

# **Cabinet**

## **Background Papers**

**Date:** **Thursday 15 February 2024**

**KEY 9. New Harrow Local Plan - approval to consult (Regulation 18 version)**  
(Pages 3 - 360)

Report of the Chief Planning Officer and Director of Regeneration and Sustainable Development

**KEY 13. Final Revenue Budget 2024/25 and Medium Term Financial Strategy to 2026/27** (Pages 361 - 504)

Report of the Interim Director of Finance and Assurance.

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**Report for: Planning Policy  
Advisory Panel**

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<b>Date of Meeting:</b>	22 January 2024
<b>Subject:</b>	New Harrow Local Plan – Draft Local Plan (Regulation 18 version) – recommendation to Cabinet for approval to consult
<b>Key Decision:</b>	No – Advisory Panel Yes – when considered by Cabinet
<b>Responsible Officer:</b>	Viv Evans, Chief Planning Officer  Emma Talbot, Director of Regeneration and Sustainable Development
<b>Portfolio Holder:</b>	Councillor Marilyn Ashton, Deputy Leader of the Council, Planning & Regeneration Portfolio Holder
<b>Exempt:</b>	No
<b>Decision subject to Call-in:</b>	No – advisory panel only
<b>Wards affected:</b>	All Wards
<b>Enclosures:</b>	Appendix 1 – Draft New Harrow Local Plan – Regulation 18 version Appendix 2 – Draft Interim Integrated Impact Assessment (IIA) advice note (published separately) Appendix 3 – Recent Government Policy Announcements and Implications for Draft Local Plan

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

This report presents the Draft Harrow Local Plan (Regulation 18 version) to the Panel for consideration, feedback and recommendation to Cabinet for approval to consult for eight weeks over February-April 2024. The report is accompanied by the draft Interim Integrated Impact Assessment (IIA) advice note (published separately). It also provides the Panel with an update on the Local Plan process since it last considered the matter in November 2023 and the next steps in the process [including outstanding background / process material to be added to the draft Local Plan (Regulation 18 version) prior to the document being consulted on]. The report also provides an outline of the proposed consultation arrangements.

### **Recommendations:**

The Panel is requested to:

- (A) note and comment on the report and Appendices.
- (B) recommend the draft new Harrow Local Plan (Regulation 18 version) to Cabinet.
- (C) note the intention to make minor amendments and insert outstanding background / process material to the draft new Local Plan prior to presentation to Cabinet and subsequently prior to commencement of consultation (under delegated authority) (paragraph 5.9 of the report).
- (D) note and comment on the proposed consultation arrangements (section 7 of the report).

### **Reason: (for recommendation)**

The Harrow Local Plan is one of the key documents in the Council's policy framework. Member input into the draft new Harrow Local Plan and the proposed consultation arrangements, through the Panel, is an essential part of the Local Plan process.

## **Section 2 – Report**

### **1.0 Introduction**

- 1.1 This report relates to the new Harrow Local Plan and:
- (a) presents the Draft new Harrow Local Plan – Regulation 18 version (and accompanying documents) to the Panel for consideration, feedback and commendation to Cabinet for approval to consult for eight weeks over February-April 2024;
  - (b) provides the Panel with an update on the Local Plan process since it last considered the matter in November 2023 and the next steps in the process [including outstanding background / process material to be added to the draft Local Plan (Regulation 18 version) prior to document being consulted on]; and
  - (c) provides an outline of the proposed consultation arrangements.

## **2.0 Options considered**

- 2.1 The option of not providing an update nor seeking feedback or comment was considered and dismissed as this would not give the Panel the opportunity to monitor and comment on something within their Terms of Reference. The Harrow Local Plan is one of the key documents in the Council's policy framework. Member input, through the Panel, is an essential part of the process.
- 2.2 In developing the draft Local Plan, various potential policy options were considered. These are documented in the draft Local Plan, with reasonable alternatives (options) included where appropriate. Where no alternatives are considered appropriate, the reasons for this have been identified (i.e. the need to be in general conformity with the London Plan).

## **3.0 Background**

- 3.1 The Council has committed to preparing a new Harrow Local Plan. This is in response to the time that has elapsed since the current Local Plan was adopted (2012 and 2013) and changes in national and regional planning policy since that time, as well as emerging issues and local priorities.
- 3.2 The Panel has formally considered the new Harrow Local Plan at five previous meetings:
  - (a) *9 January 2023*: the Panel considered a report in relation to the Council's Local Development Scheme (LDS). The LDS is a rolling three-year project plan setting out all the planning documents to be produced by the local authority and the timetable for their preparation. The draft LDS considered by the Panel committed the Council to prepare a new Local Plan, with adoption scheduled for December 2025. The LDS was subsequently agreed by Cabinet on 16 February 2023.
  - (b) *6 March 2023*: the Panel considered a report that introduced the Local Plan process in more detail and key issues that it will need to address. It sought comments and discussion from the Panel to assist in the scoping of the Local Plan, including its broad vision and objectives, to inform drafting of the new Local Plan.
  - (c) *13 July 2023*: the Panel considered the revised Statement of Community Involvement (SCI) which sets out how the Council will consult on planning matters, including the draft Local Plan. The revised SCI is anticipated to be adopted under delegated authority by the end of January 2024. The draft document was subject to a 21-day period of consultation in mid-2023.
  - (d) *18 September 2023*: the Panel considered the draft Infrastructure Delivery Plan (IDP) Context Report, which sets the context for the full IDP, which is expected to be completed in the middle of next year (in time for the second round of consultation

on the draft Harrow Local Plan). The full Infrastructure Delivery Plan is required as part of the Evidence Base for Local Plans

(e) *2 November 2023*: the Panel considered the draft Borough Profile, Spatial Vision and Strategy and Strategic Objectives for the new Local Plan. The Borough Profile sets the context for the plan. Within the plan, the Spatial Vision and Strategy, and Strategic Objectives provide the overarching narrative for the document from which detailed provisions / policies follow. Members asked some questions regarding the draft material, but no changes / alternatives were suggested and therefore the draft Local Plan (attached at Appendix 1) has been drafted on the basis of the material presented and agreed at the 2 November 2023 meeting.

- 3.3 Each report also provided an update on the Local Plan process, including evidence base development and Local Plan drafting, where relevant. The previous reports are included as background papers to this report.
- 3.4 The plan will cover the period from 2021-2041. Under government guidance, plans should be reviewed (and updated if necessary) every five years.

## **4.0 Local Plan Progress**

- 4.1 Since the Panel's November 2023 meeting, considerable work has been undertaken, culminating in the Draft Local Plan (Regulation 18 version) presented at Appendix 1. This work can be broadly broken down into evidence base development, stakeholder engagement and plan drafting. Additionally, a new National Planning Policy Framework was published on 19 December 2023 and the implications of this (and other Government announcements) on the new Local Plan is also documented below and in Appendix 3. The new NPPF is included as a background paper.

### *Evidence base development*

- 4.2 All draft Local Plans are examined by the Planning Inspectorate for 'soundness'; plans must be found sound before they can be adopted by the Council. One of the 'tests of soundness' under the National Planning Policy Framework (NPPF) is that a plan must be 'justified'. This means it must represent 'an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence' (NPPF, paragraph 35).
- 4.3 The report to the Panel in November 2023 provided details of the evidence base informing the new Local Plan and additional evidence base work commissioned. Below is an update on this:
- (a) *Update to the Economic Development Needs Assessment (EDNA) 2017* – the need to update this has become evident

from the Mayor of London's responses to recent local plan consultations in other boroughs, as well as significant changes in the economy since 2017 (i.e. increased levels of online shopping, increased rates of people working from home, impacts from Covid, and the impact of high inflation on personal budgets). This evidence base work will be finalised in January 2024, but the key findings are that only modest additional provision is required for town centre use floorspace (retail, food / beverage, leisure and entertainment) and that there is sufficient office floorspace and any release should be carefully monitored.

- (b) *Tall Buildings Study* – this is required to meet the requirements of London Plan Policy D9: Tall Buildings. Draft outcomes of this work have been incorporated into the draft Local Plan attached at Appendix 1 and the overall study will be finalised in January 2024.
- (c) *Integrated Impact Assessment (IIA)* – this is an assessment of the draft Plan having regard to sustainability ('sustainability appraisal'), equalities ('equalities impact assessment') and health impacts ('health impact assessment'). It runs parallel with the Local Plan process and helps test alternatives and refine policies throughout the Local Plan process. The interim findings are attached at Appendix 2. An accompanying Habitats Regulations Assessment (HRA) will be prepared and published alongside the revised draft Plan at the second round of consultation ('Regulation 19 consultation').

4.4 As an outcome of the development of the Tall Buildings Study (referred to above) and in discussions with the Greater London Authority (GLA), it is considered prudent to update the Views Assessment (prepared 2012) that informed the identification of protected views within the current Local Plan. This update will review existing protected views having regard to changes / developments since the original study was undertaken, as well as to reflect contemporary guidance for such assessments and the London Plan 2021.

4.5 A formal 'call for sites' process will be conducted in parallel with the proposed consultation on the Draft Local Plan (Regulation 18 version). This will invite landowners, developers and other stakeholders to put forward any large sites (over 0.25 ha) that could potentially be considered for allocation for development in the new Harrow Local Plan. Such allocations would be reflected in the next version ('Regulation 19' version) of the Local Plan. The process will be managed by specialist software (Urban Intelligence's 'Place Maker' software) which also allows the Council to proactively and efficiently identify potential development sites, having regard to existing land uses, ownership and planning / infrastructure constraints. The system also has a public facing element which enables developers / landowners / residents to identify sites potentially suitable for development.

- 4.6 As noted in the November 2023 Panel report, once the Local Plan has been drafted and refined (post first round of consultation), it will be subject to a Viability Assessment (to ensure the policies collectively don't make development unviable within the borough). Additionally, any site allocations (i.e. sites specifically identified in the draft Plan as being suitable for development) will be subject to a 'Level 2' Strategic Flood Risk Assessment (SFRA). Briefs for this work will be developed over January-February 2024. The Council's 'Authorities Monitoring Report' (AMR) that monitors the performance of the current Local Plan will be updated as it forms part of the evidence base that justifies policies in the draft plan.
- 4.7 As noted in the November 2023 report, the Council has appointed Kings Counsel (Saira Kabir Sheikh KC) to assist the Council during the Local Plan process. An initial conference focused on key parameters influencing the Local Plan process, such as the plan period (2021-2041), approach to setting housing targets (London Plan target versus need), and emerging issues from evidence base preparation and policy development. A second conference has subsequently been held that provided feedback on the emerging Local Plan policies. The version of the policies / Draft Local Plan attached at Appendix 1 has been updated to reflect feedback from Kings Counsel. Counsel will continue to be involved in reviewing the draft Local Plan / evidence base before key stages such as the revised version of the Local Plan (post first round of consultation), submission to Government and representing the Council at hearings as part of the independent examination of the draft Local Plan by the Planning Inspectorate.

#### *Stakeholder engagement*

- 4.8 The Local Plan is a key land use policy mechanism for most functions of the Council (i.e. housing, heritage, economic development, transport, education, social care, parks, biodiversity) and also impacts upon Council landholdings. Engagement has continued with all relevant areas of the Council, with more recent engagement focusing on the drafting of Local Plan policies and the review of these. The draft Local Plan (Appendix 1) reflects feedback from Service Areas (where received) and will be refined further prior to Cabinet / consultation to reflect any further feedback received.
- 4.9 Service areas have also been involved in the preparation of any evidence base documents relevant to their area.
- 4.10 An initial discussion has been held with the Greater London Authority (GLA) as the Harrow Local Plan must be in 'general' conformity with the London Plan. These discussions were general in nature, focusing on the sorts of issues that have caused issues with general conformity in other boroughs. A further discussion is scheduled after the publication of the agenda and feedback will be verbally reported to the Panel at the meeting.



- 4.11 Duty to Cooperate meetings have been held with a number of adjoining boroughs (i.e. Barnet, Ealing, Hertsmere), with others to be held shortly. The Duty to Cooperate is a requirement of the plan making process; it is largely intended to address cross-borough planning issues of a strategic nature (i.e. housing and employment need, infrastructure etc).

*Plan drafting*

- 4.12 Significant progress has been made on the drafting of the new Local Plan, culminating in the version of the Local Plan attached at Appendix 1. Section 5 below introduces the Draft Local Plan and provides a summary of its key issues / policy positions.
- 4.13 In developing the draft Local Plan, various potential policy options were considered. These are documented in the draft Local Plan, with reasonable alternatives (options) included where appropriate. Where no alternatives are considered appropriate, the reasons for this have been identified (i.e. the need to be in general conformity with the London Plan).

*New National Planning Policy Framework (NPPF) and other recent Government announcements.*

- 4.14 Since the last Local Plan report to the Panel in November 2023, there have been a number of Government announcements and the publication of policy documents. Of particular note is the publication of the revised version of the NPPF on 19 December 2023. These have implications for the Draft Local Plan, which are summarised in Appendix 3. Given the timing of the publication of the NPPF, the version of the Draft Local Plan attached at Appendix 1 does not fully reflect any necessary changes and these will be made as the draft Plan progresses towards consultation in February 2024.
- 4.15 Paragraph 230 of the new NPPF indicates that Local Plans that have not reached Regulation 19 stage consultation (i.e. consultation on the version of the plan proposed to be submitted for examination) by 19 March 2024) will be examined under the new NPPF. As Harrow's new Local Plan is expected to reach Regulation 19 consultation at the end of 2024, it will be examined under the new NPPF.

## **5.0 Draft New Harrow Local Plan (Regulation 18 version)**

- 5.1 The new Harrow Local Plan will replace the existing adopted Harrow Local Plan, which currently consists of a package of documents:
- a. Core Strategy – adopted February 2012
  - b. Development Management Policies – adopted July 2013
  - c. Harrow and Wealdstone Area Action Plan (AAP) – adopted July 2013
  - d. Site Allocations – adopted July 2013

- 5.2 These form the Council's statutory development plan, alongside the London Plan [and any future neighbourhood plans prepared by community groups ('neighbourhood forums')]. Consistent with contemporary national policy, the existing 'framework' of Local Plan documents will be replaced by a single Local Plan document.
- 5.3 The current Local Plan is accompanied by an adopted Policies Map that illustrates particular land uses throughout the Borough including areas for protection such as open space and conservation areas, as well as employment and residential activities. It also identifies key sites for development ('site allocations').
- 5.4 As noted above, the new Local Plan will cover the period from 2021 to 2041.

#### *Structure of the Draft Local Plan*

- 5.5 For legibility the Local Plan is set out in a series of thematic chapters that cover a number of policy areas however it must be read as a whole, particularly for the purpose of planning and investment decisions.
- 5.6 The Local Plan is organised as follows:
- (a) *Introductory Chapter (Chapter 01)*: Context and the spatial strategy: provides background information on the Local Plan (including Borough Profile) before setting out the Vision for Harrow and the plan's strategic / spatial objectives. It also establishes the 'spatial strategy' for the Borough, the land-use priorities and overall pattern of development that the plan will seek to deliver.
  - (b) *Thematic policy chapters (Chapters 02-10)*: these cover the policy areas that seek to deliver the spatial vision, objectives and strategy of the Local Plan, and contribute to the overarching objective of sustainable development (consistent with the NPPF and the London Plan's 'Good Growth' objectives). Each chapter includes at least one overarching strategic policy and a series of detailed policies. These chapters represent the development management policies that all planning applications will need to comply with.
  - (c) *Appendices*: covering glossary, site allocations (to be included in the next version of the draft Local Plan for 'Regulation 19' consultation), delivery and monitoring framework (will include implementation framework for the Local Plan, as well as the arrangements for monitoring and outcomes over the plan period), housing trajectory (at this stage, presented as broad capacity figures, to be refined once site allocations are progressed) and proposed changes to the Policy Map.

## *Summary of draft Local Plan*

- 5.7 Outlined below is a summary of the draft Local Plan, including key policy positions and changes from the current Local Plan. However, the nature of the Local Plan is that it covers a wide range of policy areas, types of development and different areas / constraints within the borough. It is therefore an extensive document. The draft at Appendix 1 should therefore be reviewed for detailed provisions relating to any specific aspects of interest as the summary below cannot fully reflect the extent and detail of all the policies in the draft Plan:

### *Spatial Strategy*

- A. The Spatial Vision and Strategy, and Strategic Objectives (Chapter 1) provide the overarching narrative for the document from which detailed provisions / policies follow.
- B. In general terms, the overarching spatial strategy for the Local Plan remains to direct the majority of new development to the Harrow and Wealdstone Opportunity Area, with other town centres accommodating more modest levels of growth commensurate to their character, role and function. The predominately suburban areas of the borough (outside sustainable locations) will retain their character as low-density, family housing. Green Belt, Metropolitan Open Land and Open Space will be retained and enhanced. The borough's network of town and district centres will be retained and managed to promote vibrancy and vitality. Existing employment land will be retained. Existing infrastructure will be retained, and additional infrastructure required to support the level of development envisaged by the Local Plan. Social and environmental assets will be protected and enhanced, including a net gain in biodiversity. The location and design of new development will respond to climate change.

### *High Quality Growth*

- C. This chapter outlines the design policies that will apply to all development proposals where relevant. They largely reflect an evolution of current Local Plan policies, updated in the context of the increased emphasis nationally and regionally for 'design-led' development, 'good growth' and 'beauty and placemaking'.
- D. The new Local Plan introduces for the first time a specific policy on building heights, as required by the London Plan. It defines tall buildings as being 7 storeys or 21 metres (from the ground level to the highest point of the building) across the entire borough. (Note: the current Local Plan definition is 10 storeys / 30 metres within the Opportunity Area). The draft identifies the Opportunity Area as having areas suitable for tall buildings and identifies appropriate heights in specific areas within the

Opportunity Area (based on the evidence base supporting the Local Plan). The policy also specifically indicates that areas outside the Opportunity Area are not suitable for tall buildings; the current Local Plan is comparatively silent on this (with guidance being provided by way of the recently adopted Tall Buildings (Building Heights) SPD).

### *Heritage*

- E. The draft Heritage policies are largely an evolution of policies in the existing Local Plan, updated to reflect new designations (i.e. Local Areas of Special Character) and to address weaknesses with existing policies (i.e. securing the benefits sought through enabling development of heritage assets).

### *Meeting Harrow's Housing Needs*

- F. The housing policies in this chapter commit the Council to deliver a minimum 16,040 (net) homes over the Plan period (2021-2041), based on the annual London Plan target for Harrow of 802 homes per year. The Plan specifically commits to delivery of a minimum of 8,020 homes between 2019 and 2029, as required by the London Plan. It also identifies broad locations as follows:

- (i) Harrow and Wealdstone Opportunity Area – minimum 7,500 homes
- (ii) Outside the Opportunity Area (existing permissions / allocations) – minimum 2,500 homes
- (iii) Small sites (unallocated sites below 0.25 ha and in accessible locations) – minimum 4,125 homes
- (iv) Windfall sites

At present there is a modest shortfall against the proposed housing target over the full plan period but the ten-year London Plan requirement can be met. Additional sites may come forward during the plan-making process to close the current shortfall.

- G. A key underlying element of the draft housing policies is the need to protect existing family sized housing stock (three or more bedrooms) within the borough and increase the rate of delivery of family sized housing in new development (including in flatted development). Such an approach reflects the housing need identified in Harrow's evidence base. The draft Plan therefore sets a target to ensure a minimum of 25% of new dwellings delivered are three bed (or more) family sized dwellings. Additionally, it seeks to ensure the size of any 2-bedroom dwellings is capable of accommodating 4 bed spaces, so that they can be used by families, if household circumstances change and avoid overcrowding.

- H. The draft Plan also proposes greater control over the conversion of existing family sized housing into flats by introducing a dwelling size threshold for conversions (i.e. internal floor area above 130 sqm) and a location criteria where they may be permitted (i.e. Public Transport Accessibility Levels 3-6). Additional requirements are also proposed to avoid the over concentration of flat conversions within a street. Where such a conversion is accepted, the Plan seeks re-provision of a three-bed family size home as part of any conversion.
- I. In terms of affordable housing, the draft Plan sets a strategic target of 50% affordable homes (consistent with the London Plan), with a 70% / 30% tenure split between low-cost rented tenure (with social rent as a priority) and intermediate tenure (share ownership / London Living Rent). This represents greater emphasis on low-cost rented tenure (currently Local Plan policy is for 60%) and a more genuinely affordable tenure (social rent) within the 70% (rather than 'affordable rent' tenures). The policy will apply to major development (i.e. 10 dwellings or more), which will be required to deliver affordable housing onsite to deliver mixed and inclusive communities, unless exceptional circumstances apply to make off site /or a financial contributions.
- J. Several new policies are included to reflect the requirements of the NPPF or London Plan [i.e. small sites (less than 0.25 ha), older persons' accommodation, self-build housing] or to reflect new development types since the current Local Plan was adopted (i.e. large scale purpose built shared accommodation) or where the current Plan is silent (i.e. housing estate renewal, purpose built student accommodation). The policy approach to matters such as Houses in Multiple Occupancy (HMO), supported and sheltered housing, is proposed to be strengthened in the Plan.

### *Local Economy*

- K. The policies in the Local Economy chapter respond to broader changes in society and the economy with respect to how town centres function since the current Local Plan was adopted. Only modest growth in town centre use (retail, food / beverage, leisure and entertainment) floorspace is envisaged (based on the Local Plan evidence base). With national policy and legislative changes, the scope to manage specific uses ('use classes') within town centres has been diminished, so the town centre policies seek to focus on the function of town centres in the town centre hierarchy (i.e. metropolitan, major, district, local) and promoting vibrancy and vitality of the borough's town centres.
- L. A strategic policy specifically for the Harrow and Wealdstone Opportunity Area is also proposed. This sets out the overarching principles for development within the Opportunity Area, given its

focus for new development and infrastructure within the borough. It will replace the Harrow and Wealdstone Area Action Plan. The policy provides the basis for any subsequent, detailed master plans within the Opportunity Area, such as that proposed to be prepared for Harrow.

- M. In terms of employment use (i.e. industrial, offices), the draft Local Plan seeks to protect existing industrial floorspace / yard space from any further loss as across Harrow / London, too much industrial land has been lost given recent changes to the economy (growth in data centres, warehouses for online retailing etc). A modest increase in industrial floorspace (6,000 sqm) will be sought within established industrial areas, based on the Local Plan evidence base.
- N. In terms of offices, the evidence base indicates there is sufficient office space within the borough for the plan period to 2041. However, the draft Local Plan policies will require that any loss of office space will continue to be monitored and managed in accordance with up-to-date evidence, given the current uncertainty around office space provision post-Covid. The policy identifies that when releasing office floorspace, this follows a sequential approach which seeks to ensure that office space within the Metropolitan Town Centre, and then other town centres is the least preferable to be released, compared to offices in out of centre locations.
- O. The draft plan also seeks to promote the night-time and evening economy, culture and creative industries, and tourism and visitor accommodation, reflecting the emerging importance of these elements of the economy and to support Council strategies and investment in these areas.

#### *Community Infrastructure*

- P. A new strategic policy has been included to set out the overarching approach to Social Infrastructure, and infrastructure more broadly. Policies in this chapter continue the current Local Plan approach of retaining existing community infrastructure and links the provision of new infrastructure to the emerging Infrastructure Delivery Plan (IDP) that will identify the infrastructure required to support the level of development and population growth envisaged during the plan period.

