secured by way of policy, and also sets out what level of access is required to be provided under the Building Control Act. In terms of fire safety, this is also secured under the wider development plan and will vary in terms of the height of a development. Where buildings exceed the tall building definition as set out in Policy D9 (Tall buildings) of the London Plan (2021), a greater level of scrutiny and mitigation is required. Officers consider that the London Plan (2021) sets out the policy requirements for such matters and is the correct forum for these to be located in.</p>	<p>No amendment considered necessary</p>
		<p>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 because of living in high rise accommodation.</p>	<p>The guidance set out in the SPD is based on best practice, which seeks to ensure that new development creates high quality places for people to live and visit. Some of the precedents used show poor practice, and should not be replicated.</p>	<p>No amendment considered necessary</p>
		<p>There should be no tall residential buildings or offices. These should only be reserved for public services e.g. where existing hospitals are being upgraded or replaced.</p>	<p>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.</p>	<p>No amendment considered necessary</p>
		<p>should be never allow and put in convents that now and in future whoever is in power cannot be allowed to build anywhere in the borough</p>	<p>Land covenants are outside of planning legislation.</p>	<p>No amendment considered necessary</p>

Question 3	Theme	Summary of Comments	Councils Response	Amended Text
Question: Please provide any further comments on the Council's approach to defining a contextually tall building.				
		A range of alternative contextually tall definitions have been proposed, ranging from remaining at the same height as existing buildings, to no higher than the tallest 'older' building, ranges from 3/4, 1.3 and 1.5 times the prevailing height, to anything more than 4 storeys should be defined as a tall building.	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 greater level of scrutiny, which is provided by the guidance as set out in the SPD. Developments that are below what would be considered contextually tall are not presumed to be automatically acceptable, and will still be considered against relevant policies within the wider development plan.	No amendment considered necessary
		Should building heights for tall buildings should be set out in both number of storeys or meters?	Agree. A tall building is defined as both number of storeys and metres. The London Plan (2021) this is not 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, the height in floors or meters will differ depending on the context, as such officers consider remaining at equal to or twice the height is more appropriate for building less than the London Plan definition.	Reference to London Plan Tall Building should state not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. No amendment necessary to contextually high definition.
		The original height of the local buildings should be the defining factor, not later additions such as loft conversions.	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 upwards extensions). The intent of the SPD is to assist in 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 amendment considered necessary

		This should apply to central Harrow's residential areas too.	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
		The definition is too weak. The presumption should be against building above the prevailing height. The guidelines should then give examples of the limited circumstances in which special permission should be given to go higher - e.g. for hospitals where available land would not otherwise permit sufficient capacity for Harrow.	The SPD does not provide a presumption against developments that would be considered contextually tall, provided that they are appropriate for the context 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
		Please also take into account the Light blockage impact on nearby residential blocks of flats and impact of additional residents population on local area congestion.	Design Principle D4 (Orientation and neighbouring sites), Design Principle D4 (Residential Amenity), and Design Principle D8 (Daylight and overshadowing) all seek to ensure that new developments do not unacceptably harm light levels to adjoining properties. Community Infrastructure Levy is secured from new developments to assist with essential infrastructure that will assist in addressing congestion.	No amendment considered necessary
		I think other priorities are more important - in the current cost of living crisis, allowing for high quality, affordable housing for Harrow residents in tall building next to train stations is much more urgent than defining "contextually tall" building norms.	The progression of this guidance is a priority of the administration. The SPD seeks to ensure the right type of development in the right locations, which will assist in delivering the high quality, affordable housing for residents.	No amendment considered necessary

Question 4	Theme	Summary of Comments	Councils Response	Amended Text
Question: Please provide any further comments on the Worked Examples.				
Worked Examples		<p>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</p> <p>The examples you provide are completely out of character with neighbouring dwellings.</p>	<p>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.</p>	No amendment considered necessary
		<p>The worked examples do not seem to indicate what would be permitted on the areas to be developed so how can we comment?</p>	<p>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.</p>	No amendment considered necessary
		<p>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</p>	<p>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.</p>	No amendment considered necessary
		<p>Agree as long as it applies to all of Harrow.</p>	<p>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.</p>	No amendment considered necessary
		<p>We need real examples</p>	<p>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.</p>	No amendment considered necessary

		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
		The seem well chosen	No further comment	No amendment considered necessary
		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 the SPD.	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
		1. First example invades into privacy of all residents from their backyard. Sunlight issues as well. 2. It is okay 3. Ok. Noise pollution for the new resident is an issue, but there for all residents of that location anyhow. 4. 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.	The working examples seek to provide examples of local Harrow environments, and do not show new developments within them. The working examples are present to demonstrate how context needs to be considered. Any new development will need to be considered against the design objectives and principles.	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
		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.	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. However, the SPD is not introducing a new policy (unable to legally do so) but will assist for taller developments in suburban areas where appropriate.	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 designs where appropriate.	No amendment considered necessary