#### *Green Infrastructure*

- Q. This chapter includes a new strategic policy that sets the overarching policy direction for green infrastructure in the borough. Policy in relation to Green Belt and Metropolitan Open Land continues to reflect the national and regional policy. Open space policy continues to seek to retain open space, but has been updated to provide potential scope for essential community

infrastructure uses on open space where there are no viable alternative sites; this reflects practice in reality in recent years.

- R. The policy position around biodiversity has been updated in line with new requirements of the Environment Act requiring at least 10% biodiversity net gain from new development. The draft Plan is proposing that 20% biodiversity net gain is achieved from new development, reflecting the significantly degraded biodiversity in the borough.
- S. Policies in this chapter also seek to strengthen (and consolidate) requirements around Urban Greening, Landscaping and Trees and a new policy relating to food growing proposes to require the retention of existing allotments/community gardens and encourage the incorporation of new food growing infrastructure in developments.

#### *Responding to the Climate and Nature Emergency*

- T. This chapter includes an overarching strategic policy that sets the direction for climate change mitigation and adaptation, and the recovery of habitat. It has been informed by the recently adopted Climate and Nature Strategy.
- U. The chapter also includes a policy (Policy CN1 Sustainable Design and Retrofit) that sets the Council's definition of net zero buildings, detailing that all new development should be net zero carbon in operation considering both regulated (space heating, hot water, 'hard wired electrical equipment' i.e. lighting) and unregulated (appliances) carbon emissions, utilising on-site electricity generation and using offsetting of carbon emissions as a last resort. This is an evolution of existing London Plan policy that only addresses 'regulated' emissions. Retrofit standards for net zero have been updated in this policy.
- V. This chapter also contains policies in relation to reducing flood risk, sustainable drainage and waterway management, which have been updated from the existing Local Plan to reflect the West London Strategic Flood Risk Assessment (SFRA).

#### *Managing Waste and Supporting the Circular Economy*

- W. The policies in this chapter seek to continue to safeguard existing waste facilities in the borough (i.e. the Civic Amenity Site) and ensure adequate waste facilities in new development. Policies have also been updated to reflect emerging requirements from the Environment Act with respect to waste and recycling. The chapter also introduces the concept of the circular economy for building construction and adaptation, with a new policy that reinforces the London Plan standards for major applications and indicates that the circular economy principles

should be considered for all types of development, where possible.

### *Transport and Movement*

- X The policies in this chapter largely reflect the requirements set out in the London Plan. The overarching strategic policy reflects the Council's new Transport Strategy. Throughout the document, including in the policy relating to parking standards, provision of electric vehicle charging points is required, with the intention that these requirements exceed the minimum requirements of the London Plan; this will support the Council's recently adopted Electric Vehicle Strategy.

- 5.8 It is intended that a further summary focusing on the proposed changes from existing policies in the current Local Plan will be prepared to assist stakeholders familiar with the current Local Plan to understand these.

### *Ongoing refinement of the draft Local Plan*

- 5.9 Drafting of the Local Plan continues, as the evidence base and policies are finalised and the document compiled and prepared for consultation. The version of the draft Plan at Appendix 1 contains the policies as they currently stand and form the substantial content of the Plan which the Panel is requested to review and comment on so that comments can be reported to Cabinet and amendments can be made where necessary.

- 5.10 There are a number of outstanding elements of the Plan that will be added as the drafting process moves towards Cabinet consideration of the draft Plan and if agreed by Cabinet, formal consultation on the Plan. These include but are not limited to:

- (a) Introductory text to the Plan. This will outline the rationale for preparing a new Plan and the process and policy (national and regional) context for this. It will also outline consultation arrangements (i.e. how to make representations and the timeframes for doing so).
- (b) Inclusion of a draft policy relating to Build to Rent development, and a specific policy for Electric Vehicle (EV) Charging Points that draws together relevant elements of existing draft policies so as to more clearly articulate the requirements for EV Charging Points.
- (c) Inclusion of graphics and maps within the document to assist in conveying key elements of the Plan and to make it more user friendly and appealing. This will include insertion of a map depicting the Spatial Vision.
- (d) General formatting of the document for consistency and legibility.



- (e) Inclusion of the appendices (including an 'atlas of change' to identify proposed changes to the Policy Map that accompanies the current Local Plan).

5.11 The above will be developed ahead of consideration of the draft document by Cabinet and delegated authority (in consultation with the Portfolio Holder for Planning and Regeneration) sought to make minor amendments to the document and add any outstanding elements ahead of formal consultation (if agreed by Cabinet). Such an approach will enable the Plan to progress to consultation in a timely manner in the context of the challenging timeframes for the process and Government deadlines.

## **6.0 Next steps**

- 6.1 It is intended to present the 'first draft' (Regulation 18 version) of the new Harrow Local Plan to Cabinet in February 2024 for approval to consult for eight weeks (end of February to end-April 2024). The proposed consultation arrangements are summarised in section 7 below.
- 6.2 A summary of the consultation feedback on the version of the draft Plan attached at Appendix 1 will be presented to the Panel mid-2024, along with a revised version of the draft Local Plan.
- 6.3 A second round of consultation on a revised Local Plan (Regulation 19 consultation) is anticipated to occur by the end of 2024.
- 6.4 There has been approximately three months slippage in the Local Plan programme included in the Local Development Scheme (LDS) considered by the Panel at its meeting on 9 January 2023 (and subsequently Cabinet on 16 February 2023). This is largely due to difficulty in recruiting the additional resources for the Planning Policy Team that were included in the budget agreed by Full Council in February 2023. Such difficulty in recruitment is being experienced across London and the country generally.
- 6.5 The LDS will be updated in due course if necessary to reflect actual timeframes closer towards submission of the draft Local Plan to Government for examination.
- 6.6 As the draft Local Plan progresses through the formal process, greater weight can be given to the draft policies when determining planning applications [NPPF paragraph 48 (a)]. In this regard, the draft Plan is still in very early stages (i.e. yet to be consulted on), so limited weight can be given to the draft policies at this point in time. Additionally, the level of objection to the draft policies has not been established [para. 48(b)] (as there has been no formal consultation to-date) nor has the degree of consistency with the NPPF nor general

conformity with the London Plan been tested [para 48(c)]. These factors further diminish any weight that can be given to the draft Plan.

## **7.0 Consultation arrangements**

- 7.1 Subject to approval by Cabinet, it is proposed to undertake an eight-week consultation period on the draft Local Plan. It is intended that this occurs from the end of February 2024 to the end of April 2024.
- 7.2 There are minimum statutory requirements for this consultation, as set out in 'Regulation 18' of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) ("the 2012 Regulations"). Such minimum requirements are also reflected in the adopted Statement of Community Involvement (SCI):
- 7.3 As a minimum, the Regulations require the local planning authority to notify and invite representations on the content of the draft plan to:
- (i) such specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;
  - (ii) such of the general consultation bodies as the local planning authority consider appropriate; and
  - (iii) such residents or other persons carrying on business in the local planning authority's area as the local planning authority consider appropriate.
- 7.4 The above will be undertaken using the Council's Local Plan consultation database (email or letter). The draft Plan, supporting documents (i.e. Integrated Impact Assessment) and evidence base will be included on the Council's website. Hard copies of the draft Local Plan will be made available to view at Greenhill Library, and potentially other libraries in the borough. Documents will also be available to view at the Harrow Council Hub by appointment.
- 7.5 It is proposed to go beyond the minimum requirements set out in paragraph 7.3 above, with the intention to undertake a range of engagement tasks as follows:
- (a) Street events at several locations
  - (b) Drop-in sessions at the Conversation Café
  - (c) Online consultation hub
  - (d) E-newsletter/social media
  - (e) Webinar launch event
  - (f) Information displays/leaflets at key sites
  - (g) Email address
  - (h) Attendance at key stakeholder events
- 7.6 Representations received will be compiled, reviewed and response / actions identified, including any amendments required to the draft Local Plan. A consultation statement will be prepared documenting

the outcomes of this process and published online. It will also be reported back to the Panel mid-2024.

**Ward Councillors' comments:** None- as affects all wards. Members will be invited to make representations as part of the formal consultation process.

## Risk Management Implications

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

Separate risk register in place? **Yes**

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

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

Risk Description	Mitigations	RAG Status
Programme – slippage in the Local Plan programme and potential risk of missing the Government's July 2025 deadline for submission	<ul style="list-style-type: none"> <li>▪ Weekly programme management meetings</li> <li>▪ Additional resources secured</li> </ul>	<b>Green</b>
Consultation arrangements – these do not comply with statutory requirements	<ul style="list-style-type: none"> <li>▪ Statement of Community Involvement updated</li> <li>▪ Detailed consultation arrangements scoped and documented.</li> <li>▪ Legal / Counsel review of process (prior to Cabinet)</li> </ul>	<b>Green</b>
Draft polices not in general conformity with the London Plan resulting in objections from the Mayor	<ul style="list-style-type: none"> <li>▪ Ongoing discussions with Greater London Authority (GLA) officers</li> <li>▪ Counsel review of draft policies (prior to Cabinet)</li> </ul>	<b>Green</b>
Draft policies not consistent with national policy, including recent changes to the NPPF etc.	<ul style="list-style-type: none"> <li>▪ Ongoing monitoring of emerging / published Government policies</li> <li>▪ Assessment of implications of recent Government policy announcements / publications.</li> <li>▪ Counsel review of draft policies (prior to Cabinet)</li> </ul>	<b>Green</b>

## Procurement Implications

None – report for information and discussion only. Any procurement associated with the draft Local Plan has been undertaken in accordance with

the Council’s Contract Management Rules and have been below the value threshold for consideration by Cabinet.

## Legal Implications

The Planning and Compulsory Purchase 2004 (as amended) (“the 2004 Act”) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (“the 2012 Regulations”) set out the requirements and the statutory procedure for the preparation of a Local Plan.

Regulation 18 of the 2012 Regulations requires the local planning authority to notify and invite representations on the content of the draft plan to: (i) such specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan; (ii) such of the general consultation bodies as the local planning authority consider appropriate; and (iii) such residents or other persons carrying on business in the local planning authority’s area as the local planning authority consider appropriate. Section 7 above outlines the proposed consultation arrangements to meet these statutory requirements. Regulation 18 consultation provides an important opportunity for the gathering of critical information from landowners, developers, and site promoters to support the suitability, capacity and deliverability assessments of potential site allocations.

The next stage, after this ‘Regulation 18’ consultation, is for the local planning authority to prepare a submission draft of the local plan. All representations received during this consultation stage must be taken into account when preparing this submission draft. The submission draft will then return to the Planning Policy Advisory Panel (and Cabinet) for further consideration.

## Financial Implications

Preparation of a Local Plan is a significant undertaking, requiring resourcing for officers and revenue budget to undertake evidence base work, consultation, document production and independent examination. The resourcing is required to ensure the draft Plan is found sound as it is based on an evidence base of appropriate coverage and quality, all statutory requirements have been met (preparation of sustainability appraisals etc) and can be undertaken in a timely manner.

The estimated cost of the Local plan for 2023/24 is £399k and a growth budget of £206k is included within the Medium Term Financial Strategy (MTFS) to fund this along with other sources of funding outlined in Table 1 below. Additional resources of £171k over 2024/25 and 2025/26 have been secured within the MTFS process to fund further extra costs required to produce the Harrow Local Plan.

**Table 1**

<b>Additional costs</b>	<b>23/24 (£)</b>	<b>24/25 (£)</b>	<b>25/26 (£)</b>	<b>Total (23/24-25/26) (£)</b>
Evidence base / consultancy	212,500	177,500	30,000	420,000
Production / consultation / examination	50,000	40,000	295,000	385,000

<b>Additional costs</b>	<b>23/24 (£)</b>	<b>24/25 (£)</b>	<b>25/26 (£)</b>	<b>Total (23/24-25/26) (£)</b>
Additional officer resource	137,000	278,000	105,000	520,000
Total	399,500	495,500	430,000	1,325,000
<b>Funding sources</b>	<b>23/24 (£)</b>	<b>24/25 (£)</b>	<b>25/26 (£)</b>	<b>Total (23/24-25/26) (£)</b>
MTFS growth funding bids (22/23 and 23/24)	206,000	303,000	377,000	886,000
Grant funding received	105,000	98,739	0	203,739
Existing revenue budget (consultancy)	25,000	25,000	25,000	75,000
Internal planning resource	63,500	68,761	28,000	160,261
Total	399,500	495,500	430,000	1,325,000

Costs and funding continue to be monitored as part of ongoing budget monitoring process for the Planning Service and any significant variances identified along with mitigation measures to ensure a balanced budget position.

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

None – report for information and discussion only. Equalities Impact Assessment (EqIA) process will be fully covered in the report to Cabinet.

The Equality Act 2010 outlines the provisions of the Public Sector Equalities Duty which requires Public Bodies to have due regard to the need to:

- a) Eliminate discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010.
- b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

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

The relevant protected characteristics are age, race, disability, gender reassignment, pregnancy and maternity, religion or belief, sex and sexual orientation.

The preparation of the Local Plan is being informed by an Integrated Impact Assessment which includes an Equalities Impact Assessment.

Publishing the draft Local Plan at this stage will allow stakeholder/resident views on the content of the document and any likely adverse impacts of policies and proposals on equality groups to be identified and carefully considered prior to the preparation of the final plan document. The proposed submission version of the plan (at Regulation 19 stage) will be supported by

an updated IIA / EqIA. Consultation arrangements will consider how to best engage with stakeholders having regard to the protected characteristics.

### **Council Priorities.**

1. **Putting residents first.**
2. **A Borough that is Clean and Safe**
3. **A Place where those in need are supported.**

The wide-ranging nature of the spatial plan means that the new Local Plan will contribute to all the delivery of these priorities as well as the objective of Restoring Pride in Harrow.

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

**Statutory Officer:** Comie Campbell  
Signed on behalf of the Chief Financial Officer

**Date:** 9 January 2024 by email

**Statutory Officer:** Chileme Hayes  
Signed on behalf of the Monitoring Officer

**Date:** 9 January 2024 – by email

**Chief Officer:** Viv Evans  
Signed by Chief Planning Officer  
Viv Evans  
**Date:** 10 January 2024

**Divisional Director:** Emma Talbot  
Signed by Director for Regeneration and Sustainable Development  
Emma Talbot  
**Date:** 10 January 2024

## **Mandatory Checks**

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

**EqIA carried out:** NO – for information only. See equalities section above.

If 'NO' state why an EqIA is not required for Cabinet to take a decision

**EqlA cleared by: N/A**

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

**Contact:** David Hughes, Head of Planning Policy,  
david.hughes@harrow.gov.uk

### **Background Papers:**

Adoption of revised Local Development Scheme (LDS) – Cabinet – 16 February 2023 (item 109) - [Agenda for Cabinet on Thursday 16 February 2023, 6.30 pm – London Borough of Harrow](#)

New Harrow Local Plan – Way Forward and Strategic Objective – Planning Policy Advisory Panel – 6 March 2023 (item 33) - [Agenda for Planning Policy Advisory Panel on Monday 6 March 2023, 6.30 pm – London Borough of Harrow](#)

Statement of Community Involvement – Planning Policy Advisory Panel – 13 July 2023 (item 50) - [Agenda for Planning Policy Advisory Panel on Thursday 13 July 2023, 6.30 pm – London Borough of Harrow](#)

Draft Infrastructure Delivery Plan (IDP) Context Report – Planning Policy Advisory Panel – 18 September 2023 (item 58) - [Agenda for Planning Policy Advisory Panel on Monday 18 September 2023, 6.30 pm – London Borough of Harrow](#)

New Harrow Local Plan – draft Spatial Vision and Objectives – Planning Policy Advisory Panel – 2 November 2023 (item 66) - [Agenda for Planning Policy Advisory Panel on Thursday 2 November 2023, 6.30 pm – London Borough of Harrow](#)

Current Harrow Local Plan: [https://www.harrow.gov.uk/planning-developments#id-local\\_plan](https://www.harrow.gov.uk/planning-developments#id-local_plan)

London Plan (regional spatial strategy) 2021:  
[https://www.london.gov.uk/sites/default/files/the\\_london\\_plan\\_2021.pdf](https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf)

National Planning Policy Framework (NPPF) (December 2023) -  
[https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf)

Planning policy for traveller sites (19 December 2023):  
[https://assets.publishing.service.gov.uk/media/658198bb23b70a000d234c03/Final\\_planning\\_and\\_travellers\\_policy.pdf](https://assets.publishing.service.gov.uk/media/658198bb23b70a000d234c03/Final_planning_and_travellers_policy.pdf)

Written Ministerial Statement – ‘Planning – Local Energy Efficiency Standards Update’ (13 December 2023): [Written statements - Written questions, answers and statements - UK Parliament](#)

**Appendix 1 – Draft New Harrow Local Plan (Regulation 18 version)**



**Appendix 2 - Draft Interim Integrated Impact Assessment (IIA)  
advice note**

To be published separately

## Appendix 3 – Recent Government Policy Announcements and Implications for Draft Local Plan

### *National Planning Policy Framework (NPPF) – 19 December 2023*

1. The Government published a revised version of the NPPF on 19 December 2023. The implications of the substantial amendments to the revised NPPF on the process of preparing the new Harrow Local Plan can be summarised as follows:

- (a) the revised NPPF (paragraph 1) includes additional text emphasising that ‘preparing and maintaining up-to-date plans should be seen as a priority’ in meeting the Framework objectives to ensure locally prepared plans provide for sufficient housing and other development in a sustainable manner.

*Implications:* the Council is already working to meet Government deadlines for plan-making under the current process and is pursuing an ambitious programme to do this. ‘Sufficient’ housing in the London context is determined by the housing targets set for boroughs in the London Plan.

- (b) specific reference has inserted (paragraph 6) in relation to the preparation of Local Plans having to have regard to a Written Ministerial Statement (WMS) on Affordable Homes (May 2021), which contains policy on First Homes.

*Implications:* First Homes are not seen as being genuinely affordable in the London / London Plan context and the draft Local Plan does not identify it as a preferred affordable housing tenure. This position may need to be reviewed, noting however the NPPF only indicates WMSs ‘may be material’.

- (c) the emphasis on housing needs has been changed in the plan-making context (paragraph 15), where plans should set out a framework for ‘meeting housing needs’ (previously it was ‘addressing housing needs’). Other issues such as economic, social and environmental priorities remain as ‘addressing’.

*Implications:* Whilst ‘meeting’ is a stronger expectation / outcome (than ‘addressing’), the housing requirement (target) for Harrow is set out in the London Plan and there should be limited implications of the change on the Local Plan process.

- (d) a requirement that strategic policies / strategies ‘ensure outcomes support beauty and placemaking’ has been added (paragraph 20).

*Implications:* The draft Plan has been drafted to emphasise a design-led process. Further consideration may need to be given as to whether the policies sufficiently articulate how they will support ‘beauty and placemaking’ in the Harrow context.

- (e) Additional guidance with respect to housing need (paragraph 60) indicating 'The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community'.

*Implications:* The housing requirement (target) for Harrow is set out in the London Plan and there should be limited implications of the change on the Local Plan process. Consideration will be given to the NPPF linking of 'need' with 'an appropriate mix of housing types' given Harrow's need for housing is for a greater proportion of family size housing compared to that assumed in the London Plan / London Plan housing targets.

- (f) Additional guidance in relation to the Government's standard method of identifying local housing need (paragraph 61). The guidance indicates the standard method is 'an advisory starting point for establishing a housing requirement' and that there may be exceptional circumstances 'including relating to the particular demographic characteristics of an area which justify an alternative approach'.

*Implications:* The housing requirement (target) for Harrow is set out in the London Plan and there should be limited implications of the change on the Local Plan process. Consideration will be given to the inclusion of specific reference to 'demographic characteristics' given Harrow's need for housing is for a greater proportion of family size housing compared to that assumed in the London Plan / London Plan housing targets.

- (g) Formal inclusion of reference to the urban 'uplift' of 35% in the standard methodology, which applies to London [it basically increases the calculated housing need of an area by 35%] (paragraph 63)].

*Implications:* In the short-term, the housing requirement (target) for Harrow are set out in the London Plan and there should be limited implications of the change on the Local Plan process. The uplift will however be a consideration during the preparation of any new London Plan.

- (h) Clarification that a housing requirement (target) in a Local Plan can be higher than housing need (for example, it includes provision for neighbouring areas, or reflects growth ambitions) (paragraph 67).

*Implications:* No direct implications for the draft Local Plan as the Plan seeks to meet (not exceed) the London Plan housing target / requirement for Harrow (and that target is expressed as a minimum anyway).

- (i) Specific reference / promotion of mansard roofs as a source of new housing and an 'effective use of land' (paragraph 124).

*Implications:* The draft plan will be reviewed to ensure it meets this requirement, where appropriate in the Harrow context.

- (j) Further reference to 'beautiful' in the context of supporting 'development that makes efficient use of land, taking into account: ... the importance of securing well-designed and beautiful, attractive and healthy places' (paragraph 128).

*Implications:* The draft plan will be reviewed to ensure it meets this requirement, where appropriate in the Harrow context.

- (k) Inclusion of a caveat (paragraph 130) relating to existing provisions that seek an 'significant uplift in the average density of residential development' and 'minimum density standards' (paragraphs 129(a) and (b) respectively). The caveat indicates such uplifts maybe 'inappropriate if the resulting built form would be wholly out of character with the existing area. Such circumstances should be evidenced through an authority-wide design code which is adopted or will be adopted as part of the development plan'.

*Implications:* This caveat is unlikely to be applicable in Harrow given the London Plan emphasises design-led approach to development and has moved away from the use of minimum densities.

- (l) Specific reference to the preparation and use of local design codes being the 'primary' means of improving the design of development (paragraph 138).

*Implications:* The draft Local Plan has been prepared in the knowledge that a local design code/s would need to be subsequently prepared. The draft will however be reviewed to ensure this is adequately reflected in the document.

- (m) Revised guidance with respect to the preparation of Local Plans and Green Belt boundaries, clearly stating 'there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated' (although they may choose to do so) (paragraph 145).

*Implications:* No implications for the draft Plan as no changes to Green Belt boundaries are proposed.

- 2 Paragraph 230 of the new NPPF indicates that Local Plans that have not reached Regulation 19 stage consultation (i.e. consultation on the version of the plan proposed to be submitted for examination) by 19 March 2024 will be examined under the new NPPF. As Harrow's new Local Plan is expected to reach Regulation 19 consultation at the

end of 2024, it will be examined under the new NPPF (hence this initial review of the amendments).

*Updated Planning policy for traveller sites – 19 December 2023*

3. The Government also updated the Planning policy for traveller sites on 19 December 2023. The key change was an amendment to the glossary to broaden the definition of Gypsies and Travellers in response to a Court of Appeal ruling in October 2022 that the 2015 version of the policy discriminated unlawfully against those who had been forced to give up their nomadic lifestyles due to disability or old age. The draft Local Plan was prepared in the context of the Court of Appeal decision / potentially wider definition and with clarity from Government, will be reviewed and amended accordingly prior to Regulation 18 consultation.