		<p>The Marlborough ward may be in central Harrow but it is distinctly suburban and many roads have a village feel. It is therefore wrong for it to be surrounded by overbearing tall buildings that are completely out of character with the ward. Please stop the proposals for Tesco Towers and other tall buildings in this area.</p>	<p>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.</p>	<p>No amendment considered necessary</p>
		<p>The town planning should help to achieve socio-cultural and class 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!</p>	<p>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.</p>	<p>No amendment considered necessary</p>
		<p>Important to consult local residence those in the same street and those impacted</p>	<p>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.</p>	<p>No amendment considered necessary</p>
		<p>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.</p>		<p>No amendment considered necessary</p>
		<p>Matters if homes in mixed areas are going to be the poor relation to leafy areas. No to Tesco Towers</p>	<p>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.</p>	<p>No amendment considered necessary</p>
		<p>I am pleased some effort is being made to retain the character of Metroland Harrow, but the problem of overly tall buildings remains, and it is not appropriate to the original character of the town to 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.</p>	<p>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.</p>	<p>No amendment considered necessary</p>
		<p>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.</p>	<p>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 within that context.</p>	<p>No amendment considered necessary</p>

		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

Question 5	Theme	Summary of Comments	Councils Response	Amended Text
Question: Do you have any further comments on the traffic light system?				
		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
		If there would more micro-areas pre-designated for tall buildings I would support.	Areas for tall buildings will be designated through the new local plan, which is the correct forum to do so and as directed by Policy D9 (Tall buildings) of the London Plan (2021)	No amendments considered necessary
		adds barriers to building affordable homes and creating appropriate density for the borough	The SPD is not seeking to create a barrier to development or affordable homes, rather ensuring that development that is coming forward is appropriate for its context and also of a high quality design.	No amendments considered necessary
		It is so vague as to be unusable	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 accord with policies within the wider development plan.	No amendments considered necessary
		This system may be open to wide interpretation leading to abuse. I notice that community & environmental impacts of such structures do not figure in the flowchart.	The flow diagram is considered to be clear to follow in relation to when a new development would be a tall building, contextually tall building or neither, and then what guidance needs to be followed. Matters in relation to those listed are contained within the design principles within the SPD.	No amendments considered necessary
		It's easy enough to understand but I do not agree with the restrictions proposed for tall buildings	It is not clear as to what restrictions the comment does not agree 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 the SPD is not to restrict new development, rather to ensure that it is appropriate for its location and is of a high quality design.	No amendments considered necessary
		Needs more consultation	The consultation for the SPD has been undertaken in accordance with the Harrow Statement of Community Involvement and 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. For example, the first box says 'Define prevailing heights within context', but nowhere in the document is there a section specifying what an application must include in order to satisfy that box. Ditto the second box 'Define contextual conditions'.	The traffic light system has been replaced by a flow diagram which is considered to be more user friendly when developing design proposals for contextually high building. It is simplified by removing the Tall Buildings element for proposals that would be defined a tall building as per the London Plan (2021). Furthermore, each step 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.
		This is just a basic flow chart. The issue is with the decision points especially the definition of contextually tall. No buildings of 6 storeys are necessary in this suburban area and future ones should not be permitted.	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 imposed definition. The SPD notes that in most instances, a development that meets this definition is unlikely to be supported within a suburban context. This is included however as there may be 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 building that meets the London Plan (2021) definition may be appropriate.	The traffic light system diagram on page 14 has been replaced with the flow diagram (figure 2L) on page 24.

		<p>It is not a traffic light system - which is based on red, amber and green.</p> <p>- 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.</p>	<p>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 be considered in relation to a proposal.</p>	<p>The traffic light system diagram on page 14 has been replaced with the flow diagram (figure 2L) on page 24.</p>
		<p>This is open to interpretation. Who is defining contextual conditions?</p>	<p>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.</p>	<p>No amendments considered necessary</p>
		<p>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.</p>	<p>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.</p>	<p>The traffic light system diagram on page 14 has been replaced with the flow diagram (figure 2L) on page 24.</p>
		<p>There is an important sense error in the diagram. Tall I understand to be "6 or more storeys". The green box to which the "No" answer leads reads "The proposal is not more than six storeys tall ... ". A building of six storeys meets the criterion of being "not more than six storeys". The green box should I believe read "The proposal is less than six storeys ...". This would be consistent with The London Plan 2021 which at eg 3.9.3 requires a council to define a tall building but says this "should not be less than 6 storeys" - ie LBH can define a building of 6 storeys as tall. LBH should also incorporate the 18m definition of the London Plan (just in case).</p> <p>But I do strongly agree with the traffic light system, subject to the changes I have indicated above.</p>	<p>The Council agree that the wording requires clarification to 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 proposal would constitute a contextually high building. Such an exercise is not required for buildings that would meet the London Plan (2021) definition, as this is not subject to a contextual analysis.</p>	<p>The traffic light system diagram on page 14 has been replaced with the flow diagram (figure 2L) on page 24.</p>
		<p>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.</p>	<p>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 proposal would constitute a contextually high building. Such an exercise is not required for buildings that would meet the London Plan (2021) definition, as this is not subject to a contextual analysis. Proposals that do not meet the contextually high definition are not automatically considered acceptable.</p>	<p>No amendments considered necessary</p>
		<p>Many developers will find a loophole through this so you will need to consider some applications and keep the ability for special circumstances.</p>	<p>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.</p>	<p>No amendments considered necessary</p>
		<p>I don't fully understand this system. The overriding comment I need to make is STOP ALLOWING TALL BUILDINGS TO BE BUILT. ENOUGH FUTURE GHETTOS ARE ALREADY HERE!</p>	<p>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 identify appropriate heights and locations.</p>	<p>No amendments considered necessary</p>