*Written Ministerial Statement – ‘Planning – Local Energy Efficiency Standards Update’ – 13 December 2023*

4. Finally, a written ministerial statement (WMS) was issued on 13 December 2023 in relation to ‘Planning – Local Energy Efficiency Standards Update’. This statement seeks to limit local planning authorities proposing local energy efficiency standards for buildings that go beyond current or planned building regulations unless they can demonstrate that development remains viable and any additional requirement is expressed using the approach / assessment set out in the Building Regulations. This WMS may therefore have implications for the proposed approach to energy efficiency / carbon emissions in the draft Local Plan as it proposes to use a wider definition of zero carbon than the Building Regulations. The evidence base for the proposed approach was developed with 17 other London boroughs and the implications of the WMS will be discussed on a pan-London basis and with the GLA.

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# Chapter 00: Introduction

# Introduction

XXX

# **Chapter 01: Borough Profile, Spatial Vision and Objectives**

## Borough Profile

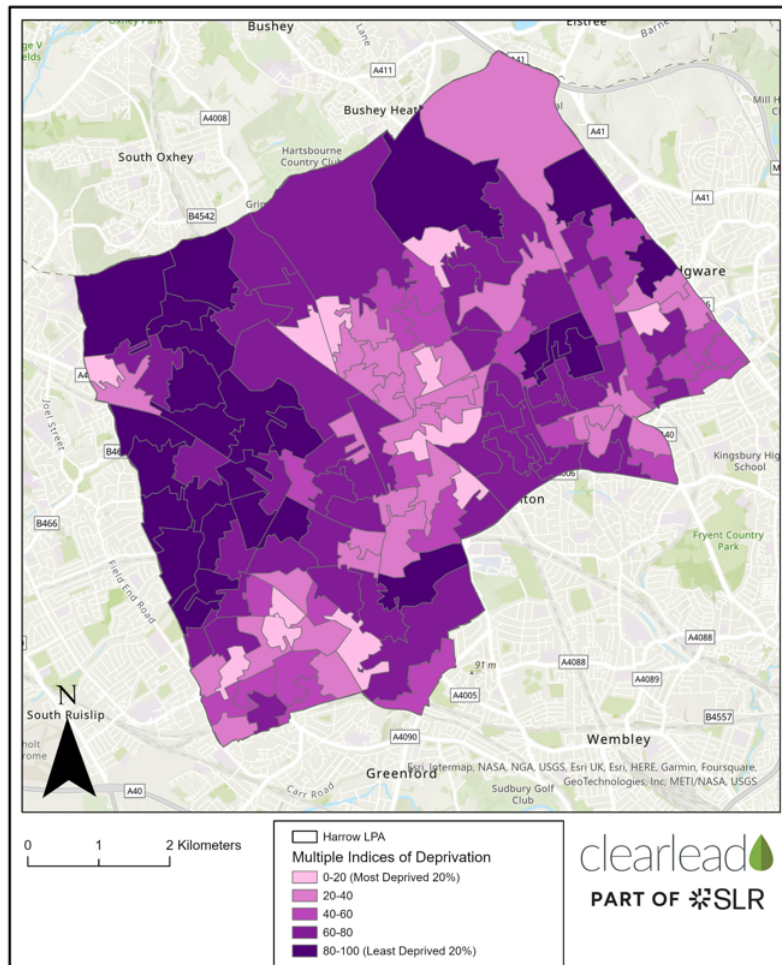
<b>People</b> (Census data 2021)	
Population	Harrow has a resident population of approximately 261,200. In the ten years between 2011 and 2021 the borough saw a 9.3% increase in population compared to the London average of 7.7%.
Age profile	Harrow has fewer people in the 20-35 year age brackets than the London average. Harrow has slightly more younger people (<19 years) and more older people (60+) than the London average.
Marital Status	Harrow has a higher proportion of people married or in a civil partnership compared to the London average.
Country of Birth	There are a significantly higher proportion of Harrow residents born outside the UK compared with London averages, highlighting higher than average levels of diversity.
Ethnic Background	There are a significantly higher proportion of Asian, Asian British or Asian Welsh residents in the borough compared with London averages.
Ethnic Background	Harrow is one of the most culturally diverse local authorities in the UK, with over 60% of residents being Black, Asian, Multi-ethnic or Other ethnic group.
Religion	Of Harrow's resident population 83.5% identify as having some form of religion. The most prominent religion is Christianity (33.9%), followed by Hinduism (25.8%), Islam (15.9%), Judaism (2.8%), and Buddhism (1.1%). Over a tenth of the borough identify as having no religion.
Health	Harrow is a generally healthy borough considering the age profile of residents, many of whom are quite elderly. It should be noted that the 2021 Census was undertaken during the Covid-19 Pandemic which may have influenced how people perceived and rated their health.
Disability	According to Census data, there are slightly lower levels of disability in Harrow compared with London averages.
Proficiency in English	Harrow residents have lower levels of English spoken as a main language, which is likely to be reflective of the ethnic diversity in the borough. As noted in the Harrow Economic Strategy, Black, Asian and Multi-ethnic residents are more likely to experience barriers to employment due to lack of English language, functional and digital skills.
LGBTQIA+	2.03% of Harrow residents aged 16 years and over identify as being part of the LGBTQIA+ community.
<b>Homes</b> (Census Data 2021)	
Household Size	Harrow has significantly larger households than the London average. 32.5% of households have 4 or more people compared to the London average of 24.1%.

Household Size	Harrow has a significantly lower proportion of lone person households (12.1%) than the London average (20.1%).
Accommodation Type	Harrow is a lower density housing borough. There are a significantly greater proportion of whole house or bungalow homes in the borough than the London Average, this is reflective of a more suburban outer London Borough.
Accommodation Type	There are significantly lower proportion of flats in the borough than the London average.
Occupancy rating for bedrooms	Harrow has slightly fewer spare bedrooms in houses than London averages, and more 2+ occupancy bedrooms in the borough than the London average.
Household Tenure	Harrow is a high home ownership borough. There are higher rates of outright ownership of houses compared to London averages, and higher rates of ownership with a mortgage or loan than the London average.
Household Tenure	There are significantly lower rates of social rented housing in Harrow compared to the London average.
<b>Infrastructure</b> (Census Data 2021)	
Car Ownership	Harrow has significantly higher rates of car ownership (75.2%) compared to the London average (57.9%).
Working from Home	Harrow has lower rates of residents working predominantly from home compared with London averages. It should be noted that this census data is from 2021 during the Covid-19 Pandemic, during which time a higher proportion of people were working from home.
Distance to work	Harrow workers travel further to get to work, having higher rates of residents travelling 10-30km to get to work than the London average.
Method of travel to work	Harrow has significantly higher rates of car use to get to work compared with the London average, and lower levels of bus and non-underground train usage as a method of transport to work. Harrow has significantly lower rates of cycling and walking as a method of travel to work compared with the London average.
Sustainable Travel (Living Harrow: The London Borough of Harrow's Climate and Nature Strategy 2023-2030)	Over the 3-year period from 2017/18 to 2019/20, 23.5% of journeys in Harrow were made by public transport, 28.7% by walking and 0.8% by cycling, to give an overall number of journeys by sustainable means of 53%. This compares to an outer London average of 55.1% and 64.8% for London as a whole.
Waste Management (Living Harrow: The London Borough of	Harrow has the highest residual waste levels in West London, with an average of 619kg of residual waste produced by each household in Harrow. The borough's recycling rates of 35.70% are better than the London average of 32.7%

Harrow's Climate and Nature Strategy 2023-2030)	
<b>Economy</b> (Harrow Economic Strategy 2023)	
Unemployment	Unemployment in Harrow has almost doubled since the pandemic. In June 2019, 1.8% of working age residents aged 16 to 64 were out of work, this had risen to 3.6% in February 2023
Qualifications	17.4% of Harrow residents have no qualifications and are furthest away from the job market. More support is required for entry level qualifications.
Job Density	Job density measures the number of jobs per working age resident and in 2021 the figure for Harrow was 0.509. This is significantly lower than neighbouring boroughs and is the lowest in the West London Alliance (WLA) region.
Resident Earnings (2022 ONS annual survey of hours and earnings - resident analysis)	Average full-time weekly earnings in 2022 for Harrow residents (£798.8) were higher than the averages in neighbouring boroughs Brent and Ealing, as well as London.
Resident Earnings Wage Gap (2022 ONS annual survey of hours and earnings - resident analysis)	There is a significant gender wage gap in Harrow. Average full-time weekly earnings for men (£882.6) were significantly higher than those recorded for women (£695.0).
Wages in Harrow	Wages paid by Harrow's businesses are below the London average, with all those that are employed in the borough having gross weekly earnings of £514.20, which is 37% less than the London average of £815.90.

Deprivation  
(English Indices  
of Deprivation  
2019)

Harrow is ranked 207<sup>th</sup> most deprived local authority in England, out of 317, (1 being most deprived and 317 being least deprived).  
Harrow is the seventh least deprived London Borough in the Index, although it should be noted that this data was recorded pre-pandemic and unemployment in Harrow has nearly doubled since.  
While resident earnings are generally high in comparison to neighbouring boroughs, there are still pockets of deprivation in the borough, these are highlighted in the map below.



Businesses

There has been a decline in the number of Harrow businesses surviving beyond five years which fell from 44% in 2020 to 40.9% in 2021. This is likely reflective of a business base dominated by micro-businesses who are likely to have struggled to stay open after the pandemic and face barriers to accessing finance.

<b>Environment</b> Living Harrow: The London Borough of Harrow's Climate and Nature Strategy 2023-2030	
Open Space	Approximately 20% of the borough's land by area is identified as open space. These open spaces comprise more than 80 areas, including parks, allotments, nature reserves and cemeteries.
Biodiversity	Harrow has 44 designated Sites of Importance for Nature Conservation (SINCs), which includes Bentley Priory Nature Reserve, the borough's only Site of Special Scientific Interest (SSSI).

## Spatial Vision and Strategy, and Strategic Objectives

### Spatial Vision

In the year 2041 Harrow will continue to be a thriving outer London Borough, helping London to grow sustainably while maintaining its own identity. There will be a resounding sense of pride in Harrow, it is a place that people want to live, work and visit.

Development will respect the character of the borough and its capacity to evolve over time.

The diverse Harrow community will benefit from an ever-improving quality of life, having a well-connected borough that provides excellent local access to a range of facilities, services, housing, employment, and nature.

Harrow will be a clean and safe borough where residents can settle in homes that suit the needs of their household and lifestyle.

Residents and businesses will benefit from the creation of sustainable neighbourhoods where housing, local services, employment, and facilities are within walking and cycling distance. Residents will be healthier and happier due to localised provision of goods and services.

Town centres will be revitalised through innovative measures adapting to their changing roles as places of leisure, arts and culture, in addition to work and retail hubs. Town centres will be exciting places for people to live should they choose.

The borough has been responding to the climate emergency and seeing the benefits of taking early action to improve our environment. New developments are energy efficient and carbon neutral. Retrofit of older building stock has been encouraged and facilitated to minimise emissions and ensure residents have cheap, clean energy.



Air quality will have significantly improved through shifts to sustainable transport and electric cars. Active transport and EV infrastructure has been bolstered to facilitate the transition. Recycling rates will be some of the best in London.

The borough will see increased rates of biodiversity through the protection and enhancement of existing green spaces, and the provision of additional spaces alongside development. The green belt and metropolitan open land will continue to be the lungs of the borough through enhancement projects.

**Spatial Strategy:** (note, quantum of development subject to ongoing evidence base work)

By 2041, new development and economic growth will provide a minimum 16,040 (net) new low-carbon homes, create over 1,000 additional new jobs and fund significant local infrastructure improvements that benefit Harrow's diverse community.

The high-quality carbon neutral design of new development will contribute to local distinctiveness, creating clean, green and healthy spaces that foster community pride, whilst also delivering on the council's climate and nature objectives.

Comprehensive and coordinated regeneration activity will continue to positively transform the Harrow & Wealdstone Opportunity Area, delivering a minimum of 7,500 additional new homes, and 1,000 additional new jobs.

Harrow town centre will continue to be a vibrant and attractive Metropolitan Centre having benefited from additional arts, leisure, and culture facilities. Adaptable mixed-use and residential development will ensure that there is continued vibrancy in the centre. Employment uses will be bolstered attracting and retaining an array of adaptable businesses and workers to the area. The centre will be the primary location for central public services ensuring high-quality services and facilities are accessible to all. The town centre will benefit from increased connectivity with other parts of the borough, and beyond through sustainable transport linkages.

Wealdstone will strive to become a vibrant centre, with its own distinctive identity. The centre will be a vibrant hub supported by local residents and a strong business community, whose presence has been transformed by the intensification of employment and carefully managed redevelopment of surrounding industrial estates.

The Station Road corridor will have benefited from redevelopment and environmental improvement linking the Wealdstone and Harrow town centres together.

Harrow-on-the-Hill Station, Harrow Bus Station and Harrow & Wealdstone Station will be accessible major public transport nodes with step free access. Harrow-on-the-Hill station and surrounding area will benefit from a comprehensive redevelopment providing a new focal point for the Harrow Town Centre comprising retail, leisure, office and residential uses. This redevelopment will have contributed to a vibrant new character achieving high standards of sustainability, public realm and residential quality.

Improved pedestrian connectivity and wayfinding between Harrow town centre and Harrow-on-the-Hill will increase legibility in both locations.

The borough's other town centres will accommodate development opportunities commensurate to their character, role, and function.

The Borough's Metropolitan Open Land, Green Belt and other open space will be maintained and enhanced as an interconnected network of green infrastructure and open watercourses supporting biodiversity and healthy lifestyles. Access to green infrastructure will be enhanced.

The quality and accessibility of open space will be maintained, and better provision for children's and teenagers' accessible recreation and playspace will have been made.

Harrow's identified heritage assets and historic environment -will continue to be valued, conserved, enhanced and celebrated. Areas of special character and architectural significance will be protected.

North Harrow District Centre will be restored as a vibrant local shopping and service centre meeting the needs of residents and supporting local business.

The vitality and character of Pinner High Street will have been preserved and enhanced.

In Stanmore, mixed use retail and residential development will have strengthened its function as a District Centre, access to natural green space will be maintained and accessible to residents and visitors.

Partnership working with the neighbouring boroughs of Barnet and Brent will have secured co-ordinated public realm enhancements to Edgware, Burnt Oak, Kingsbury and Kenton centres, and will have provided improved connectivity between Kenton Station and Northwick Park Station.

Appropriate development will occur on small, brownfield sites in sustainable locations close to town centres, and train and underground stations.

The leafy, suburban character of the Borough's residential Metroland areas, outside sustainable locations, will have been safeguarded as areas of low density, family housing.

Optimising development opportunities on sites across the Borough will provide high quality housing to suit the needs of a range of residents, while respecting the appearance of residential character areas.

Employment land will be directed to appropriate locations remaining flexible and adaptable to meet current and future needs. A sufficient supply of industrial land will be provided and maintained to meet current and future needs.

Harrow will maintain or increase its market share of retail expenditure to secure the vitality and viability of the Borough's town centre network and meet local needs.

## Reasonable Alternatives

**Retain existing spatial strategy** – the proposed spatial strategy is considered an evolution of the existing strategy, in that it directs the majority of growth to the Harrow and Wealdstone Opportunity Area. It is however considered that the current strategy needs updating to respond to increased housing targets in the London Plan and changes in the economy and broader society since the current the Core Strategy was adopted in 2012. It also needs to respond to environmental issues such as climate change and biodiversity.

**Seek to go beyond the level of development identified in the proposed strategy** – such an approach would go beyond the minimum housing targets set for Harrow in the London Plan, and beyond the objectively assessed need for employment, retail and cultural / leisure floorspace. Such an approach would meet a greater proportion of the Borough's Objectively Assessed Housing Need (as calculated by the Government's Standard Methodology) for housing. To do so however would require developing green field / Green Belt / Metropolitan Open Land sites, employment land, sites in less sustainable locations within the boroughs, or at densities and heights significantly above the predominantly suburban nature of most of the borough. Such an approach would risk being contrary to the evidence base informing the Local Plan (such as the need to retain open space and employment land, the Characterisation study of the borough, or NPPF / London Plan requirements relating to Green Belt / Metropolitan Open Land). It would however contribute to closing the gap between minimum London Plan housing targets for the borough and actual objectively assessed need and is considered a reasonable alternative, but not the Council's preferred option when the NPPF and London Plan are considered in their entirety.

Other options / alternatives relating to level of housing and non-housing development are covered in their respective Chapters / strategic policies.

## Strategic Objectives:

<b>Our Local Identity</b>	<p>Retain, reinvigorate and reinforce the local distinctive character of Harrow's communities by ensuring new development responds positively to the special attributes of its local context.</p> <p>Respecting the cultural, historic, built and natural environments</p> <p>Ensuring new development is designed, constructed and maintained to a high standard.</p> <p>Conserve and enhance the historic and cultural environment, promoting understanding and appreciation of it. Working with stakeholders to sustain the value of local heritage assets including the international value of Harrow School.</p>
<b>Infrastructure</b>	<p>Harrow's infrastructure will continue to meet current and future demand through high quality and timely provision. Development contributions will be used to ensure that the community continue to enjoy access to all forms of social and physical infrastructure, including education, health care, recreation and cultural facilities.</p>
<b>Transport</b>	<p>Sustainable transport infrastructure will be delivered to ensure there are healthy and safe alternatives to private vehicles. The council will facilitate modal shift away from fossil fuel car use.</p>
<b>Air quality</b>	<p>Air quality improvements will continue to be made through high quality design, spatial planning and sustainable infrastructure improvements.</p>
<b>Open Space</b>	<p>The quality of existing open space will be improved, and new open space provision will be facilitated. Public access to open space will be increased.</p>
<b>Biodiversity</b>	<p>The borough's biodiversity will be protected and enhanced, with greenbelt and MOL land becoming a thriving example of biodiversity uplift.</p>
<b>Climate Emergency</b>	<p>Harrow will reduce its contribution to climate change through facilitating net zero development where possible, minimising our reliance on fossil fuels, promoting retrofitting and energy efficiency, and utilising sustainable design methods. Harrow will improve its resilience to climate change through adaptation.</p>
<b>Waste and Recycling</b>	<p>Harrow will continue to minimise waste and increase recycling rates in line with circular economy principles.</p>

<b>Housing</b>	Harrow will facilitate the delivery of new housing from a range of sources to meet the diverse range of housing needs of a growing population and demographic changes. This will be located within the most sustainable locations of the Borough such as the opportunity area, town centres and sustainable locations to protect, enhance and positively evolve the character of the suburbs.
<b>Affordable Housing</b>	Maximise delivery of genuinely affordable housing to meet the needs of residents.
<b>Mixed and Inclusive Communities</b>	Promote inclusive, mixed sustainable communities, through ensuring high standards in new housing and opportunities to build social interaction, to create cohesive, healthy communities enabling the older population to remain independent and active for longer, as well as providing specialised housing options to meet the needs of vulnerable residents.
<b>Housing Types</b>	Promote a range of well-designed housing types and sizes, to cater for the needs of an ageing population, younger households with children, and multigenerational families.
<b>Local Economy</b>	<p>Harrow will continue to play an important role in the wider London economy, including cultural, creative and digital industries.</p> <p>Employment opportunities will be retained and promoted in appropriate employment locations.</p>
<b>Town Centres</b>	Town centres (including Metropolitan, District and Local centres) will continue to be attractive, vibrant hubs for investment containing appropriate town centre uses, including thriving evening and night-time economies.

# **Chapter 02: High Quality Growth**

## Strategic Policy 01: High Quality Growth

*Linkages:*

*NPPF Chapter 11: Making effective use of land*

*NPPF Chapter 12: Achieving well-designed places*

*London Plan Chapter: Planning London's Future – Good Growth*

*London Plan Chapter 3: Design*

### **Strategic Policy 01: High Quality Growth**

Development in Harrow must be of a high quality to ensure proposals relate well to the existing character of the Borough, whilst ensuring new development makes effective use of land and provides necessary uses for Harrow residents.

- A.a Harrow has a range of unique character areas. The Harrow & Wealdstone Opportunity Area is able to accommodate growth and higher density development, whilst the smaller centres and the strong suburban Metroland character areas are much more sensitive to change. The Council will support design-led developments which respond positively to the character and context of the location within which they are proposed. By following a design-led approach to new development, proposals will make optimal use of land in accordance with the requirements of the development plan. The Council will support contemporary architecture where appropriate, providing it does not harm or detract from an existing context or architectural character. This is particularly important in relation to heritage assets across the borough.
- b. New development and growth will predominantly be directed into the Harrow & Wealdstone Opportunity Area. New development within the Opportunity Area will by its nature be more intensive than elsewhere in the borough, due to the character of the area and its proximity to public transport and infrastructure. The Opportunity Area contains two town centres. The design of development and uses in these areas must be appropriate, improving the vitality and vibrancy of the centres and ensuring development remains at a human scale.
- c. As set out in the London Plan (2021) tall buildings can play a role in the delivery of growth within the borough, particularly to assist in meeting the required housing target. The Council will support appropriate tall building developments that are located within designated tall building zones, and are of a high-quality design, appropriate height, and that provide for a mix of homes or employment opportunities for Harrow residents. Proposals should demonstrate compliance with Policy GR4 (Tall Buildings) of the Local Plan.
- d. Suburban Harrow has a strong character predominantly made up of 2 to 3 storey properties. Whilst it is acknowledged that character will evolve over time, new development within the suburban areas should respond positively to the existing character, ensuring that the Metroland and Village characteristics are respected and retained. Larger scale development opportunities may arise within the suburban area, but must respect the suburban context, and tie in satisfactorily to the wider character context and fabric.



- e. Across the Borough there are areas of special character, which provide strategic landscapes and distinctiveness to the Borough. The Council will manage development within these locations to ensure that they are not harmed.
- f. The Council will allocate sites and set out design parameters to assist applicants in understanding the intended scale of development to ensure a site is fully optimised whilst respecting the character of the area it is located in.
- g. Development proposals should demonstrate a level of effective public engagement commensurate to the scale of development.
- h. The design of new development must consider wider policy objectives as set out within the development plan.

### **Supporting Text:**

Land is a finite resource and therefore development must optimise land to ensure that the spatial strategy is achieved. In order to meet the ambitious targets set by the London Plan and local evidence base requirements, new development must be delivered to accommodate these growth requirements. Design-led schemes will result in land being used optimally, whilst ensuring that the prevailing pattern of development of the area is safeguarded. Whilst the character of an area will evolve over time, a comprehensive design led development, that follows relevant guidance, will ensure that changes are gradual and sensitive to the prevailing pattern of development. High quality development should not appear at odds with the character and context of the site and surrounds, and must ensure the build quality allows it to remain a good example of design for the lifetime of the development.

Much of Harrow is comprised of suburban residential areas which were formed by the expansion of the railways north out of London. A strong suburban character still exists, with marginally taller town centres punctuated across the borough. The Harrow Metropolitan Town Centre and Wealdstone District Centre form part of the Harrow & Wealdstone Opportunity Area (as defined in the London Plan (2021)), which provides a notable difference in character. Over the previous Local Plan period, the Harrow & Wealdstone Intensification Area (later renamed the Opportunity Area) has been the focus for development in the borough, given the town centre locations and highly sustainable nature of the defined area. A number of allocated sites within the Opportunity Area have been delivered, delivering a higher quantum of development than initially envisioned through larger scale height and density.

Across the plan period, the Harrow & Wealdstone Opportunity Area will remain a focal point for development. New development must respond to the different character areas within it, which comprise suburban residential, large scale development opportunities and town centre locations.

Outside of the Harrow & Wealdstone Opportunity Area there is a noticeable suburban character predominately made of 2 to 3 storey buildings.

Almost two-thirds of Harrow's housing stock dates from the inter-war period. Significant neighbourhoods of semi-detached and short terraces appeared rapidly as

fields became homes, gardens, streets, parades and recreation grounds. This 'Metroland' housing continues to be one of the principal characteristics of Harrow's suburbs, particularly to the south east and south west of the borough. The characteristics of the developments that shaped Harrow over that time, are still prevalent across suburban Harrow today. New development therefore should be brought forward in a manner that ensures the unique characteristics of Metroland are maintained across suburban Harrow, and not eroded overtime by inappropriate development. To assist with new development in the suburban areas of Harrow, developments should take consideration of the guidance set out within the Harrow Tall Buildings (Building Heights) Supplementary Planning Document (2023) and the wider development plan policies.

The Harrow Characterisation and Tall Building Study (2021) provides a borough wide analysis of the character of Harrow. It sets out general building heights, plot sizes, building typologies, land uses, and identifies the distinction between the urban, suburban and semi-rural parts of the Borough. It forms a useful starting for proposals to assist in understanding the character and context in which a development seeks to occur, and therefore how a proposal is able to evolve to ensure a high-quality design appropriate for its context is achieved. This study should be the starting point for any design led development. New development proposals should address this evidence base document as a starting point, then provide a more localised context analysis to support any application.

New development must consider the policies of the wider development plan, ensuring that proposals deliver on all relevant requirements for a successful development. The delivery of high-quality design is not limited solely to the external appearance of a building, as the wider site and context must also be addressed. Where public realm is required to be delivered, this must be of a high-quality finish and address secure by design principles and be supported by appropriate infrastructure. High quality design also includes ensuring that where a residential use is proposed, the amenity, space and access requirements, of future occupiers meet the policy requirements set out in the development plan.

New development will result in change to an area, and the potential impacts will vary depending on the scale of development and the context within which development is located within. The impacts of such development are felt by communities that live in these areas, and they should have an influence on the final development scheme that is submitted for planning permission. Major applications should ensure that early and effective engagement has been undertaken with the local community, and demonstrate the level of engagement and how feedback has been positively incorporated into the final submission to the Council.

The Council recommend that applicants take advantage of the pre-application service prior to submission of any planning application. This service provides applicants the opportunity to ensure proposals are able to be brought forward with the best opportunity to be policy compliant and therefore receive a positive outcome. Major applications and those that are contentious are also able to take advantage of Planning Performance Agreements to provide continual dialogue between applicants and the Council to look to address multiple issues over what can be a lengthy design evolution process. As part of this, applicants should engage with the Council's design review process. This process engages external professionals who are able to review and provide advice to applicants to assist in evolving a scheme to ensure it meets the

exemplary design that best optimises the site and achieves a scheme that is appropriate for its context.

**Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy GR1: Achieving a High Standard of Development

*Linkages:*

*NPPF Chapter 11: Making effective use of land*

*NPPF Chapter 12: Achieving well-designed places*

*London Plan Chapter 3: Design*

### **Policy GR1: Achieving a High Standard of Development Design and Layout Considerations**

- A. All development proposals must achieve a high standard of design and layout that respects the character and context of the locality that it is proposed in. Proposals which fail to achieve a high standard of design and layout, or which are detrimental to local character and appearance, will be resisted.
- B. To ensure the most efficient and optimal use of land, proposals must take a design led approach by;
  - a. Responding appropriately to the local context in terms of building height, bulk, massing, footprint, building line, scale and existing design characteristics;
  - b. Incorporating durable high-quality materials that reflect local character and ensure a high quality appearance is maintained over the lifetime of the development;
  - c. Providing high quality (hard & soft) landscaping, amenity space and play space to support the overall quality of a successful development. Proposals should seek to retain or enhance existing landscaping, biodiversity or other natural features of merit.
  - d. Include appropriate sustainability measures and contribute where feasible to the circular economy.
  - e. Residential development must comply with National Prescribed Space Standards & London Plan Minimum Internal Space Standards for New Dwellings.
  - f. Ensuring designs are human in scale at ground floor;
  - g. Secure by Design principles should be considered at an early design stage, including ensuring that development deters and is resilient to terrorism and emergencies; and
  - h. Ensure that development complies with the standards set out in the London Plan, and this Local Plan.

#### **Residential Amenity**

- C. Proposals should ensure amenity for existing and future occupiers would be safeguarded, in relation to:
  - a. Adequate daylight, sunlight, privacy and outlook for adjoining and future occupiers and users within its context;
  - b. The adequacy of the internal layout of buildings in relation to the needs of future occupiers and any impact on neighbouring occupiers;

- c. Appropriate levels of amenity space in terms of both quantum and quality for future occupiers;
  - d. Applying the Council's 45-degree code where relevant to ensure appropriate relationship between buildings, primary facing windows to habitable rooms and outdoor private amenity space; and
  - e. The impact of the proposed use and activity on noise, including hours of operation, vibration, dust, air quality and light pollution on future and existing occupiers.
- D. Proposals that conflict with B and C above will be resisted.
- E. In addition to B and C above, proposals seeking to extend homes and / or convert into multiple homes should address further guidance published by the Council on such matters.
- F. Development which would prejudice the future development of other parts of a site, adjoining land, or which would frustrate the delivery of adopted plans and allocated sites, will be resisted.

### **Supporting Text:**

The spatial strategy / vision sets out the overarching strategy for ensuring new developments are of a high-quality design and do not impact on residents' amenity.

This Policy provides details on the key elements of good design, layout and amenity that need to be considered for all scales of development ranging from major development schemes to residential extensions and conversions. New development and changes of use proposals offer the potential to strengthen the valuable components of the Borough's existing built environment whilst realising the opportunity of previously developed land to meet future housing and economic needs without loss of open space.

The massing, bulk, scale and height of buildings are significant components of an area's character, and help to convey the distinction between urban, suburban and semi-rural parts of the Borough.

Quality of execution is key to the realisation of design success, and in this regard the materials, colour, entrance and window details, external services and telecommunications equipment can significantly detract from a building's finished appearance, particularly in mixed use and multi-occupancy developments.

The design of the spaces between buildings, both private and public, are key to the quality of the environment and the experience of those who use them. This includes hard and soft landscaping, natural features, boundary treatments, waste and cycling enclosures. The provision of appropriate space around buildings will frequently be informed by the character and pattern of development in the area, which will in turn be relevant to the appropriate gaps and distances needed to safeguard the privacy and amenity of neighbouring occupiers. Space around buildings is important not only as a setting for the building in its context, but also for reasons of functionality. It enables the implementation and successful growth of landscaping schemes, biodiversity net gain, provides an outdoor amenity for occupiers and space for refuse storage, car parking etc. It may also be an important element of a site's plan for the sustainable

management of flood risk and surface water drainage. Proposals should optimise the use of a site to ensure that there are no 'left over' spaces that are neither functional nor visually beneficial.

Landscaping should be included as an integral part of the overall design of a development proposal, in line with Policy GI4 Urban Greening, Landscaping and Trees. The landscape and buildings need to be considered together from the start of the design process and careful consideration given to the existing character of the site including its typology and existing trees and landscape.

All new development should be resilient to terrorism and other emergencies. It should consider secure by design principles, and design responses should be proportionate to the potential risk commensurate to the development. Major developments should engage with Metropolitan Police (Counter Terrorism Security Advisors) to ensure appropriate design solutions are incorporated to deter terrorism whilst maintaining a high quality of development.

The prevailing building height in Harrow's suburban areas is two storeys, whilst the Borough's district and local centres have prevailing heights of two and three storeys. Development within these character areas should be considered against the Tall Building (Buildings Heights) Supplementary Planning Document, which provides guidance on context analysis and design.

The standard of privacy and amenity achieved by development will be closely related to the application of design and layout considerations set out above. Protecting privacy and amenity helps to protect the well-being of the Borough's residents. This concerns the need to protect both future occupiers of new development, as well as the living conditions of neighbouring occupiers or (for mixed use development) the viability of business premises.

Sunlight, daylight and outlook are highly valued components of residential quality that need to be considered early within the scheme design, especially where they add to the sustainability and attractiveness of the development. In addition to impacts on neighbouring development, the consideration of satisfactory sunlight, daylight and outlook applies equally to the proposed building(s) on site.

Outdoor spaces provide a valuable amenity for occupiers and should have a configuration and relationship with buildings which secure a high level of functionality and environmental quality. The provision of amenity space should consider access for all and provide children's play space in accordance with Policy S4 (Play and informal recreation) of the London plan (2021).

The Council applies the 45-degree code which is a tool used to help to ensure that visual impacts are appropriately contained, and that reasonable levels of light and outlook are maintained. The Code should not simply be applied on a mechanical basis but as part of an assessment of the site considerations listed above. No part of any new extension should interrupt a 45° splay drawn on plan from the nearest first floor or two storey front or rear corner of any adjacent dwelling, or from a single storey rear corner if that rear elevation has a 'protected' window. This would include projecting roof eaves, but not shallow fascias or guttering.

Privacy and amenity considerations do not stop at the external relationship of buildings and spaces. Noise transfer between dwellings can be as critical to privacy as

overlooking, whilst lack of provision for domestic storage space can lead to the use of features which are meant to provide amenity, such as balconies and garages, for this purpose. Whilst the quality of sound insulation is a matter for Building Regulations, the internal layout of rooms can help to mitigate transfer of unwanted noise between homes. The provision of built-in storage is a requirement as set out within the London Plan (2021), along with other policy requirements to ensure high quality living accommodation is delivered. The Mayor of London's Housing Design Standards LPG (2023) provides further guidance to assist new development achieve address matters in relation privacy and amenity.

The London Plan (2021) has introduced the Agent of Change principle (Policy D13), which places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. New residential development must therefore mitigate against nearby lawful noise generating activities, to ensure satisfactory living conditions for residents, whilst ensuring lawful noise generating activities are able to continue to operate without undue pressure from noise sensitive uses.

Major applications will be subject to a greater level of scrutiny where the scale and intensity is likely to have greater impacts on the character of an area and potential harm to residential amenity.

**Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy GR2 Inclusive Neighbourhoods

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter XX:*

### Policy GR2 Inclusive Neighbourhoods

- A. The location, design and layout of development, and any associated improvements to the public realm, transport and other infrastructure, will be required to contribute to the creation of inclusive neighbourhoods. In particular:
- a. Non-residential development and change of use proposals must be appropriately located to sustain town centres, neighbourhood parades and local employment opportunities;
  - b. Non-residential development and change of use proposals must be accessible to all and with dignity;
  - c. New residential development and conversion proposals must provide accessible homes, ensuring good access to services and facilities, and;
  - d. All proposals must be safe and secure for Harrow's diverse population in line with Secured by Design principles.
- B. Major proposals will be expected to demonstrate how they contribute to the creation of inclusive neighbourhoods within and beyond the site boundary. Where appropriate this must include public realm improvements to enhance permeability and useability for walking & cycling and compliance with Local Plan Policy GR3 (Public realm and connecting places) and Policy M1 (Sustainable Transport).
- C. Major development within town centres including proposals for public buildings, visitor attractions and tourist accommodation, and Green Grid projects, should make appropriate provision for the comfort and convenience of all users, including those with special mobility requirements.
- D. Sensitive adaptations of heritage assets which contribute to the creation of lifetime neighbourhoods will be supported, taking into consideration other relevant development plan policies.

### Supporting Text:

A high quality, inclusive and accessible environment benefits the quality of life for visitors and residents alike. It allows everyone to move around more easily and enables residents at all stages of the life cycle to remain in situ as part of the local community, including families with small children, older people and those with mobility impairment. New development must provide inclusive design in line with London Plan



standards, that ensures the creation of neighbourhoods that respond to the diverse population of both Harrow and London.

This policy also applies both to new development and to secure adaptations to existing buildings through changes of use, conversions, alterations to non-residential buildings and proposals for new shopfronts. Recognising that adaptations to existing buildings are often more challenging, this policy does not apply to householder applications where it might be disproportionate, but it can be followed voluntarily where substantial extensions are proposed.

The design and layout of all proposals can help reduce crime through providing for increased activity, natural surveillance, access control and creating a sense of ownership. New development should consider Secure by Design principles at an early design stage, including early liaison with the Metropolitan Police to identify site (and wider) issues that currently exist. [Footnote; http://www.securedbydesign.com/](http://www.securedbydesign.com/)

While the design and layout of all development should achieve full integration into the area within which the site is located, major development proposals provide an opportunity to extend inclusive design principles beyond the site boundary to achieve, for example: enhancements to the pedestrian environment and cycle routes between the site and local destinations; the creation of an accessible and integrated public transport network and public realm; and the implementation of appropriate Green Grid projects. All new public realm should be in accordance with Policy GR3 (Public Realm and connecting places).

Likewise, inclusive access to publicly accessible historic buildings and environments will enable residents and visitors to appreciate the Borough's rich heritage irrespective of personal mobility. By placing people at the heart of the design process, and ensuring new development and its wider context are inclusive to all, this will enhance the quality of the place and the spaces within it, ensuring their continued relevance and minimising the need for awkward, often costly and unsightly alterations in the future.

### **Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy GR3 Public Realm and Connecting Places

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter XX:*

### Policy GR3 Public Realm and Connecting Places

- A. New public realm development will be supported where appropriate. It should:
  - a. Respond to the context in which it is proposed to be located within;
  - b. Be designed to achieve the Mayor's Healthy Streets for London indicators to promote non-vehicular travel in a safe, effective, and efficient manner;
  - c. Incorporate careful implementation of electric car charging points, wayfinding signs and infrastructure for cyclists and walking, where these do not add to street clutter. Wayfinding must be done in a consistent manner;
  - d. Demonstrate flexibility to adapt to its locality during both daytime and night-time;
  - e. Provide an appropriate balance of high quality soft and hard landscaping, to enable areas of rest including seating, shade, and shelter;
  - f. Where appropriate, provide for free drinking water and public art; and
  - g. Where appropriate, be adaptable for performance / cultural uses.
- B. Public realm developments will be resisted where they do not comply with the above;
- C. Where development delivers new public realm, or joins existing public realm, it must be designed in accordance with (A.) above, and demonstrate how it could be tied into existing public realm satisfactorily and relate to the new built environment successfully.
- D. Where appropriate, public realm improvement and its future maintenance and management will be secured through the use of Planning Obligations.
- E. The Council will look to produce a masterplan for the Harrow Metropolitan Town Centre. New and enhanced public realm must be delivered where it is consistent with the design principles in the Masterplan.

### Supporting Text:

Public realm constitutes all areas of a development or area that are available for the public to visit, such as a neighbourhood or town centre. The quality of public realm plays a significant role in how people feel about an area, and their willingness to engage with it. It is important that the public realm is designed to be accessible to all within the community, where people are able to feel safe passing through as part of a journey or choosing to rest or dwell.

The design of the public realm cannot be a one size fits all approach, it must provide a high-quality space suitable for the surrounding area and its users. All new or

enhanced public realm should be based on the guidance as set out Historic England's Streets for All – London (2018), and the Mayor's Healthy Streets Approach.

Following this guidance, public realm should ensure that there is not an over reliance on the private motor vehicle. The layout and wayfinding of public spaces should be intuitive and allow people to confidently walk or cycle through the space as part of a wider journey. This approach activates the space, allows for pedestrian priority and positively impacts air quality.

Sustainable infrastructure will be encouraged, facilities such as electric vehicle charging points will be supported where these are located in optimal locations across the borough.

The public realm must be carefully designed to account for different conditions. Specifically, it must be successful during the daytime and also must ensure that during dark hours, the security and safety of users is considered. Appropriate lighting should be provided, whilst ensuring that light and glare does not become a nuisance to nearby residential occupiers or harmful to biodiversity in line with Policy GR7 (External Lighting). Appropriate hard and soft landscaping, and street furniture ensures that areas across the public realm afford opportunities for areas to rest, specifically to provide shade during the heat of the day, or shelter in wetter weather. Landscaping should take the opportunity to install sustainable urban drainage systems to reduce surface water run-off in line with Policy CN4 (Sustainable Drainage).

Where appropriate, free potable water should be made available to reduce single use plastic.

Groups of people congregating can lead to health, safety, and antisocial behaviour concerns. To mitigate this, new public realm should be designed in a manner that allows safe access and exit for a high volume of people across a short period of time. Applicants should utilise the Secured by Design Resilient Design Tool.

Where development does not enhance the public realm (due to site constraints), a financial contribution to enhancing the nearby public realm may be sought.

A Harrow Town Centre Masterplan is proposed to guide development across the Metropolitan Centre, setting out the Council's vision for this area and giving confidence to residents and developers as to what the expectations for development are. New development within this area must follow the guidance set out in the Masterplan. Whilst the Harrow Town Centre Master Plan provides detailed guidance for the area, the policies within the local plan and wider development plan will take precedence.

### **Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy GR4 Building heights

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter XX:*

### Policy GR4 Building heights

- A. Tall buildings are directed to designated tall building zones within the Harrow & Wealdstone Opportunity Area. Within the Opportunity Area, a tall building is any building that is 7 storeys or 21m from the ground level to the highest point of the building (excluding necessary plant and roof infrastructure).
- B. Proposals shall not exceed the maximum appropriate heights as set out within the designated tall buildings zones shown within the Policies Maps.
- C. The Council will seek to restrict proposals for tall buildings outside the identified tall building zones.
- D. Outside of the Harrow & Wealdstone Opportunity Area, there are no designated tall building zones. A tall building is any building that is 7 storeys or 21m from the ground level to the highest point of the building.

#### Design Considerations

- E. Developments must demonstrate compliance with the design criteria in relation to visual, functional, environmental and cumulative impacts as set out in Policy D9C (Tall buildings) of the London Plan (2021), and shall also address how the proposal:
  - a. Would be appropriate for both the application site and the wider context, especially where a proposal may impact areas of significantly lower density and height.
  - b. The protection and preservation of local heritage views, vistas and landmarks, having regard to Policy GR4 (Views Management), and RAF Northolt Safeguarding Zones (set out on Policies Maps); and
  - c. Address matters in relation to the safety of occupiers and any mitigation required.
- F. Proposals that do not meet the definition of a tall building in height are not automatically considered acceptable, and compliance with the remainder of the development plan is required.

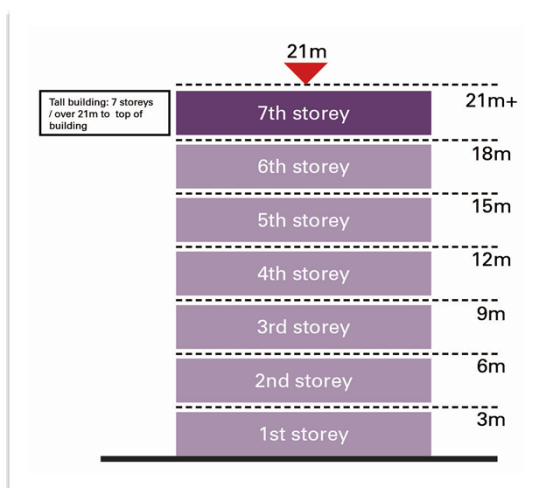
### Supporting Text:

Land is a finite resource and therefore it is paramount to ensure its use is as efficient as possible. Tall buildings provide the opportunity to make efficient use of land, and

deliver against the requirements for a growing population, in terms of new homes, places to work and places for leisure and community. However, it is recognised that tall buildings can be divisive by their very nature, and can significantly impact an area and the people who visit, live and work in them. The London Plan (2021) through Policy D9 (Tall buildings) requires boroughs to identify locations that are appropriate for tall buildings, and to outline what would constitute maximum appropriate heights within those designated zones. These should be delineated on planning policy maps.

The Harrow Characterisation & Tall Building Study (2021) informs the Harrow Local Plan, by providing a detailed contextual analysis of the character of the borough. This has been supplemented by a Tall Building Study (2024) for the Harrow & Wealdstone Opportunity Area, which is the most sustainable location within the borough, and the location able to accommodate the most growth and change. By applying a suitability and sensitivity sifting process, the Tall Building Study (2024) has identified zones within the Harrow & Wealdstone Opportunity Area where tall buildings may be appropriate, and what maximum appropriate heights would be within these zones. Within designated zones, care must be taken to arrange elements of height appropriately, as not all parts of a designated zone will be appropriate for height. Where a new development does not meet the height threshold of a tall building as set out within this policy, this does not automatically make it acceptable. All new development must be considered against the relevant policies of the development plan.

Across the Harrow & Wealdstone Opportunity Area / Borough, a tall building is one that is equal to or greater than 7 storeys and 21 meters from the ground level to the top of the building. Necessary paraphernalia such as plant and machinery typically located on the roof of a building is not included as part of this definition. The provision of such rooftop paraphernalia will be assessed within the context of relevant criteria within this policy and relevant polices within the development plan.



The Tall Building Study (2024) has undertaken a suitability and sensitivity analysis across the Harrow & Wealdstone Opportunity Area, which has enabled designated tall buildings zones to be identified, along with maximum appropriate building heights. These are set out on the Policies Maps. Whilst a maximum appropriate height has been identified within designated buildings zones, this does not mean that the entire or all parts of the designated area are appropriate for buildings of this height. Proposals for tall buildings within designated areas will need to demonstrate how they are

appropriate to both the site and the wider context. Whilst the Harrow & Wealdstone Opportunity Area is an area capable of accommodating tall buildings (within the designated tall building zones), it is adjacent to low-rise suburban areas and this proximity is often abrupt. By reason of this, care needs to be taken to ensure that even within designated tall building zones, stitching into the wider and often much less dense / tall character areas must be satisfactorily demonstrated.

Within the remainder of the Harrow & Wealdstone Opportunity Area that is not designated as a tall building zone, there is no presumption in favour of tall building development, by reason of the more sensitivities within these areas.

Outside of the Harrow & Wealdstone Opportunity Area, Harrow as a borough is comprised largely of a suburban character, which consists of generally two-storey residential buildings. Interspersed are predominantly local or district centres, which are also characterised with modest heights. The Harrow Characterisation & Tall Building Study 2021) clearly sets out that much of the character is comprised of residential areas of two storeys in height, and identifies that buildings that would meet the tall building thresholds as set out in the London Plan are unlikely to be acceptable across much of suburban Harrow.

Notwithstanding this, developments that propose further height within suburban Harrow, but is less than the London Plan definition, can still cause harm to the character of the suburban context. Development within the suburban context of Harrow should refer to the Tall Buildings ('Building Heights') Supplementary Planning Document (2023). This does not provide an alternative tall building definition, rather it seeks to provide guidance for applicants to understand what a contextually tall building across different parts of suburban Harrow would be.

### **Tall Building Design Considerations**

All new development that meets the tall building threshold within this policy, must be of an exemplary design. Proposals should address all parts of Policy D9 of the London Plan (2021), specifically the design considerations set out under Policy D9C.