		<p>There is a risk of overcomplicating planning applications. Most of the principles and objectives set out in the document are already established planning policy requirements or design principles, and so it is not entirely clear what this is achieving.</p> <p>All development proposals should be and will be reviewed on a site-by-site basis where height should be determined by its own local context.</p>	<p>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.</p>	No amendments considered necessary
		<p>The system is all right but I believe contextually tall is not the correct parameter. Each planning permission is unique.</p>	<p>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.</p>	No amendments considered necessary
		<p>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% minimum social housing.</p>	<p>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)</p>	No amendments considered necessary
		<p>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 opportunities and Core Strategy!</p>	<p>The SPD is a design based document which seeks to ensure that new development respects the character of any area of the borough within which is proposed to be located in. It is considered that the context based approach is appropriate to ensure that new development responds most accurately to its locality.</p>	No amendments considered necessary
		<p>It will work providing the architects take into account all other proposals. eg surrounding area..etc</p>	<p>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.</p>	No amendments considered necessary
		<p>It is predicated on the idea that a proposed development can go 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 design.</p>	<p>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.</p>	No amendments considered necessary
		<p>Existing traffic and facilities should be considered prior to building approval</p>	<p>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.</p>	No amendments considered necessary
		<p>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.</p>	<p>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))</p>	No amendments considered necessary

	Other	<p>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 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.</p>	<p>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.</p>	<p>No amendments considered necessary</p>
		<p>If Yes, rework and repeat until No.</p>	<p>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.</p>	<p>No amendments considered necessary</p>
		<p>The system doesn't take in to account, on the light and environment in the area.</p>	<p>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.</p>	<p>no amendments considered necessary</p>
		<p>It is not clear how this system could provide further guidance to prevent contextually tall buildings from being built in suburban residential contexts</p>	<p>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.</p>	<p>No amendments considered necessary</p>
		<p>The most relevant issues are safety and equality of access</p>	<p>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.</p>	<p>No amendments considered necessary</p>
		<p>You cannot design away the height of a building. It is the height which changes the character of the area.</p>	<p>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.</p>	<p>No amendments considered necessary</p>

Question 6	Theme	Summary of Comments	Councils Response	Amended Text
Question: Do you have any further comments 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
		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

		<p>1. Section C2 on page 34 needs to be expanded to clarify what 'overly prominent' means. This is core.</p> <p>2. 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.</p> <p>3. 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.</p> <p>4. '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.</p>	<p>1. 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.</p> <p>2. 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.</p> <p>3. 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.</p> <p>4. 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.</p>	No amendment considered necessary
		If optimising land use means building tall buildings at/near Tesco then I very strongly disagree. You are destroying our neighbourhood	<p>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.</p>	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.	<p>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.</p>	No amendment considered necessary
		<p>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.</p> <p>The infrastructure in Harrow is already struggling to support the existing population density e.g. roads, public transport, NHS, education etc. Why is it assumed that we need to have taller buildings which will just exacerbate the problem? There is already over development of existing properties when such large increases to floor area are allowed.</p>	<p>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.</p>	No amendment considered necessary

		<p>I agree with most of the above.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>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 an SPD is able to.</p>	<p>No amendment considered necessary</p>
		<p>"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.</p> <p>In 2021, Harrow was home to around 37.0 people per football pitch-sized piece of land, compared with 33.8 in 2011.</p> <p>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).</p> <p>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)]</p>	<p>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 accordingly.</p>	<p>No amendment considered necessary</p>
		<p>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.</p>	<p>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.</p>	<p>No amendment considered necessary</p>
		<p>Objectives D-1 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.</p>	<p>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.</p>	<p>No amendment considered necessary</p>
		<p>Objective H may clash with the rest. See my comments on the previous page re the difference between high-quality design and construction.</p>	<p>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 regional 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.</p>	<p>No amendment considered necessary</p>
		<p>overdevelopment is a no . Maintaining front gardens and back gardens and all types of greenery should be first priority; planning should be restricted</p>	<p>The SPD seeks to ensure that overdevelopment does not occur through the guidance contained within it. Guidance on greenspace and playspace is set out within the SPD (Design Principles D4 & D11)</p>	<p>No amendment considered necessary</p>

		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
		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. 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 heights cannot be progressed is highly inappropriate. Planning policy requires sites	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 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
		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

		<p>It is vital to protect the current suburban nature of the area. No more buildings higher than the prevailing height please .</p> <p>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 prices ..which 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 ..</p> <p>The character of Harrow has so deteriorated a huge amount in the 40,+ years I have lived here.</p> <p>There has been no thought or consideration to the overall design of the town ..It now consists of random , higgledy -piggledy , uncoordinated developments with poorly built, over tall buildings.</p> <p>Probably not possible to put this right now .but please no more of this poorly coordinated building .</p> <p>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..</p>	<p>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.</p> <p>With regard to consultation, this follows agreed standards agreed by Harrow Cabinet within the Statement of Community Involvement. Consultation is also reviewed by the Harrow Communications Department. The point is noted however.</p>	No amendment considered necessary
		<p>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.</p> <p>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 Metroland has been all my life.</p>	<p>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.</p> <p>The design guidance seeks to ensure high quality design, which can allow for modern / contemporary buildings. New developments do not need to replicate / mimic the existing designs.</p>	No amendment considered necessary
		<p>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.</p>	<p>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.</p>	No amendment considered necessary
		<p>Don't allow Pinner Road development to go ahead. We need to protect green spaces, and badgers!</p>	<p>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.</p>	No amendment considered necessary
		<p>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.</p> <p>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.</p> <p>Deliver economic growth - too complex to get into this one in this context.</p>	<p>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.</p> <p>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.</p>	No amendment considered necessary
		<p>Objectives C, G, H & 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.</p>	<p>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.</p>	No amendment considered necessary
		<p>Provide proper parking facilities. This is not provided for anywhere creating worse situation for homeowners in near distance to new developments.</p>	<p>The SPD provides guidance on Transport & Parking (Design Principle D5), however parking requirements are set by the London Plan (2021).</p>	No amendment considered necessary

		<p>Make good all the poorly maintained older existing homes. Renovate old derelict buildings. Convert old existing tall buildings as livable dwellings. Improve infrastructure, roads etc make parking easier for shoppers. All these changes will raise local economy and provide new homes whilst making the residential and commercial areas look better bringing in further private money.</p>	<p>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.</p>	<p>No amendment considered necessary</p>
		<p>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 match and upgraded or new to cater for the new people</p>	<p>The SPD seeks to ensure that new development is contextually appropriate, and where extra height would be appropriate, it would be of a high quality design. The SPD is not a document that seeks to increase the population of Harrow. New development will in most circumstances (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.</p>	<p>No amendment considered necessary</p>

Question 7	Theme	Summary of Comments	Councils Response	Amended Text
Question: Do you have any other comments about the Draft Tall Buildings ('Building Heights') Supplementary Planning Document (SPD) including any changes considered necessary to improve the document?				
Comments included under this section are only addressed where not addressed previously.				
		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.	No amendment considered necessary
		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
		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 acknowledge that the link within EngagementHQ consultation platform did not link to the working drawings. However, the matter was rectified as soon as practically possible, leaving sufficient time to review. Furthermore, 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

		<p>It will only work if you follow your own policies. Policies in the Harrow and Wealdstone Area Action Plan are not being followed.</p> <p>The Safari Cinema flats are 11 storeys in an area slated for maximum 6 storeys.</p>	<p>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.</p>	<p>No amendment considered necessary</p>
		<p>1. 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.</p> <p>2. 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.</p> <p>3. 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.</p>	<p>1. 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.</p> <p>2. The SPD is unable to require ancillary floorspace for flatted developments. Housing must meet the Nationally Prescribed Internal Space Standards.</p> <p>3. 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.</p>	<p>No amendment considered necessary</p>
		<p>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.</p> <p>HGH previously submitted representations to the consultation on the Harrow Characterisation and Tall Building Study, noting that:</p> <ul style="list-style-type: none"> - 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 	<p>1. 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. Officers have amended the text accordingly.</p> <p>2. The consultation undertaken is in relation to a SPD, and not the Harrow Characterisation and Tall Building Study (2021). 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 protects the suburban character of Harrow.</p>	<p>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 documents on a case-by-case basis.</p>
		<p>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.</p>	<p>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.</p>	<p>No amendment considered necessary</p>

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