Proposals should refer to the current evidence base suitability / sensitivity criteria to assist in developing tall buildings, and to determine their successful arrangement across a site. When considering the height of buildings within a development, it is assumed that the floor to ceiling height is 3.0m from floor to ceiling.

Whilst from a townscape perspective, areas have been identified as appropriate for tall buildings, new development must consider all relevant policies and constraints for a site and beyond. Particular to LB Harrow, constraints such as protected viewing corridors such as to St Mary's Church may impact on the height arrangement across a site. Policy GR5 (View Management) provides further detail and protected viewing corridors are published on the planning policies map.

Located to the west of LB Harrow is RAF Northolt, whose operations rely on aircraft flying over Harrow Town Centre. As part of operations, safeguarding zones cover the borough and provide a threshold or circumstances as to when consult with the Ministry of Defence (statutory consultee). The safeguarding thresholds are available on the Council's website.

Tall buildings by their very nature can result in a density of living that can mean that a significant number of people occupy a single building. Means of escape from events

such as fire must be factored into the early design stages of development, to ensure the protection of human life, a fundamental design and duty of care consideration. In addressing means of escape for fire, this must include two staircases and be of a capacity to ensure or users, including maximum occupiers at anyone time of a communal area, are able to evacuate in a safe manner. A fire safety assessment must support any tall building application. This will be assessed by an independent / suitably qualified fire assessor at the applicants' expense.

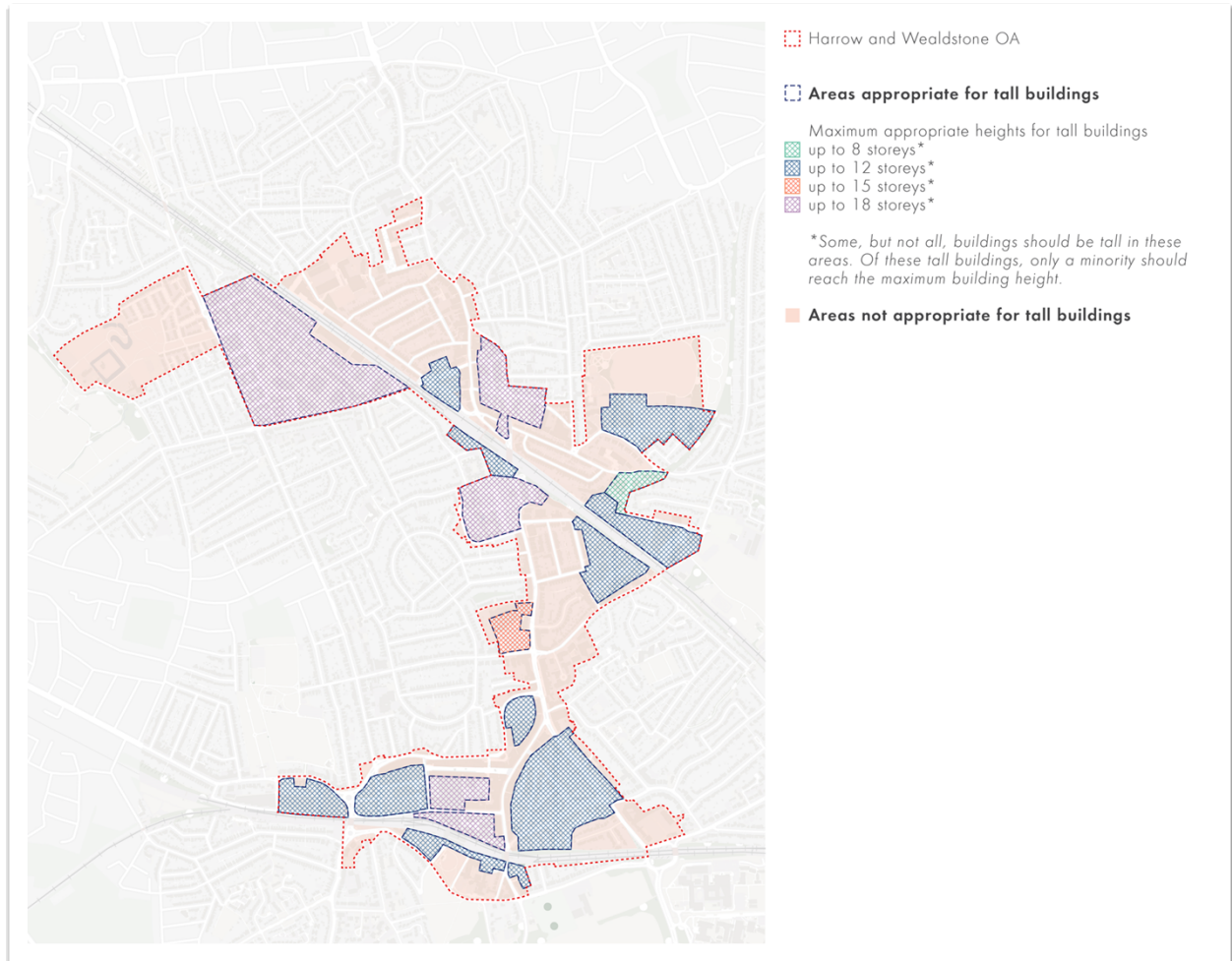
New development that proposes tall buildings as set out within this policy, are expected to progress through a relevant Design Review Panel, managed by the Local Planning Authority. This should be undertaken to assist in pre-application discussions and to gain independent, expert insight and engagement. Applicants are strongly advised to take advantage of this paid-for service to ensure robust design scrutiny of a new development is undertaken, which will assist in ensuring a high-quality development is delivered.

The Council uses the digital 3D modelling platform VU.CITY in the planning process for assessing the design of major applications, including tall building proposals. In preparing an application for a tall building(s), the use of digital 3D modelling should be utilised. This is an essential step in delivering good growth and high-quality design across the borough and is required for all major applications. Assessing digital models of proposals allows for a better understanding of the impact of new development on the local context. It also helps to assess the massing, scale and design of development and its impacts, both in terms of existing and consented developments.

### **Reasonable Alternative:**

It is considered that there are no reasonable alternatives to this policy. London Plan requires a Local Plan policy and for this to include three elements (definition, locations, appropriate heights), so no policy is not a reasonable alternative as it would not be in general conformity with the London Plan.

The definition, locations and appropriate heights in the draft policy have been informed by the evidence base informing the Local Plan and as the Local Plan needs to be justified (by evidence) in order to be considered 'sound' under the NPPF, alternative definitions / locations / heights are not reasonable.



**Designated Tall Building Zones Map [Provisional]**



## Policy GR5 View Management

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter XX:*

### **Policy GR5 View Management**

- A. The protected views identified in Schedule 3 will be safeguarded in accordance with the Harrow Views Assessment (2012) and Policy HC4 (London Views Management Framework) of the London Plan (2021).
- B. Where there is a protected view:
  - a. Development within a Protected Views Restricted Corridor (shown in red) that exceeds the specified threshold height will be refused.
  - b. Development in the Protected Views Setting Corridor (shown in yellow) should form an attractive element in its own right and preserve or enhance the viewers' ability to recognise and to appreciate the landmark.
- C. Development should not harm and, where possible, should make a positive contribution to the characteristics and composition of the protected views and their landmark elements. It should also preserve or enhance viewers' ability to recognise and to appreciate important landmarks, in particular St. Mary's Church and Harrow on the Hill, and the Harrow Weald Ridge as seen from designated viewing places.
- D. Development in the foreground and middle ground of a protected view should not be overly intrusive or unsightly to the detriment of the view, or detract from the prominence of the landmark.
- E. Development proposals in the background of a view should give context to landmarks and not harm the composition of the view as a whole.
- F. Viewing places should be accessible and managed so that they enhance people's experience of the view.
- G. Opportunities to create new local views and vistas should be exploited through the design and layout of new development.
- H. Developments outside of the Opportunity Area, but within a designated landmark viewing corridor (or wider setting consultation corridor) must take into consideration the guidance in the Harrow Tall Building (Building Heights) Supplementary Planning Document (2023).

**Supporting Text:**

The landscape backdrop provided by the Green Belt, to the north of the Borough, and the profile of Harrow Hill with St. Mary's Church to the south of the Borough, are significant components of local identity and sense of place. The topography of the Borough and the prevailing building heights across Harrow's suburban districts are such that views and glimpses of these features can be enjoyed as part of the experience of moving through, or living within, the Borough. Views towards the Green Belt are a reminder of the proximity of Harrow's suburbs to the countryside, and appreciation of the changing seasons, whilst views towards Harrow on the Hill and St. Mary's Church reinforce the historical and cultural importance of that place.

The Council has commissioned a views assessment to assess the 11 local views and vistas within the Harrow Development Management Policies Local Plan (2013), to consider if over the previous plan period these views continue to be worthy of protection across the new plan period. Findings and outcomes of this evidence base work will be published as part of the Formal Regulation 19 consultation process.

Poorly located and designed buildings, and those of inappropriate height, could significantly detract from these views. However, visibility should not be conflated with harm. A truly outstanding design that is well located and designed to inspire the viewer may enhance a protected views setting corridor. Viewpoints should be maintained, and where possible enhanced. Harrow's attractive skyline ridges and landscape features can be enjoyed from vantage points throughout the Borough. New development may provide opportunities to open up new local views and vistas, or to create new landmarks in the townscape; where such opportunities exist, they should be fully exploited through the design and layout of buildings and spaces.

Proposals that are located within a Protected Views Setting Corridor and breach the height thresholds set out in Schedule 3, must utilise appropriate 3D modelling software to accurately demonstrate how a new development would respond to its immediate context and to its wider character setting. Following preparation of appropriate plans (including 3D modelling), applicants are required to engage with the Harrow Design Review process. Meaningful engagement with this process will assist in ensuring new development achieves exemplary design as required by the policy, and mitigating harm to the assets sought to be protected by the protected viewing corridors.

**Reasonable Alternative:**

This policy has been drafted to be in general conformity with the London Plan. It is considered there are no reasonable alternatives under the London Plan, with respect to the inclusion of a policy and its approach.

The current local plan (Policy DM3: Protected Views & Vistas) sets out 11 protected views across the Borough. The London Plan (2021) requires boroughs to review their protected views, to ensure that they are still worthy of being protected. The Council is in the process of undertaking this work, and any views confirmed worthy of being protected, must be to ensure general conformity with the London Plan (2021). This updated evidence base may result in changes in the views that are protected. Once complete, further consideration will be given as to whether the outcomes of the study mean that there are reasonable alternatives to the preferred policy and continuation of the currently identified 11 protected views.

## Policy GR6 Areas of Special Character

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter XX:*

### Policy GR6 Areas of Special Character

- A. Proposals affecting an area of special character will be assessed regarding:
  - a. The impact of the proposal upon the strategic value of the area of special character;
  - b. The desirability of preserving or enhancing the environmental, architectural, historic and landscape features that contribute to the area of special character; and
  - c. The protected views to and from areas of special character.
- B. Proposals that would realise sustainable opportunities for increased appreciation of, or public access to, areas of special character will be supported.
- C. Proposals that would substantially harm an area of special character, or its setting, will be refused.

### Supporting Text:

Rising above the predominantly two storey, suburban development of the central lowland areas, Harrow's areas of high ground are of strategic importance to the character and distinctiveness of the Borough. Pinner Hill and Harrow Weald Ridge provide an elevated horizon of tree cover and open countryside which spans across the north of the Borough and acts as a visual reminder that Harrow is an outer-London borough, a transition between the highly urbanised characteristics of central & inner London and the more rural character of the counties beyond. Harrow Hill is a topographical feature with an identifiable profile to the south of the Borough, forming the verdant 'shoulders' upon which sits St. Mary's Church and supplemented by a substantial body of open space around the Hill's lower slopes. Harrow Weald Ridge, Pinner Hill and Harrow on the Hill contain a significant number of the Borough's heritage assets. Harrow on the Hill is also of cultural importance as the Borough's principal historic settlement and as the location of Harrow School.

Reflecting the strategic importance of these parts of the Borough, the Local Plan retains their designation as areas of special character and undertakes to manage development to maintain their special character. The extent of the areas of special character is delineated on the Harrow adopted Policies Map.

The strategic value of the Harrow Weald Ridge and Pinner Hill area of special character is as a significant landscape backdrop that comprises extensive tree cover, including the cumulative contribution of small groups and individual trees, and major open areas.

The strategic value of the Harrow on the Hill area of special character is the prominence that the Hill provides to the historic hilltop settlement, particularly St.

Mary's Church and historic Harrow School buildings, and the setting created by the major open areas, including the cumulative contribution of groups and individual trees. The boundaries of the Harrow on the Hill area of special character take in playing fields and other spaces which form Metropolitan Open Land around the hilltop settlement.

As described above, parts of Harrow Weald Ridge, Pinner Hill and Harrow on the Hill provide substantial tree cover and extensive tracts of open and natural land. These areas make a positive contribution to the borough through their relatively low light, air and noise pollution, as well as places for undisturbed habitat formation and wildlife movement.

Heritage assets feature in each of the areas of special character. The townscape of Harrow on the Hill is a crucial component of its heritage as the principal, historic settlement in the modern Borough. At Pinner Hill and Harrow Weald Ridge historic farm complexes, cottages, villas and lodges, among other heritage assets, are valuable components of the areas' countryside and rural character.

The value of protecting the Borough's areas of special character, and their features, is diminished if they cannot be seen and appreciated from within the urban and suburban environment.

There are already many opportunities for residents and visitors to access and enjoy areas of special character. The London Loop strategic walking route passes through Pinner Hill and Harrow Weald Ridge, whilst the Capital Ring is routed through Harrow on the Hill. Bentley Priory Open Space, Stanmore Country Park and Stanmore Common all provide opportunities for the appreciation of the natural environment in Harrow Weald. The extension to Stanmore Country Park, known as Wood Farm, has been delivered over the previous plan period. This asset both increases public access to land within the Harrow Weald area of special character and provides a new, public viewpoint towards Harrow on the Hill and central London.

Policy HE1 (Heritage Assets) includes requirements relating to Local Areas of Special Character. These are distinct from Areas of Special Character by virtue of their scale and character. Areas of Special Character reflect the overall structure of the borough with respect to the distinction between suburban / urban built up areas and the elevated, more rural and / or historic landscapes and the views they offer to and from them. Local Areas of Special Character on the other hand are more modest in scale, being areas of heritage, architectural, townscape and landscape value at a local, more internalised level.

#### **Reasonable Alternative:**

**No Policy Option:** The draft policy seeks to protect the contribution that the elevated parts of the borough make to the distinctive local character of the borough. There is however no formal obligation under the NPPF nor the London Plan to include such a policy nor designate such areas on the Policies Map. It would therefore be a reasonable alternative not to include a policy / designation. Such an alternative would however impact on the Council's ability to set out expectations for development and protect the areas that have been identified within the borough as having special character, and by reason of their elevated nature, harm by new development is likely to be exacerbated over a wider area. Such an option is therefore not the Council's preferred option.

## Policy GR7 External Lighting

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter XX:*

### Policy GR7 External Lighting

- A. New development should incorporate appropriate external lighting and be designed to mitigate wider harm. Lighting should be:
  - a. Appropriate for its purpose and its setting;
  - b. demonstrated to minimise the level of illumination required, glare, angle and light trespass, particularly to mitigate any harm to sensitive receptors such as residential properties, natural habitats and biodiversity; and
  - c. Assists in achieving a high standard of secure by design.
  
- B. Proposals for floodlighting will be supported where it would enhance sport facilities and would not be detrimental to the character of the open land, the amenity of neighbouring occupiers nor harmful to biodiversity.

### Supporting Text:

External lighting can be an important element of new development, depending on its scale and purpose. However, poorly thought out, designed and managed external lighting can result in light nuisance. A lighting strategy for new development should be prepared, which details the requirements of the proposed use and any impacts on the wider area. External lighting that utilises illumination that is significantly brighter than need be for its use, in conjunction with height and angle can lead to light trespass and nuisance to adjoining properties. Specifically, sensitive receiving environments such as residential properties can have their amenity harmed by light trespass due to insufficient cowling or poor angling of lights.

Biodiversity and natural habitats can often be sensitive to external lighting where it is poorly designed, in terms of its illumination, siting and angle of lighting. New development must consider any impacts on existing biodiversity within the site, and specifically to lighting, biodiversity that is located adjacent and nearby to the site.

The council will consider the use of appropriate conditions post permission to restrict additional lighting to developments, where this is considered appropriate and necessary to protect amenity and biodiversity.

External lighting plays a crucial role in ensuring Secure by Design for new developments, specifically where large-scale developments are delivered with larger areas of public realm. Appropriate levels of external lighting, in conjunction with high quality design, assist in ensuring that people feel safe. Appropriate lighting strategies will ensure that developments are satisfactorily lit to provide clear lines of sight and that there are no darkened locations which may give rise to safety concerns.

Policy S5 Sports and recreation facilities of the London Plan provides support for floodlighting within reasonable hours, where there is an identified need for sport facilities, and lighting is required to increase their potential usage, unless it would give rise to demonstrable harm to the local community or biodiversity. Proposals within or close proximity to Green Belt, Metropolitan Open Land, and Open space must consider these as areas of less light source, and that proposals would not harm this context or areas of biodiversity interest.

In determining the appropriateness of external lighting, the Council's Environmental Health Department will appraise lighting strategies submitted with planning applications to determine their appropriateness. Applicants should refer to the Institution of Lighting Professionals; Guidance Note 01/21 (The Reduction of Obtrusive Light) or any subsequent iteration.

**Reasonable Alternative:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy GR8 Shopfronts & Forecourts

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter XX:*

### Policy GR8 Shopfronts & Forecourts

- A. Proposals for shopfronts including blinds, canopies, front extensions and development on forecourts will be supported where:
- a. They provide an active frontage and are of a scale and proportion appropriate to the host building, architectural character and the wider character of the area in which it is located;
  - b. They do not obstruct or adversely affect pedestrian or highway safety, particularly for users with visual impairment or impaired mobility;
  - c. They would preserve or enhance heritage assets;
  - d. The shopfront would provide all-abilities inclusive access;
  - e. The illumination of shopfronts and forecourts would not detrimentally affect the amenity of neighbouring occupiers, or the character or appearance of a conservation area;
  - f. The proposal involves the installation of a new or replacement shopfront, the use of toughened glass will be required; and
  - g. Awnings or canopies are retractable and fold away discreetly when not required outside of operational hours.
- B. Where security shutters are proposed they should be of an open mesh design and, wherever possible, should be located internally.
- C. Tables, chairs and other ancillary paraphernalia on forecourts will be considered on a case-by-case basis and must:
- a. Ensure the frontage does not appear cluttered within the streetscene;
  - b. Ensure the pedestrian thoroughfare is not obstructed, allowing for the free flow of pedestrians, including those with disabilities.
  - c. Ensure that highway safety is not compromised; and
  - d. Only be used during hours that are appropriate for the centre within which they are located.

### Supporting Text:

For many pedestrians and shoppers, the ground floor frontages of buildings provide the principal perception of the quality of the built environment in town centres and neighbourhood parades. Well designed, practical shopfronts can make a positive contribution to the townscape and success of the Borough's shopping areas.

Both individually and cumulatively, minor development such as shopfronts, security shutters and canopies can influence perceptions of the accessibility and security of an

area and visually impact the street scene. A proliferation of solid security shutters create a fortress-like atmosphere in town centres and neighbourhood parades when premises are closed, perpetuating fear of crime and personal safety. Shutters with a transparent 'open mesh' design help to maintain visual interest and, along with a mix of appropriate town centre uses, help to enliven town centres during the evening.

Outdoor dining provides an opportunity for small businesses to increase their turnover and assists in enlivening a streetscene whether in a town centre or a small parade.

The installation of new shopfronts, including those that replace existing shopfronts, provides the opportunity not only to improve the appearance of the streetscene but to design-in safety and security features including toughened glass in preference to shutters to improve the safety and security of ground floor units.

**Reasonable Alternative:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.



## Policy GR9 Outdoor Advertisements, digital displays and hoardings

*Linkages:*

*NPPF Chapter:*

*London Plan Chapter:*

### **Policy GR9 Outdoor Advertisements, digital displays and hoardings**

- A. Proposals for advertisements on buildings and freestanding units will be supported where:
- a. They do not adversely affect the visual amenity of the area;
  - b. They do not adversely affect the amenity of residential occupiers by reason of siting, illumination or noise;
  - c. They are appropriate in scale and illumination to the location and, in the case of advertisements on buildings, the host building;
  - d. They contribute to rationalising street clutter and help to achieve an inclusive, legible environment;
  - e. They contribute to the safety of the environment for pedestrians, cyclists and drivers;
  - f. They do not impede any existing or proposed surveillance equipment, and contribute positively to public perceptions of security;
  - g. They do not adversely affect the amenity of any residential or sensitive area;
  - h. Advertisements associated with Wifi or telecommunication infrastructure must be proportionate to the overall structure, and must not lead to an over proliferation within the locality;
  - i. Advertisements associated with electric car charging stations must be proportionate to the to the overall structure, and should only relate to the charging station service provider. Where advertisements vary from the service provider, proposals must comply with a - g above.
- B. Advertisement hoardings will be appropriate in non-residential areas where they screen vacant or derelict sites, or sites where development is imminent.
- C. Proposals for advertisement resulting in a cluster of hoardings will be resisted where there would be a cumulative impact upon amenity.
- D. Proposals for advertisements that advertise temporary events and markets in centres will be supported.

### **Supporting Text:**

Well designed and considerately located, commercial advertisements add to the interest and vibrancy of town centres and other commercial areas. Advertisements

can also be used to identify uses and occupiers within a building or area and can contribute positively to the legibility of the urban environment. However, over-sized, insensitively sited and inappropriately illuminated advertisements can be unsightly, detract from the character of an area and run counter to the creation of safe, accessible environments. Applicants should consider guidance set out by the Advertising Standards Authority in the context of the imagery or text that they wish to advertise.

Advertisements within residential areas or at the interface of commercial and residential areas can adversely affect the amenity of the residential area. Advertisements which are illuminated or emit noise, such as those which provide a moving display, have considerable potential to cause nuisance to residential occupiers. In the more commercial context of town centres, illuminated and moving display units are to be expected, but can nevertheless adversely impact residential premises above ground level.

Freestanding advertisements frequently add to street clutter and obstructions in the public realm. The Council's preference is for such advertisements to be integrated with the provision of required street furniture, like bus stops or telephone boxes. Free standing Wifi and USB charging docking may be located in town centres and parades. These developments often appear secondary to the internally illuminated advertisement component associated with them, and can appear as incongruous additions to the locality. Care must be taken to ensure an appropriate balance between the primary infrastructure and the ancillary advertisement element. Furthermore, there should not be an over proliferation of such developments, specifically in the context of all other street furniture, which can lead to excessive street clutter.

Electric vehicle charging stations are becoming more frequent in the public realm. Care must be taken to ensure that the opportunity to use individual charging stations to host advertisements, does not lead to an over proliferation of advertising. Proposals for advertisements should be proportionate to the charging station and advertise the service provider only.

Areas that are sensitive to advertisements include the Green Belt, Metropolitan Open Land, other open space, Areas of Special Character, conservation areas, and local areas of special character. Listed buildings (including locally listed buildings) are also sensitive to advertisements, and the act of fixing the advertisement may require listed building consent.

Occasional street markets and other temporary events help to enliven and support the Borough's town centres. By their nature, such activities require local advertising to raise awareness of the time, location and nature of the market or event, and therefore to ensure that they are successful. Certain forms of advertising for temporary events benefit from 'deemed consent' as defined in the Town and Country Planning (Control of Advertisements) (England) Regulations (2007) and do not, therefore, require an application for advertisement consent.

### **Reasonable Alternative:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy GR10 Infill and backland sites, back gardens and amenity areas

*Linkages:*

*NPPF Chapter:*

*London Plan Chapter:*

### **Policy GR10 Infill and backland sites, back gardens and amenity areas**

#### *General*

- A. Proposals on Infill, backland sites, [non-designated] open space, garden land and garage sites will only be acceptable where;
- a. The proposal would be a high-quality design of a scale and intensity appropriate within the context it is located in;
  - b. Proposals assist in the delivery of homes as demonstrably needed [Strategic Housing Policy 03].
  - c. Neighbouring amenity is protected in terms of access to daylight, sunlight and actual or perceived privacy, in accordance with Policy GR1
  - d. Ensure a satisfactory quantum and quality of landscaping to provide for amenity space and biodiversity enhancements.
  - e. Appropriate levels of car parking is provided commensurate to the scale of development, with servicing and refuse collection adequately addressed.
  - f. The proposal is accessible to all; and
  - g. Addresses any relevant supplementary guidance.

#### *Infill Sites*

- B. Proposals for gap sites located in an established street scene will be supported where they:
- a. Demonstrate compliance with A (a-g) above;
  - b. Ensure sufficient private garden / amenity space is provided for both the proposal site and any donor property; and
  - c. Satisfactory servicing, waste and cycle storage is provided.

#### *Backland Development*

- C. Proposals that are located on backland sites will be supported where they;
- a. Demonstrate compliance with A (a-g) above;
  - b. Provide satisfactory access to the development;
  - c. Ensure appropriate waste servicing can be provided; and
  - d. Ensure secure by design measures have been addressed.

#### *Non-designated open space*

- D. Proposals for new housing on non-designated open space will be supported where they;

- a. Demonstrate compliance with A (a-g) above;
- b. Ensure highway safety is maintained; and
- c. Address any relevant supplementary guidance.

#### *Garden land*

- E. Proposals for new housing on rear gardens will be resisted unless they;
  - a. Demonstrate compliance with A (a-g) above; and
  - b. Form part of the comprehensive development of a number of plots.

E.1 Housing on individual rear gardens will not be supported.

#### *Garage sites*

- F. Proposals that seek to redevelop garage sites within a development will be supported where they:
  - a. Demonstrate compliance with A (a-g) above; and
  - b. Satisfactorily demonstrate the loss of garages will not cause or exacerbate parking pressure within the surrounding network.

### **Supporting Text:**

Across outer London there are numerous opportunities to deliver appropriate small site housing developments, which are able to contribute to delivering housing needs for the borough. Development opportunities can exist on sites that constitute infill, back land sites, [non-designated] open space, garden land and garage sites. Much of the suburban area in Harrow is made up of 2-storey residential homes with rear gardens that provide amenity space for residents and biodiversity habitat.

Residential gardens are a strong element of suburban character and are an important component of the quality of life enjoyed by many Harrow residents. Development in these areas requires careful management to ensure this character is respected. However, character across the borough will continue to evolve over time, which will include the gentle densification of suburbia. Furthermore, the borough will continue to face pressure to deliver against its housing target set for it in the London Plan, but also to deliver the right type of homes that Harrow residents need.

The National Planning Policy Framework (2021) (paragraph 69) states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and such developments are able to often be built-out relatively quickly. The London Plan (2021) Policy H2 (Small sites) sets out that boroughs should recognise that character evolves over time, and that small sites can provide a valuable contribution to meeting housing targets. A small site housing target of 375 homes per year has been set for Harrow, which forms a component of the over 802 homes per year.

The Council will seek to encourage appropriate opportunities to achieve the requirements as set out in Policy H2 (Small sites) of the London Plan (2021) which encourages development in locations well serviced by public transport and amenities.

Small sites development must comply with policy H03 (Optimising the use of small housing sites) of the Local Plan.

Small site development outside of the sustainable areas identified in policy HO3, will be less acceptable.

The prevalence of detached, semi-detached and terrace style housing provides a character of family homes across the borough from both a visual and use perspective. This character must be considered in any development application. Local Plan Policy GR1 (Delivering high quality design in Harrow) must also be addressed as any new development.

Infill, back land sites, [non-designated] open space, garden land and garage sites are often constrained sites and in close proximity to existing residential properties. Proposals must be creatively designed to ensure that whilst new development respects the character of a location's context, is also ensures that window placements protect the amenity of existing and future occupiers. New development should also ensure that new homes and their respective amenity outdoor amenity space is accessible for a range of users. Amenity space must be useable and functionable appropriate for future occupiers.

Local Plan Policy GR1 (Delivering high quality design in Harrow) must also be addressed as any new development.

Infill sites are often represented by a gap within a strong pattern of development, where housing fronting a road appears very uniform. However, within a uniform street scene, vacant sites within the row can appear as an anomaly. These gap sites may occur where houses were never built, or the street was impacted by historical bomb damage. Other gaps may arise from irregular plot shapes or very large gardens. These sites represent an opportunity to infill a logical gap within the streetscene.

Backland sites are generally vacant plots of land that are located between rear property boundaries or properties facing away from each other onto opposing street frontages. These sites are often accessed through a single access lane running down the flank elevation of two properties facing onto a street, which can cause access issues for construction, servicing and private vehicles. Applications must set out how access and servicing will be undertaken in a satisfactory manner, ensuring secure by design and pedestrian accessibility is also safeguarded.

Residential properties with individual rear gardens are a predominant characteristic, where any built development is of a single storey and ancillary in use to the main residential dwelling on the site. Individually, new development that exceeds this height and / or is independent use of the principal residential use of the site, has a detrimental impact on the use of the property and the character of the area. The Council discourages ad hoc planning applications to individual rear gardens, which can lead to incremental erosion of suburban character.

Where site assembly has been secured and a number of rear gardens propose a comprehensive development, subject to compliance with the Small Sites Design Code SPD and this policy, they may be supported. What constitutes a comprehensive development in terms of the number of sites, will be determined on a case-by-case basis. This will be assessed by the scale of development (number of units) and the

overall site size, as this will determine the impact that a development is likely to have on the wider area and the planning benefits it would have.

Numerous housing estates and flatted departments have communal garages within their wider site. These sites are often dated with garage sites no longer fit for purpose. In many circumstances, garages are now used for general storage for the residential properties. Applications for demolition of garage sites and new residential development must satisfactorily demonstrate that the garages are not in use as car parking spaces, and that their loss would not exacerbate parking pressures in the area. Numerous garage sites within housing starts, are often set within designated open space, for which there is presumption against any net loss. New development within housing estates where the open space is designated, should also refer to Local Plan Policy HO5 (Housing estate maintenance, renewal and regeneration).

Non-designated sites are often publicly accessible, and form what appears to be a left-over piece of land at the end of a row of houses, which was never initially built on as part of a development. Such sites are not prevalent across Harrow, but often appear between the end of row and the back kerb of a highway. New development in close proximity to the highway, must demonstrate that highway safety is maintained in terms of access to and from the highway and appropriate site lines are maintained.

### **Proposed glossary of development typologies.**

<b>Site Typology</b>	<b>Definition</b>
Infill	Derelict sites or unattended sites. The scale of these sites tends to align with the urban grain and surrounding developments. Many of these sites are situated in residential suburban streets.
Backland	Vacant open sites that are located in suburban areas behind regularly arranged residential properties
Garden land	Garden land means any land within the curtilage of a building the principal use of which is residential, in particular to the rear of the site.
Garage	Buildings with a narrow massing which are designed to house vehicles. Typically, these garages are located in residential areas and estates. Many of these garages include hardstanding for turning vehicles.
Non-designated open space	Open tracts of land which are located within residential areas (particularly in estates). Many open spaces consist of grass fields

### **Reasonable Alternative:**

**No Policy Option:** This would impact on the Council's ability to set out expectations for development and protect the character and amenity of the Borough, particularly in the predominately suburban areas that are a key characteristic of the borough. Consequently, this alternative is not the Council's preferred option.

**More permissive policy:** The Strategic Housing Policy 03 identifies the amount of housing required, and where this is being strategically directed to, which is within the Harrow & Wealdstone Opportunity Area (a minimum of 7,500 dwellings). By

strategically directing growth to the most sustainable location within the borough, there would be less requirement to deliver housing within suburban Harrow which would contribute to retaining its low-density, suburban character. A reasonable alternative would however be to include a more permissive policy. This however is not the Council's preferred option as such a policy could result in an inconsistency with overarching approach to direct growth to the most sustainable location within the borough (the Opportunity Area), and area capable to accommodate the most change in the borough having regard to matters such as prevailing character and building heights, and site availability). Furthermore, a more permissive policy may result in a level of change that the suburban areas of Harrow are not able to comfortably adapt to a significant amount of change that an overly permissive policy may result in.

## Policy GR11 Planning Obligations

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter XX:*

### **Policy GR11 Planning Obligations**

- A. Planning obligations will be sought on a scheme-by-scheme basis to secure the provision of affordable housing in relation to residential development schemes, and to ensure that all relevant development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.
- B. Applications that fail to secure an appropriate Planning Obligation to make the proposal acceptable will be refused.

### **Supporting Text:**

The Harrow Community Infrastructure Levy (CIL) will ensure that new development helps to fund the cost of new or enhanced strategic infrastructure to support the cumulative impacts of development across the borough. The list of the types of infrastructure to be funded by CIL is set out in the annual infrastructure funding statement available on the Council's website, such as schools, libraries and healthcare.

A proportion of total Harrow CIL receipts is allocated to fund projects that reflect the priorities within the area in which Harrow CIL was received ('Neighbourhood CIL'). The Council will work with relevant stakeholders to identify local priorities for the spending of NCIL.

The Council has produced an Infrastructure Delivery Plan as part of the Local Plan review, and this evolving document will form the basis for infrastructure and funding priorities across the plan period (2021 to 2041).

Where new development requires a bespoke mitigation to make a scheme acceptable in planning terms, the Council may enter into a legal agreement with a developer. A legal agreement would take the form of a S.106 agreement, where an obligation will be secured on a specific matter. However, the nature of site-specific impacts means they vary widely depending on the site, its local context, and the development proposed. Therefore, beyond the requirements for affordable housing, it is not possible to ascribe a set of circumstances under which certain types of obligations will be sought as a norm. Obligations can take the form of monetary contributions or non-monetary contributions (such as those relating to employment and training provision, travel plans, design quality, biodiversity net gain monitoring etc).

The Council will produce guidance to set out how any monetary obligations would be calculated and the form of non-monetary obligations, which will be published on the Council website. This will be updated on a regular basis to reflect up to date charging



appropriate for each monetary contribution type. Consistent with the NPPF, the cumulative impact of planning obligations will be set at a level that does not render development unviable within the borough.

All new development must consider the obligations as set out in the local plan, including relevant policies, CIL and S.106 obligations when developing a scheme. Any financial contributions must be considered at an early stage by developers, and form part of a scheme viability consideration, including the price paid for land.

**Reasonable Alternative:**

This policy has been drafted to be consistent with relevant legislation, national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national legislation, national policy or the London Plan.

# **Chapter 03: Heritage**

## Strategic Policy 02: Harrow Heritage Assets

*Linkages:*

*NPPF Chapter 16: Conserving and enhancing the historic environment*

*London Plan Chapter 3: Design*

*London Plan Chapter 7: Heritage and Culture*

### **Strategic Policy 02: Harrow Heritage Assets**

A. The Council will manage heritage assets to ensure that development proposals preserve or enhance the significance of heritage assets (both designated or non-designated) and other historic environment assets. The Council will ensure that its heritage assets play a role in place making by;

- a. Determining applications in accordance with the National Planning Policy Framework the London Plan, and Local Plan policies HE1 (Heritage Assets) and HE2 (Enabling Development) where proposals affect heritage assets.
- b. Promoting the significance of the main heritage assets within the borough which provide important wider social, cultural economic and environmental benefits, including assets such as the international value of Harrow School, and other assets such as Headstone Manor, St Mary's Church, and conservation areas.
- c. Where necessary, support restoration schemes and changes of use where they comply with A above, and secure the long-term future of the asset whilst providing an appropriate use and scale of development for the asset and its setting. The Council will work with Historic England and relevant stakeholders to include any assets on the at Risk Register where appropriate.
- d. Continuing to review undesignated heritage assets for potential formal designation e.g., as listed buildings, conservation areas, historic parks and gardens, and local areas of special character.
- e. Ensuring that new development within the local strategic views (as set out within the policies map) do not harm views to St Mary's Church spire on Harrow on the Hill and other identified assets.
- f. Supporting developments that improve access to, and the appreciation of, a heritage asset;

B. Where evidenced, neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision

C. Support measures to heritage assets to mitigate and adapt to climate change where appropriate, where these are able to be undertaken sensitively, whilst not harming the significance of the heritage asset.

### **Supporting Text:**

Harrow's built heritage is principally found in clusters around its medieval town centres and historic landscapes. Early settlements such as Edgware, Pinner, Stanmore and Harrow on the Hill are protected by Conservation Areas and with many Statutory Listed Buildings, forming networks of assets along on key routes into and out of central

London. Landscape is intrinsic to Harrow's strategic character with protected views to and from St Mary's Church in the south and Harrow Weald in the north. It is also important at the local scale, with the mature landscape of woodland and vegetation shaping a strong sense of place in Hatch End, Clamp Hill and Bentley. 20th century Modernist and Art Deco assets also preserve and enhance local character, often acting as a counterpoint to the typical Metroland vernacular. These are typically civic and leisure uses such as London Underground stations, libraries and cinemas that are nestled into neighbourhoods.

Harrow's identified heritage assets and historic environment will continue to be valued, conserved and enhanced.

New development should consider the unique heritage assets within the London Borough of Harrow, and where appropriate, draw on the contribution of such assets to inform the character of a place and new development within it.

The National Planning Policy Framework and the London Plan (2021) both provide further policy and guidance on heritage assets and the important contribution they make to place and people. Planning applications that have an impact on heritage assets (including designated, non-designated, and archaeological sites) must demonstrate compliance with wider development plan policies.

The Council will support the restoration of heritage assets to ensure a viable use and the securement of the long-term future of the asset. This must be to a use and scale of intensity that is appropriate for the property, and any proposal must also demonstrate.

Heritage assets that fall into disrepair through lack of maintenance can lead to significant degradation of an asset. Where appropriate, the Council will work with partners to list these on the Heritage at Risk Register. Similarly, where appropriate and in the public interest, the Council will pursue enforcement action in relation to the condition of heritage assets. However, the Council will also work to bring these assets back into a viable use, restoring the significance of the asset.

All new development should seek to address climate change. Applications that propose climate change mitigation measures (such as renewable energy technology), should seek to ensure the significance of the asset is preserved. Applications for climate change mitigation measures must provide detailed analysis of the significance of the heritage asset to provide a clear understanding of the significance and any potential harm, an assessment of the proposed measures on the significance of the asset (and any options to mitigate any harm) and what level of efficiency improvements, renewable energy provision or climate adaptation would be delivered.

Enabling development provides an opportunity for alternative uses to be introduced to a site, which may enable a heritage asset to be restored. The Council will support enabling development schemes where the bare minimum of enabling development is delivered to secure the long-term future of the heritage asset and the significance of the heritage asset would be preserved. Developments seeking to progress an enabling development scheme, must also take into consideration national policy and advice set out by Historic England.

**Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy HE1: Heritage Assets

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter XX:*

### **Policy HE1: Heritage Assets**

- A Proposals that secure the preservation, conservation or enhancement of a heritage asset and its setting, or which secure opportunities for sustainable enjoyment of the historic environment, will be supported.
- B Proposals should describe the significance of any heritage assets affected by development including any contribution made by the setting. The impact of proposals on heritage assets will be assessed having regard to:
  - a. Emerging or adopted supplementary planning documents, including character appraisals, management plans or other relevant documents;
  - b. Consideration of design, appearance and character including proportion, scale, height, massing, bulk, alignment, materials, historic fabric, use, features, location, relationship with adjacent assets, setting, layout, plan form and landscaping;
  - c. The proposals ability to conserve and sustain heritage assets, and their setting;
  - d. Sustainable economic benefits;
  - e. Climate change mitigation; and
  - f. The desirability of increasing understanding and interpretation of heritage assets; and
  - g. The ability to reverse any change.
- C The Council will use planning conditions and planning obligations where necessary to secure the exploitation of opportunities for sustainable public access to the historic environment.

### **Conservation Areas**

- D. In addition to (A) and (B) above, when considering proposals within conservation areas, the Council will:
  - a. Support the redevelopment of sites that detract from the character or appearance of the conservation area; and
  - b. Exploit opportunities to restore lost features or introduce new ones that would enhance the character and appearance of the conservation area.

### **Listed Buildings (including Locally Listed Buildings)**

- E. In addition to (A) and (B) above, when considering proposals affecting listed buildings and their setting, the Council will:
  - a. Pay special attention to the building's character and any features of special architectural or historic interest which it possesses, and the role of the building's setting in these regards; and
  - b. Exploit all opportunities to secure the future of listed buildings particularly those on the 'heritage at risk' register.

### **Scheduled Ancient Monuments**

- F. In addition to (A) and (B) above, when considering proposals affecting scheduled ancient monuments, the Council will have regard to:
- a. The relationship of the monument with other archaeology and the wider landscape in which it should be interpreted;
  - b. The condition and management of the monument; and
  - c. The existing and future security of the monument
- G Major development and change of use proposals affecting a scheduled ancient monument will be required to provide and implement an action plan for the management of the monument.

### **Archaeology**

- H. In addition to (A) and (B) above, when considering proposals affecting an archaeological priority area, the Council will have regard to:
- a. The known or anticipated significance of the archaeology;
  - b. The likely implications of the proposal upon the archaeology; and
  - c. The need to preserve the archaeology in situ; or
  - d. The adequacy of arrangements for the investigation, recording, archiving and (where appropriate) curation of archaeology not requiring preservation in situ.

### **Local Areas of Special Character**

- I. Proposals within identified Local Areas of Special Character (LASCs) shall:
- a. Pay particular attention to the areas special character and the role of the area's setting in this regard; and
  - b. Exploit all opportunities to secure the future of the LASC; and
- J. The effect of an application on the significance of the LASC should be taken into account in determining the application. In weighing applications that directly or indirectly affect the LASC, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

### **Supporting Text**

Collectively and individually heritage assets are a unique, irreplaceable resource to be sustained for the present and future generations to understand and enjoy. When assessing proposals affecting heritage assets, including non-designated heritage assets, priority over other policies in the Local Plan will be afforded to the conservation of the assets affected and their setting as appropriate to the significance of the assets.

Many aspects of the historic environment, such as listed buildings and conservation areas, are 'living' places and need to be sustained through development, adaptation and active use. Public access to other aspects of the historic environment, such as archaeology or historic parks and gardens, can support tourism, education and the wellbeing of residents. The Council therefore recognises that change within the historic environment need not be at odds with heritage protection objectives.

The National Planning Policy Framework (2021) is clear that justification for substantial harm to (or total loss of) the significance of a designated heritage assets should be exceptional, and wholly exceptional in respect of those of higher grading, and that permission should be refused unless certain criteria are met. Proposals involving less than substantial harm to the significance of a designated heritage assets are required to be weighed against any public benefits, whilst proposals affecting non designated heritage assets should be subject to balanced judgements concerning the scale of harm and the significance of the asset.

Supplementary planning documents (SPDs) together with accompanying character appraisals and management plans have been published for the Borough's conservation areas. English Heritage also produce documents providing guidance on the conservation of heritage assets. The detailed policies and guidance set out in these documents, and further information relating to the significance of these assets such as historic Ordnance Survey maps, can provide further material considerations.

### Design & Character

Issues of design, appearance and character are the main considerations for additions and alterations to heritage assets, and new development affecting heritage assets. Replicating a particular style may be less important, though there are circumstances where it would be appropriate. Design should take account of the significance of nearby assets, topography, general character of the area, diversity or uniformity in style of the building and area, construction, materials, detailing, decoration and period of existing buildings and spaces; urban grain; current and historic uses; landscaping; and views (public and private).

The existing or original location and layout of heritage assets can make a significant contribution to their historical context and meaning. Similarly, the original use of a heritage asset will often be the most compatible with its character and fabric. Securing the appropriate and viable use of a heritage asset that is compatible with its character and fabric in the long term is an important part of its conservation. Proposals for below-ground (subterranean) development and modification of internal layouts can also impact upon the significance of heritage assets.

The survival of heritage assets is usually best achieved by ensuring that they are supported by viable economic uses compatible with the character and fabric of the asset which secure their repair and on-going maintenance needs in the long term.. Appropriate uses can breathe new life into listed buildings and conservation areas, and support opportunities for people to enjoy historic parks and gardens.

### Climate Change Adaptation

Proposals involving heritage assets can often provide opportunities to reduce their contribution to climate change and to increase their resilience to the anticipated consequences of climate change. Examples include funding of public realm improvements to encourage walking and cycling; sustainable drainage techniques to reduce flooding; the reuse of heritage assets to retain embodied carbon and to minimise the need for new building materials, energy and generation of construction waste. Where appropriate, heritage assets can also be modified to reduce carbon dioxide emissions for example by allowing greater use of renewable energy and options for insulation. Intrusive interventions, such as external mounting of microgeneration technology, can harm significance. The creative adaptation of



heritage assets can dramatically reduce the whole-life energy costs and waste impacts that would result from demolition and replacement.

Development and uses affecting heritage assets may provide opportunities to better reveal the significance of an asset or for people to enjoy it. Investigation of an asset and documentation of the findings may increase understanding of the history and significance of the asset. It is therefore an exercise of public benefit and so recording may be a requirement for a development, using planning obligations or conditions. Accessibility enhancements and the provision of interpretation facilities could improve levels of local appreciation of 'hidden' assets such as below-ground archaeology.

#### Public Access to Heritage Assets

Policy HC1 of the London Plan encourages boroughs to include policies for improving access to the historic environment and heritage assets and their settings. Permanent public access, such as that at Bentley Priory Museum, Harrow Museum and Headstone Manor, provide opportunities for residents and visitors to value the architectural and historic value of the Borough's heritage assets. Public access agreements or other provisions, as part of Planning Obligations or conditions for proposals associated with significant heritage assets, can provide opportunities to increase participation in such events - particularly where participation would widen appreciation of the Borough's heritage assets within their Greater London context - or secure more permanent public access to the historically or architecturally significant components of the heritage asset.

#### Redevelopment of Conservation Assets

The redevelopment of some sites within conservation areas may offer the opportunity to remove buildings or other features that detract from the character or appearance of the conservation area. Harrow's Conservation Area Supplementary Planning Documents (and their associated character appraisals and management plans) include provisions for redundant buildings, under-utilised sites and other structures/buildings that detract from the character and appearance of the areas concerned.

Some proposals may offer the opportunity to restore lost layouts, views/vistas, landscaping, boundary treatment or other features of significance to the conservation area. Similarly, opportunities may exist through new development to introduce new features. Again, Harrow's Conservation Area Supplementary Planning Documents (and their associated character appraisals and management plans) identify specific opportunities to restore specific features and it is recognised that development may bring unforeseen opportunities for the restoration or creation of new features.

#### Non-Designated Heritage Assets

Across the borough there are areas of notable value, but do not necessarily achieve Conservation Area status. Notwithstanding this, the contribution they make to the local environment warrants recognition and protection. This is due to their heritage significance as well as their townscape /architecture that is of locally cohesive and well-preserved quality and/or landscape that is of locally distinctive and well-preserved quality.

### Listed Buildings

There are over 300 statutorily listed buildings and over 700 locally listed buildings in Harrow. In numerical terms, therefore, listed buildings constitute the largest component of the Borough's historic environment. Particular care is needed to ensure that alterations, extensions and any other development affecting listed buildings does not prejudice their architectural or historic integrity, including that associated with their setting.

The Council endeavours to ensure that listed building owners are aware of their responsibilities. Statutory powers allow the Council to step in when listed buildings are seriously neglected. However, positive solutions that provides a viable, long-term future for listed buildings and which prevents them becoming 'at risk' are invariably preferable to the use of legal interventions, particularly in respect of buildings on the heritage at risk register (see paragraph 3.25 below).

Buildings of local interest in Harrow make a special contribution to the architectural and historic identity of the Borough. By inclusion on the Harrow list, the Council is highlighting their local significance to be taken into consideration when making planning decisions which affect them. Within conservation areas, local listing indicates that the building (or group of buildings) is of some significance to the character and appearance of the area. Outside of conservation areas, a building's (or group of buildings') inclusion on the local list demonstrates special local architectural or historical significance meriting retention.

### Archaeology

Harrow has a rich archaeological heritage. This reflects the geology and topography of the land which attracted early settlers and the Borough's proximity to London, which has dominated trade and governance in Britain since Roman times. The benign nature of the environment and landscape processes in the area has resulted in a legacy of well-preserved archaeological features. However, the greatest threat to archaeological resource has been, and remains, human activity particularly development.

Scheduled Ancient Monuments are a statutory designation for remains that are recognised as having national importance and are, therefore, safeguarded for their intrinsic value for the benefit of current and future generations. Scheduled Ancient Monuments in Harrow make a significant contribution to the Borough's heritage and are the most important sites of archaeological interest. However, Harrow's archaeological heritage includes some sites of more local significance as well as areas where insufficient evidence exists to justify formal scheduling. Locations within Harrow which are suspected to contain below ground archaeology, as advised by English Heritage, are designated as Archaeological Priority Areas.

The Council is committed to securing the conservation and understanding of all historic assets including those of archaeological interest. The Borough's Scheduled Ancient Monuments and Archaeological Priority Areas are shown on the Harrow Policies Map and further information about them is available via the Council's website. The desirability of preserving a scheduled ancient monument and its setting is a material consideration in the determination of planning applications. The National Planning Policy Framework (2021) establishes a clear presumption against the loss of, or substantial harm to, a scheduled ancient monument and states that any harm to a designated heritage asset, which is less than substantial, must be weighed against the

public benefits of the proposal. London Plan Policy HC.1 provides further planning decisions criteria relating to archaeological assets. Locations within Harrow which are suspected to contain below ground archaeology, upon the advice of English Heritage, are identified on Harrow's proposal map as archaeological priority areas. A number of these are related to features the subject of formal designation as Scheduled Ancient Monuments.

Developments where heritage assets of archaeological interest have been identified may be subject to mitigation measures in order to understand the asset. This might include field investigation or excavation and analysis, dissemination and archiving of results. The Council will also encourage community engagement and involvement in any programme of archaeological work.

**Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy HE2 Enabling Development

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter XX:*

### **Policy HE2 Enabling Development**

- A. Enabling development will only be supported where;
  - a. It is the only viable means of securing the long-term future of the heritage assets affected; and
  - b. The enabling development is the minimum necessary, as demonstrated by robust evidence, to secure the long-term future of the heritage assets affected.

### **Supporting Text**

The national context for enabling development is set out at paragraph 208 of the National Planning Policy Framework (2021). By definition, enabling development should be a tool of last resort after all other reasonable avenues that would secure the asset's survival have been exhausted.

There are 15 of the Borough's heritage assets on the English Heritage London Heritage at Risk Register (2012). These comprise 10 buildings/structures, 1 registered park and garden, and 4 scheduled ancient monuments. The Council takes its responsibility to help secure the conservation of heritage assets for future generations' enjoyment seriously, and to this end has been working positively with owners and other partners to ensure the survival of assets on the register and to avoid others being added to the register. In a number of instances, sensitive enabling development has been approved (or agreed in principle) to secure the restoration and conservation of heritage assets.

Where enabling development has been proposed as the last resort to secure a heritage assets survival, applications must be supported with comprehensive evidence to demonstrate that the enabling development is the absolute minimum required.

Proposals should follow the guidance (including required documentation) set out in the Historic England guidance note; Enabling Development and Heritage Assets (Historic Environment Good Practice Advice in Planning Note 4 (and any superseding guidance)).

The Council understands that higher revenue uses (such as residential) may be required to enable the long-term future of a heritage asset to be secured. However, a programme of works to set out when each of the components of a development are expected to be delivered must support any planning applications. The Council will expect the heritage asset to be delivered before the enabling development is fully occupied. The level of occupancy will vary from scheme to scheme, but will be agreed by the Council and secured through a S.106 legal agreement.

**Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

# Chapter 04: Housing

## Strategic Policy 03: Meeting Harrow's Housing Needs

Linkages:

NPPF Chapter XX:

London Plan Chapter XX:

### Strategic Policy 03: Meeting Harrow's Housing Needs

#### **Housing delivery:**

- 1 The Council will optimise opportunities to deliver a minimum of 16,040 (net) homes during the Plan period (2019/20 – 2040/41), of which at least 8,020 new homes (net) will be delivered between 2019 -2029 (Policy H1, London Plan), to address the future needs within the most sustainable locations of Borough. Based on current estimates of the Borough housing capacity from all sources, the 10-year housing delivery target will be met.
- 2 The London Plan (2021) includes a target to deliver a minimum of 3,750<sup>1</sup> (net) homes on small sites (below 0.25ha) across the Borough between 2019 -2029.
- 3 The Council will support the delivery of new housing on a range of suitable sized sites, prioritising previously developed land, within the following locations;
  - A. **Harrow and Wealdstone Opportunity Area:** A minimum of 7,500 will be delivered through extant permissions and on allocated sites within the opportunity area.
  - B. **Rest of the Borough:** A minimum of 2,500 will be delivered through extant permissions and on allocated sites across the rest of the Borough.
  - C. **Small Sites:** A minimum of 4,125 new homes on small sites (below 0.25ha) will be supported on allocated sites within the Plan and windfalls sites, in locations with good public transport accessibility (PTAL 3-6) and on sites within 800m of a tube, rail stations or Major or District town centre boundary, providing they are sensitively designed to protect and enhance the character of the Borough, particularly suburban areas.
  - D. **Windfall sites:** Development of new housing on suitable sites (below/above 0.25ha), not identified within the Local Plan will be supported, provided it does not adversely impact the character of area, the existing and planned capacity of infrastructure and complies with other policies of the development Plan.
- 4 New development will be directed towards the locations where infrastructure has the most capacity to accommodate new homes, whilst respecting their local distinctiveness, local character and protecting the borough's physical, natural, historic environment, as well as recognising the most accessible locations (PTAL 3-6) of the Borough will change over time. Development within suburban areas that have a low public transport accessibility and limited infrastructure capacity will be of a modest scale and will be required to protect, enhance and re-enforce the unique character of these locations.

#### **Housing Choice**

<sup>1</sup> NB This is a component of the London Plan 10-year housing delivery target of 8020 homes and not addition to this.

- 5 Development will be expected to provide a choice of housing and deliver inclusive, mixed and sustainable communities to address local and strategic housing needs, across the Borough. This will be achieved through;
- A. **Genuinely Affordable housing:** Over the plan period the Council seek to ensure; at least 50% (8,000) of all new dwellings delivered from all sources of housing supply across the Borough will be affordable to low-income groups. At least 70% of all these will be low cost rented housing and the remainder will be Intermediate products which will be genuinely affordable based on lower quartile/median housing costs and incomes of Harrow residents.
  - B. **Mix of Housing by size:** A strategic target has been set to ensure a minimum 25% (4,000) of all new dwellings delivered are three bed (or more) family sized dwellings across the Borough over the plan period.
  - C. **Specialist older people housing:**
    - a) The housing needs of older people will be met through:
      - i) Prioritising the delivery of new conventional residential accommodation in C3 use class, designed to be adaptable to the varying needs of users over their lifetime, as well as via retrofitting the existing stock.
      - ii) The delivery of specialist older persons accommodation (C3) with different levels of support, and care home accommodation (C2). These should play a supplementary role to conventional C3 housing that are adaptable to the changing needs over time
      - iii) The delivery of low-cost rented housing within older person accommodation schemes,
    - b) The Council will work positively with providers, to support the delivery of a minimum 980 units of specialist older person accommodation, comprising retirement housing units extra care housing units between 2022- 32, to address the future needs of an ageing population. A total of 200 bed spaces for nursing care will be delivered, to address the needs of the elderly population or those who have serious health issues that require specialist care, between 2022-32.
  - D. **Supported and specialist Accommodation:** The Council will work positively with the relevant authorities such as the NHS and charities, to ensure additional well designed supported and specialist accommodation is delivered, to address the requirements of specific users or groups (particularly marginalised, vulnerable individuals or groups) providing the applicant can demonstrate a need for the proposal. The Council will seek to resist the loss of existing accommodation to other uses, unless the proposal is for re-purposed, enhanced or for re-location of the use and it would comply with other policies in the Plan.
  - E. **Non-self-contained accommodation:** The Council will support the provision of non-self-contained housing such as Houses in multiple occupancy (HMOs), Hostels, Large Scale Purpose-Built Shared Living (LSPBSL) or Purpose-Built Student Accommodation (PBSA). This is providing;
    - a. A need is demonstrated for PBSA, LSPBSL products and the proposal is not situated on a site that has extant permission or is allocated for self-contained housing
    - b. Proposals make a positive contribution to housing choice and create mixed and balanced communities.



c. The level of non-self-contained housing provided does not result in an over concentration of such uses, result in harmful amenity impacts and compromise the delivery of additional self-contained housing to meet the future Borough needs and support mixed inclusive communities.

F. **Self-build and custom build housing:** The Council will support proposals, for self-build and Custom build housing, particularly community led schemes, to diversify sources of housing supply, speed up housing delivery, encourage innovate design and further housing choice to address local needs. Such developments will need to demonstrate compliance with relevant policies of the Development Plan, particularly in relation to the provision of affordable and family sized housing.

G. **Gypsy and Traveller accommodation:** The Council will maintain the existing provision of Gypsy and Traveller pitches. A total of three additional pitches will be delivered between 2016 – 41. The existing identified needs, and if any additional needs arise, will be addressed within an existing site.<sup>2</sup>

### **Estate regeneration**

6. The Council will positively work with local communities, existing residents, and other stakeholders to support opportunities that arise for estate renewal and regeneration during the Plan period. This will play an important role to :

a. Increase the provision of the right type., size, tenure of housing to address local needs and meet the strategic targets

b. Ensure residents have access to additional high quality affordable and family sized dwellings to adequately address the needs of existing and future residents

c. Address the causes and impacts of multiple deprivation within them and wider areas (where relevant to the proposed scheme)

d. Ensure neighbourhoods and communities benefit from living within high quality environments, with access to communal and other facilities within the estates (if necessary) or wider area, as well as are well designed, safe, inclusive and promote the health and well- being of communities.

e. Ensure existing and new residential units achieve high quality design standards

f. Promote social interaction, cohesion between the residents to support mixed and inclusive communities.

g. Ensure residential accommodation and other facilities are maintained at a decent high-quality standard throughout their life

7. The Council will work with a range of stakeholders to support the delivery of phases 2 and 3 of the Grange Farm Estate regeneration scheme during the life of the Plan. This will deliver an exemplary mixed tenure community, with new residential accommodation built to high quality design and Development Plan housing standards, with a range of housing types and tenures, sizes to address the needs of existing and future residents, particularly for families and local income households who require social rented housing.

### **Safeguarding the existing housing stock**

<sup>2</sup> NB. This figure based on the West London Alliance Gypsy and Traveller Needs Assessment (2018). This will be updated based on the findings of the GLA London wide GTANA. The final document is expected to be published by the end of Spring 2025.

8. Existing self-contained C3 housing will be safeguarded in accordance with London Plan policy. Exceptionally, the net loss of self-contained residential accommodation may be acceptable where:
  - A. Sub-standard dwellings would be brought in line with London Plan space standards;
  - B. The proposal is for specialist non-self-contained accommodation (use class C2) to meet an identified local need in accordance with the requirements of Local Plan policy H8;
  - C. De-conversion of flats would create a family size home (3 bed or more)
  - D. Providing social or physical infrastructure to meet an identified local need which could otherwise not be met elsewhere.
  - E. The net loss of existing affordable housing units and floorspace – overall and in terms of social rented housing – will be resisted.
  - F. A change of use from housing to short-stay holiday rental accommodation to be used for more than 90 days a year will be resisted.

**Implementation:**
9. The Council will monitor the implementation of the Plan against the above targets, including through the use of the housing trajectory (Appendix XX) and the monitoring implementation framework (Appendix XX), to address future housing needs and maintain a five-land supply of deliverable sites.

### Supporting Text:

#### Housing needs and requirement

The NPPF (Para 61, 2023) indicates that strategic policies should be ‘informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area’. It further indicates ‘there may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need’. The Draft Harrow Local Housing Need Assessment (LHNA, 2022) indicated that this would result in a capped figure of 2,490 dwellings per annum and an uncapped figure of 3,129 dwellings per annum. However, as Harrow is located within Greater London, it is considered exceptional circumstances exist to justify an alternative method for calculating future housing needs and subsequent housing requirement. This approach is justified by factors such as the Practice Guidance that states, “the responsibility for the overall distribution of housing need in London lies with the mayor as opposed to individual boroughs so there is no policy assumption that this level of need will be met within the individual borough”. Further, the Secretary of State’s letter to London Plan indicates that an early review is required for this to assess housing need based on Standard Methodology, but no direction was issued for Boroughs to include a Local Plan housing target/requirement based on standard methodology.

The Draft LHNA (2022) utilises two approaches to estimate the minimum number of additional homes that may need to be delivered, the type, size to address the future housing needs of the area, over the life of the Local Plan (15-20 years).

The first approach of the Draft LHNA utilised the ONS 2018 population and household projections to estimate the level of future housing need between 2021-41. This considers factors such as changes to the level of migration, household sizes, fertility and household sizes. This estimates the number of households are expected to increase by 15,200 (2021-41), and takes account of vacant/second homes, older people in C2 homes who were not included in statistics. Further, it indicated an uplift to the need figure is required, by applying a 2001 household formation rate to all those below 45, to account of the issue that household sizes may have unsustainably increased since 2001, as young people were unable to move out /afford suitably sized housing that addressed their needs and delayed forming families until later in life. Therefore, this approach assumed an additional 8400 dwellings are required, to address pent up demand for housing, which results in a total need of 24,266 homes required between 2020-41.

The second approach of the Draft LHNA assumes the London Plan 10-year housing delivery target of 802 per annum (2019-29) is rolled over for another 10 years to cover the life of the Plan. This suggests an overall housing need figure of 16,040 homes between 2021 and 41. The London Plan Policy H1 of the London Plan sets the Borough a ten-year housing delivery target of 8020 units (including 3750 units on small sites) between 2019- 29, which is related to the needs of the Borough and wider London. This figure also reflects the identified capacity for homes of sites that the GLA considered will become available, based on the 2017 SHLAA. The supporting text of the policy states that " *If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.*"

It should be noted that the NPPF requires Local Plans to cover a period of 15 years from the date of adoption. It is good practice to produce a Plan covering more than 10 years, as there can be time lag in the delivery of large strategic sites and their supporting infrastructure due to factors such as gaining planning permission, market conditions, access to finance and viability. Therefore, as the Plan is expected to be adopted in 2025, the Plan is proposed to cover a period between 2021-41 (i.e. 15/16 years upon adoption).

The Council's proposed preferred approach is to adopt a housing requirement/target of 16,040 homes between 2020-41 (being the annualised London Plan target of 802 homes per year over the 20-year plan period), in compliance with the London Plan. The target includes self-contained residential units and non-self-contained residential accommodation, including specialist housing for students and older people in use classes C2, C3 and C4 or sui generis.

**Table H1; Borough Housing supply**

Sources of housing supply	Deductions		Sub totals	Totals
	H & W Opportunity Area	Rest of Borough		
Local Plan Housing requirement (2021-41)				16040

Sources of housing supply	Deductions		Sub totals	Totals	
	H & W Opportunity Area	Rest of Borough			
- Less capacity of large housing sites under construction	2756	293	3049		
- Less capacity of small housing sites under construction	42	180	222		
<b>Total under construction (31/03/22)</b>	<b>2798</b>	<b>473</b>			<b>3271</b>
Large sites with permission	837	1041	1878		
Small sites with permission	55	279	334		
Sites with legal agreement	64	44	108		
<b>Total permissions (31/03/22)</b>	<b>956</b>	<b>1364</b>			<b>2320</b>
	<b>Low range<sub>3</sub></b>	<b>High range</b>			
Unimplemented major sites allocations <sup>4</sup>	3439	3757	389	3828 - 4146	
Unimplemented small site allocations/other identified sites			7	7	
<b>Total estimated indicative capacity of allocation</b>	<b>3439</b>	<b>3757</b>	<b>396</b>	<b>7</b>	<b>3835 - 4153</b>
				<b>Low range</b>	<b>High range</b>
Small sites windfall allowance (SSWA).  The SSWA is applied from the date of expected Plan adoption (2025) less 5 years				<b>3300<sup>5</sup></b>	<b>4125<sup>6</sup></b>
Less capacity of housing sites completed between 2019/20- 2021-22		1256 +802			<b>2058</b>
<b>Outstanding housing requirement/ housing Capacity of allocations that need to be identified</b>					<b>1256 – 113</b>

The table above considers the potential housing supply and capacity from a range of sources, such as existing permissions, constructions, completions, allocations and small sites windfalls against the proposed Local Plan housing need/requirement of 16,040 units. In accordance with the London Plan, this demonstrates that a significant proportion of future capacity will be provided within the Opportunity Area. The total housing capacity of existing unimplemented allocations is a range of between circa 3800 – 4100 homes and the capacity of sites with permissions is 2320 homes. Further, in accordance with the London Plan a small sites windfall allowance (SSWA) is

<sup>3</sup> A capacity range was included due to the uncertainty in relation to estimating an appropriate number of dwellings that could be delivered on some of the existing allocations, subject to further evidence. Please see Appendix 1 of this chapter for information on existing implemented major housing allocations and their total estimated indicative capacity.

<sup>4</sup> The total estimated indicative housing capacity of unimplemented major housing allocations was based upon the most updated information, as at 07/09/23. These figures are likely to be updated/undergo further reiterations, based on Local Plan evidence at different stages of the plan making process

<sup>5</sup> The low range assumes for the SSWA is based on past average housing delivery rate on small sites (.i.e. 300\*11)

<sup>6</sup> The high range assumes it appropriate to apply a SSWA of 375 homes per annum (\*11 years) based on the target included within the London Plan Policy H2

included for Plan period, as it can contribute to the anticipated future supply of housing to meet future needs, as well as can be used to demonstrate a five-year land supply of deliverable housing sites. The low range for the SSWA of 3300 homes (i.e. 300 \*11 years) is based on average past housing delivery on small sites. Whilst the high range for the SSWA of 4125 (375 \*11 years) uses a SSWA of 375 homes per annum is based on the target included within Policy H2 of the London Plan (2021)

The Council will undertake a further review of the evidence base to assess whether capacity from all sources of housing supply (including the SSWA) will satisfy the future needs of the borough. For example, a formal Call for Sites consultation will be undertaken during the same time as the Draft Local Plan (Regulation 18) consultation to enable stakeholders to submit potential development sites for new housing (and other uses) to the Council to consider for potential allocation in the Plan. This process will assess the availability, suitability, development capacity of site submissions, existing unimplemented allocations and their delivery timescales. A design led capacity assessment will be undertaken to determine the optimum number of homes that may be delivered on the potential allocations, in accordance with the London Plan. The findings of this and other evidence-based studies such as Infrastructure Delivery Plan and Integrated Impact Assessment, the London Plan and national policy will help the Council determine which sites should be taken forward during the next stage of the Plan making process and drafting policies for assessing applications. More details of the proposed housing site allocations, their locations and their potential capacity will be included in the Draft Local Plan that will be produced during the next stage of the Plan making process and will published (Regulations 19) consultation with all stakeholders.

In accordance with the London Plan (2021), the Plan is considered to meet the 10-year housing delivery target of 8020 homes between 2019-29 (e.g. existing capacity of sites completed, under construction and permissions = 7,649 homes). Further, the NPPF (2023, para 22), requires Plans to look ahead for 15 years, and the requirement for specific, deliverable sites is focused on years 1 to 5 of the plan period. Paragraph 69 of the NPPF includes a more open approach for the subsequent years of the Plan period, stating that for years 6-10, development plans have a choice between specific, developable sites, or broad locations for growth, whilst this requirement is only required “where possible” for years 11-15 of the Plan. This in part reflects greater levels of uncertainty in later phases of the Plan and that the NPPF requires that Local Plans are reviewed every five years.

National Policy requires the Council to annually monitor the potential to deliver the housing target and actual delivery against this. The council is required to demonstrate in the future a five-year supply of deliverable housing sites. Further, the housing delivery test requires the council to monitor actual housing delivery and ensure it does not fall below 75% against the housing target over a three-year period. If the Council fail to meet either of these, this could have potentially significant consequences for the Council, as the presumption in favour of sustainable development included in national policy could apply and local plan policies could have less weight or be overridden by national policy, when determining planning applications. This means that it may be more difficult for the Council to refuse housing applications that may poorly designed, located or the wrong type of housing, via local decision making and appeal process. This could lead to outcomes which neither the Council nor residents/ businesses support. As such the council will endeavour to undertake the necessary actions to

ensure that it can achieve the required number of homes, ensure they are deliverable, including supporting delivery of homes on its own land portfolio and estates if options are identified during the life of the Plan.

### **Reasonable Alternatives:**

#### **Option 1: High housing growth**

This would result in the inclusion of a housing requirement of 24,266 dwellings (1213 units per annum) between 2020-41 based on the demographic led approach utilised by the Draft Local Housing Needs Assessment. This is based on 2018 household and population projections and considers factors such as household sizes, mortality, migration, and past suppressed household formation rates of those under 45 years of age.

This approach is not considered the preferred option due to a number of factors. The London Plan (2021) sets a Borough ten-year target of 8020 homes (2019-29) and indicates a target beyond this period should be based on evidence of capacity. Housing monitoring data indicates a total of 8,410 homes were delivered between 2009/10- 2020/21 (i.e. average of 841), which means it is likely to be difficult for the Borough to increase delivery of housing on previously developed sites to meet this within the existing urban area, beyond the London Plan target. This option is likely to require the release of greenfield sites, including within the Green Belt or Metropolitan Open Land (or the potential loss of employment land) and the Local Plan evidence does not demonstrate that any exceptional circumstances exist to justify this approach. This may impact the Council's ability to maintain a five year land supply of deliverable sites and meet the housing delivery test and result in the national policy of presumption in favour of sustainable development applying when considering applications. This may undermine the plan led system and the promotion of sustainable development of the Borough. .

#### **Option 2 Low housing growth: Stepped trajectory over a fifteen-year plan period**

This would be based on the London Plan ten-year housing deliver target of 8020 homes (2019-29) and the need beyond this period would be based on the 2017 London SHLAA. This would comprise of the indicative capacity of large sites of 921 homes (phases 4: 2029-34) and 138 homes (phases 5:2034 -41), plus the London Plan small sites allowance of 3750 homes (10 years), all of which would total 4809 homes. Therefore, this approach results in a total housing requirement of 12,829 homes over a 20-year period (2021 -41). This assumes a higher housing requirement/need of 802 homes per annum over the first ten years (2019-29) and a lower need of 481 homes per annum during the final phases of the Plan. It should be noted the NPPF requires Plans to cover a 15-year period from the date of adoption.

At present, this approach is not considered the preferred option as further evidence base is being undertaken to identify additional housing capacity (namely through the call-for-sites process running parallel with the Regulation 18 consultation). The London Plan (2021) states that any capacity beyond 2029 "should draw on the London 2017 SHLAA findings and any local evidence of identified capacity ". Therefore, the housing requirement/target will need to be based on updated local evidence of the housing capacity of the Borough.

## Policy HO1: Dwelling size mix

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter 4 Housing*

### Policy HO1: Dwelling size mix

#### A. Dwelling size mix priorities

- 1 All developments for conventional residential must provide a good mix of unit sizes, to adequately address the Borough's housing needs, particularly for families, as well as contribute to and support the creation of inclusive and mixed communities. To achieve this, proposals must apply the following sequential approach to housing priorities:
  - i) Ensure a minimum of 25% of all units within a scheme are family sized dwellings (three bedrooms or more) and a higher proportion will be required on suitable sites;
  - ii) the remaining dwelling size mix will be determined on a case-by-case basis having regard to:
    - a. Need to provide an appropriate mix of dwelling types reflecting the most up to date evidence as set out in the Local Housing Needs Assessment (or successor documents) and local housing register;
    - b. Site size and its physical characteristics (including any identified constraints on the preferred housing mix);
    - c. Location of the site, the surrounding context, character (including town centre location) and the Public Transport Accessibility Levels;
    - d. Need to optimise housing output on previously developed land;
    - e. The range of tenures and the extent to which flexibility around the mix of market units could secure the delivery of additional affordable dwellings; and
    - f. Potential for custom-build and community led schemes.
- 2 Development that fails to adequately accord with the delivery of the above requirements will be resisted, unless robust evidence demonstrates it would be unsuitable due to site/design considerations or be financially unviable.
- 3 The smallest 2-bedroom dwellings for both market and affordable homes provide a minimum of 4 bed spaces in accordance with the minimum internal space standards for new dwellings set out in London Plan Policy D6, to ensure flexibility to the changing circumstances of households and avoid overcrowding.

#### B. Flatted developments

- 4 Flatted developments will be required to give the highest priority to the provision of accommodation for families, on the lower floors of the scheme, with direct access to a private garden or communal amenity space. These should be well designed to address the needs of family members who may be disabled and elderly. Proposals that fail to meet this requirement will be resisted, unless it can be demonstrated that the

scheme would result in a poor-quality living environment for families; based on the above criteria.

**C. Housing schemes solely comprising of smaller units**

- 5 Development proposals comprising solely of studios and/or 1 bedroom, 1 person units, or those that will result in an overconcentration of 1- or 2-bedroom units on an individual site, will be resisted unless it can be suitably demonstrated that the housing provision:
  - a. Is in an area with higher Public Transport Access Levels (i.e. PTAL 3-6); and
  - b. Forms part of a larger development, or is located within an area for which a masterplan has been adopted or endorsed by the Council, which includes provision for a mix of unit sizes, including a reasonable number of family-sized dwellings (3+ bedrooms); or
  - c. Provides for a balance in the mix of unit sizes in the area; or
  - d. Is the only housing format deliverable by reason of site size, site configuration or other development constraints, and where a studio unit is proposed.
- 6 An exception to the above (5) will apply to proposals for older person accommodation/other types of occupants with specific needs and it can be demonstrated 1-bedroom units is the most appropriate form of accommodation.

**D. Monitoring**

- 7 The Council's dwelling size priorities will be subject to periodic review and updated when new assessments of housing need are commissioned. Through the Annual Monitoring Report (AMR) the Council will set out progress on delivering these priorities and building the right homes for the next generation. The AMR will assist in informing the Council's consideration of dwelling mix on a site-by-site basis.

**Supporting Text:**

Development proposals for new housing will need to demonstrate the proposed size and mix of housing will meet the diverse needs of existing and future households, as well as contribute to and support inclusive and mixed communities. This policy seeks to increase the delivery of new housing through optimising the capacity of previously developed sites, whilst ensuring the right size, tenure and type of housing is delivered in the most appropriate locations. This will help address the needs of the anticipated increase in the population, households and the corresponding demographic changes during the plan period (2021-41). The strategic priority of the Local Plan is to increase the delivery of family accommodation to adequately address local needs. The London Plan (2021) defines family housing as "a dwelling that by virtue of its size, layout and design is suitable for a family to live in and generally having three, four, five or more bedrooms".

The key challenge for the Plan is to increase the delivery of family housing that generally tends to be developed at a lower density, whilst balancing this with the requirement to meet London Plan housing targets where a significant proportion of



dwellings are assumed to be smaller dwellings. In terms of smaller sized units, the priority is to provide a higher proportion of two bed units, capable of accommodating four bed spaces, to provide more affordable housing options for other households (e.g. young and retired couples, families with young children and smaller sized households) that are more flexible to their changing circumstances within the most accessible locations of the Borough. These will also help reduce overcrowding issues within the existing stock of one bed units and help release under occupied family housing.

The 2021 census indicates the number of households increased by 6.3% (circa 5332) to a total of 89,600 units between 2011-21. During this period, larger sized households of 4 or more persons (i.e. 40% of total increase), families with children (58% of total increase) experienced significant growth and other households (including multi generation) increased by 10%. Further, 7 person (52%/430) and 8 person households (156%/912) experienced a significant level of growth, which means there has been a rise in multi generation households residing in a single unit or over-crowded housing (i.e. 14.4% of households) due to affordability of housing or the lack of availability of suitable larger family accommodation. In contrast, the Census indicates that the stock of terraced, detached and semi-detached housing declined by 3% (1541 units) between 2011-21, whilst purpose-built flats (including bedsits) increased by 17% (4495 units). Due to this, the number of one bed and two bed units have significantly increased (i.e. 17%, 6% or 1727, 1259 units, retrospectively) and three bed dwellings have declined by 7% (2631) units. Therefore, there is currently an imbalance between the demand/need and the supply for family sized housing (3 bedrooms or more).

The Mayor's Strategic Housing Market Assessment (2017) highlights that one bed units are the largest requirement for market and affordable housing in London (i.e. third of need between 2016-41), based on a model that assumed that any single person or couple aged over 25 years who wish to occupy their own property will do so, irrespective of whether they can afford to do so or not (Draft LHNA, 2022). In contrast, the Council has undertaken a Draft Local Housing Needs Assessment (LHNA, 2022) to gain an understanding of the required future housing and tenure mix to meet future needs. The key findings are; families with children are expected to experience the greatest increase from all household types and account for circa 25% (3600) of the growth in households between 2021-41. Other households which include multi person households are expected to increase by 36% (2800), which is largely driven by multi generation households with older persons living with their family. Couples without children are likely to see significant growth (31%, 9300), but this is largely driven by older (55-64 age group +24% of increase, 2270) and the retirement age (65-85. Age group, +7400), whilst the working age groups (25-54) will see an overall net decline of 400 people. Whilst single person households between the 15-64 age groups are expected to see an overall decline of 23% (2000) and the only groups in this category that experience an increase 75-84 and 85+ retirement ages households.

The LHNA estimated the future housing size mix by tenure to address future needs, which will be updated periodically when new LHNA's are commissioned. This will be used to inform a residential development's size mix particularly in terms of affordable homes provision. Where developments are providing affordable housing however, the council encourages early engagement as there may be specific needs in that area that are a greater priority to address. The LHNA indicates there is a significant level of need to increase the delivery of family sized housing (i.e. 3 bed or more), as part of

any housing mix. For market housing, there is a high priority to increase the delivery of family sized housing, medium priority to delivery two bed units and a lower priority to deliver smaller sized units (1 bed or studio units).

The LHNA indicates the future need for the size mix for affordable housing is more varied (than market housing) to ensure this addresses the needs and remains affordable for households with a range of incomes. Within social rented and London living rented housing there is a lack of need for one bed units due to the significant over-crowding in the existing stock, a high priority to deliver 3 bed social rented and a medium priority to deliver two bed housing as they provide more flexibility to changing circumstances of households. Within Affordable home ownership accommodation, there is a high level of priority to deliver two bed units, followed by one bed units and a low priority to deliver larger three bed or more units due to affordability constraints of households. Although the priority is to increase the delivery of affordable family housing, a range of factors will be considered to determine an appropriate size mix of affordable housing products on a site-by-site basis. This includes; the site size, location, character of the area the need to maximise the delivery of affordable housing on site, viability as well as level of local need for specific sized housing based on the housing register.

Given the significant need for family housing in the affordable and market tenures, the policy requires developers to ensure 25% of all dwellings delivered on site are three bed (or more) units and a higher proportion than this are delivered on suitable sites, to address the housing needs of families. The dwelling size mix of the remaining units within the scheme will be determined on a case-by-case basis, based on consideration of a range of factors such as the site size, physical characteristics, location, the need to optimise housing output and deliver affordable housing. Proposals that fail to comply with the requirements of this policy in relation to delivering an appropriate dwelling size mix will be resisted, unless this supported by robust evidence.

The above approach will help ensure an appropriate balance is achieved between a competing set of factors, such as; increasing the delivery of housing to fully address the future housing needs of the area (particularly families) by optimising the housing output of sites, the need to take account of the site size, constraints, location, character of the area and viability. In addition, there is a low priority to deliver one bed and two bed market housing because the number of single person households of working age are expected to decline, couple households without are not expected to increase and the overcrowding of the existing stock.

To help secure inclusive and mixed communities, there is a need to promote a more varied size mix in future housing developments, to avoid the oversupply and concentration of smaller housing units, overcrowded housing, increasing flexibility of housing for the changing circumstances of households, as well as increase the potential to deliver three bed or more units on suitable sites and locations. The key measures that are proposed to help achieve this are outlined below.

The Council will resist development proposals that comprise solely of studios and 1 bedroom, 1 person units or developments that will result in an overconcentration of 1- or 2-bedroom units on a site or local area. London Plan policy H10 (Housing size mix) makes clear that developments with a higher proportion of 1- and 2-bedroom units are generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity. This policy is considered to

provide sufficient flexibility to respond to individual site circumstances. For example, in situations where there are site development constraints or where proposals for such provision would demonstrably enhance the mix and balance of housing unit types within a larger development site or local area. In addition, it acknowledges that there may be instances where 1 bedroom unit schemes may be required to address the needs for older people. Studio units and 1 bed/1 person units intended for single person occupation are not considered to provide a long-term, sustainable solution to meeting local housing need.

The Council will require well designed two-bedroom properties to be capable of accommodating 4 bedspaces (in line with the London Plan Internal Space standards), to ensure flexibility to changing circumstances of households, reduce overcrowding and help address the needs of families who are unable to access or afford suitable three bed units.

Flatted schemes will be required to provide family accommodation on the lower floors, with access to private gardens or communal outdoor amenity space. In addition, these should be well designed for the use of family members who may be elderly or have a physical disability, sensory health issues (i.e. light, noise) or suffer from autism.

### **Reasonable Alternatives:**

#### **Option 1: Continue with existing policy DM 24 Housing mix**

This is highly permissive. It seeks to ensure mixed and inclusive communities. The mix is determined by target mix for affordable housing, the need to increase delivery of affordable housing, site location, character of surroundings and the need to optimise housing output on previously developed land site. This policy provides no specific requirements for the size of units required for market housing that will form a significant proportion of future housing delivery and would reduce the scope of the Council to secure a higher proportion of larger dwellings or medium sized accommodation that are suitable for addressing the needs of families. This policy is not considered the preferred option, as it is likely to result in the delivery of a larger level of smaller units that will not assist in delivering against the evidenced needs of the borough as set out in the Draft LHNA.

#### **Option 2: Do not include a target to that seeks to ensure 25% of housing delivered on a scheme are family sized dwellings (i.e. three bed or more)**

This approach is not considered the preferred option, as it is likely to reduce the level of family sized dwellings delivered. Key reasons are, it would reduce Council's scope to require a higher proportion of family or medium sized dwellings that are suitable for families, as well require applicants to provide evidence they have considered this. This is likely to encourage developers to build at higher densities and increase the number of smaller units, to maximise development value. Further, this would be contrary to the good planning practice of assessing the effectiveness of policy via the plan, monitor and manage approach.

#### **Option 3: include a target in excess of 25% for the proportion of housing on a scheme that should be for family housing**

The Draft LHNA indicates there is a significant need to increase the delivery of family housing. This indicates 70% of all future housing delivered should be three bed (or more) family dwellings, based on a requirement/target of 16,040 homes during the Plan period. This approach to set a target to deliver family housing in excess of 25% is not considered the preferred option, as there is need to achieve a balance between a set of competing factors such as; the type of sites that are likely to come forward for development, their locations; the need to optimise output of sites to increase the delivery of housing to meet future needs; as well as ensure the deliverability of sites. The preferred policy expresses the 25% target as a minimum, which provides scope for more than 25% of housing to be family housing to be secured on a site specific basis.

#### **Option 4: Do not apply 25% family housing target to minor development**

This approach is not considered the preferred option, as the London Plan anticipates that 47% of the Borough's future housing supply will come forward from small sites (below 0.25h). Therefore, this will reduce the Council's scope to increase provision of family housing from all the sites that come forward for development and address local needs.

## Policy HO2: Conversion and redevelopment of larger dwellings

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter 4 Housing*

### **Policy HO2: Conversion and redevelopment of larger dwellings**

1. To effectively manage housing growth and ensure that residential conversions into multiple homes do not have a detrimental impact on the character, stock of family sized housing and amenity of local areas; permission will only be granted for proposals for the conversion of larger homes into smaller self-contained residential units (C3) where the criteria below are met:
  - a. The internal floor area of the existing dwelling should exceed 130m<sup>2</sup> (as originally built) or could be accepted to be extended to this size; where 2 self-contained residential units or more are proposed.
  - b. The conversion should provide at least one larger family sized home with a gross internal floor area of at least 74 m<sup>2</sup> and be capable of providing a 3-bedroom, 4-person dwelling on the ground floor or if this is not possible on the upper floor(s); with access to a dedicated rear garden of the converted home.
  - c. The site is within area of PTAL 3-6.
2. Proposals will be required to;
  - a. Comply with the minimum internal space standards of the London Plan
  - b. Ensure the converted flat on ground floor is well designed to adequately meet the needs of a range of future residents, particularly older persons and those with physical disabilities.
  - c. Achieve configurations that are practical and fit for purpose, having regard to circulation, storage space, room size and shape and relationship with other homes;
  - e. Ensure homes are dual aspect and that all habitable rooms have a satisfactory environment in terms of privacy, daylight, sunlight, outlook and exposure to external noise;
  - f. Make adequate arrangements for the provision of amenity space for future occupiers of the development;
  - g. Make adequate arrangements for the storage and collection of waste and recycling material generated by future occupiers of the development which does not give rise to harm to; the character, amenity of the area; and for future and neighbouring occupiers;
  - h. Ensure that the design of any external alterations does not detract from the appearance of the property or the street scene and, wherever possible, retain a single door to the front elevation of dwellings in residential areas;
  - i. Demonstrate adequate measures are taken to increase the level of and enhance soft landscaping on the forecourt (including forecourts that are already substantially hard surfaced) and limit the need for hard landscaping areas, to ensure proposals do not detract from the appearance of the property or the street scene, as well as support urban greening and net gains in biodiversity;

- j. Make adequate provision for parking and safe access to and within the site and not lead to any material increase in substandard vehicular access; , including safe and accessible cycle storage
  - k. Ensure that levels of external activity would not be detrimental to residential amenity and character.
  - l. Demonstrates compliance with any relevant supporting guidance
3. Proposals for extensions and alterations to converted houses and other residential premises will be supported having regard to the above criteria.
  4. Proposals that would lead to an over intensive conversion, redevelopment or which would compromise any component of this policy, will be refused.
  5. The Council will also apply the above criteria to any proposals for the demolition and redevelopment of a larger home to provide 2 flats and the housing mix policy will apply to proposals will result in three (or more) residential units

### Supporting Text:

The Draft Local Housing needs assessment indicates there is a high priority to increase the provision of family housing (3 bedroom or more) to address the needs of existing and future households in the area (i.e. families with children, multi generation families), reduce overcrowding, and provide housing options that are affordable and suitable for younger families and lower income households. Further, the area is anticipated to experience an ageing population and this policy will help address the potential increase in the under occupation of existing dwellings, as well as enable families to live within proximity to one another and take care of elderly or younger members. A significant proportion of proposed housing growth is anticipated to be accommodated within the Harrow & Wealdstone Opportunity Area and close to/within town centres, stations which may impact the scope to deliver additional family sized dwellings and replace the loss of the existing stock. In addition, it is also important policies encourage the delivery of high quality and well-designed dwellings.

This policy sets out an approach to determine proposals to convert large family housing into multiple flats and seeks to restrict the loss of them via the re-provision of a minimum three bed flats. It sets the considerations for assessing proposals and aims to address the multiple issues facing the area (noted above), whilst achieving a balance between the need to maintain the existing stock of family dwellings, increase the delivery of additional housing to meet future needs and affordable housing options via new flats. It also must balance this with concerns from existing residents in relation to the potential issues that can arise from a high concentration of flats from conversion of housing; such as the potential detrimental impact on the character and amenity of a neighbourhood.

To manage the existing stock of family size homes better, the Council seeks to require the conversion of family accommodation into smaller self-contained dwellings to re-provide at least one family size dwelling. On this basis a threshold of above 130m<sup>2</sup> gross internal floor area (as originally built) has been set as the smallest floorspace allowance that could successfully incorporate two self-contained units respectively. This can consider its potential to extend not yet implemented, or potential extensions which will be consistent with the Councils Residential Design Guide SPD (2010) or its subsequent replacement. A key added advantage of maintaining a stock of smaller

family housing (below 130m<sup>2</sup>) is that this will provide a form of starter units for those on lower income, younger households who experience affordability issues accessing housing in the open market. To mitigate the further erosion of family accommodation the policy requires that a family sized home (of at least 74m<sup>2</sup> gross internal floor area providing 3 bedrooms) is included within any proposed conversion of a house to self-contained flats. The re-provided family sized flat should preferably be on located on the ground floor (or if this is not possible on upper floors), with direct and inclusive access to a rear garden. Further, this policy will also apply to the demolition and redevelopment of larger family dwellings into two flats to ensure there is no net loss in stock of family housing. The housing mix policy will apply to demolition proposals that will result in three (or more) residential dwellings, to ensure an appropriate housing size range is provided and avoid a large number of schemes being permitted with a 3-bed dwelling and 2 or more smaller 1 bed units. This approach is considered consistent with the London Plan (2021) that states *“Where existing houses are redeveloped or subdivided, boroughs may require the provision of family-sized units (3 bed + units) providing sufficient design flexibility is provided to allow the existing footprint of a house to be enlarged in order to meet this requirement”*. (para 4.2.8)

The term ‘as originally built’ refers to the floor area of the property prior to any extensions being carried out. Extensions carried out pre-1948 can be included in the original floor area. Parts of the dwelling that were not originally habitable rooms (for example lofts and cellars) would not be included for the purposes of calculating original floor area.

Nevertheless experience shows that, working within the fabric of buildings designed to provide traditional family housing and (typically) constructed in the inter-war period or earlier, conversion proposals pose challenges in respect of internal layout, external appearance, the resulting relationship with neighbouring property and the potential to adversely impact upon the character of residential areas. Within the context of Policy GR1, which seeks to achieve a high standard of design, layout, privacy and amenity, this conversion policy provides bespoke criteria for conversions to ensure that these challenges are addressed in a manner that results in development with a high quality of design of a standard and residential amenity that is consistent with policy objectives for new build residential development. Further guidance is provided in the Council’s Residential Design Guide supplementary planning document.

Over-intensive conversions of existing dwellings and other residential premises, such as maisonettes above shops, lead to poor living conditions for future occupiers of the development, excessive internal noise transference and external activity for neighbouring occupiers, and frequently to a poor external environment that detracts from the appearance of the property and the character of the area. Appropriate application of design, layout, privacy and amenity considerations to conversion proposals, including the London Plan minimum space standards, Part M of the building regulations (i.e. accessible, adaptable and wheelchair dwellings), will assist in ensuring new homes will provide a satisfactory standard of accommodation that are appropriate within the existing character of the area.

The open, green quality of the suburban environment is part of Harrow’s historical appeal. This has been impacted by hard landscaping to mainly accommodate cars in front gardens and to a lesser extent to manage/store waste, as part of the intensification of existing premises. This has reduced the level of incidental green infrastructure, which has affected the visual quality of the environment, biodiversity

and surface water run-off. Therefore, the design of proposals should seek to increase and enhance the level of soft landscaping on forecourts (including those that are include hard landscaping) and seek to limit the need for hard landscaping areas. This will ensure proposals do not detract the appearance of the property or the street scene, as well as support urban greening and net gains in biodiversity, reduce surface water run-off.

As with new-build residential development, the Council expects conversion proposals to make adequate amenity space provision for future occupiers of the dwellings being created. Amenity space must be useable and functional for future occupiers in terms of layout, size and access to sunlight. Where an existing garden is available, proposals must make this available for all future occupiers of the development, preferably through subdivision to form private amenity spaces for each home and accessible within the site boundary. Where, exceptionally, amenity space is to be provided communally, the Council will wish to be satisfied that there would be adequate privacy safeguards for the ground floor occupiers and that there will be robust, sustainable arrangements in place for managing the on-going maintenance responsibilities.

As part of the subdivision of rear gardens to form private amenity spaces for future occupiers, proposals must make provision for bin storage within those amenity areas and a suitable access for them to be wheeled to the forecourt for collection. Existing and new homes in the Borough are supplied with separate bins for general waste, recycling and composting, which allows the segregation of waste by residents and recycling of it. However conversions increase the number of bins to be accommodated within the curtilage of an existing dwelling, and where left on the forecourt they can be unsightly and cause obstruction. The accommodation of bins within the site therefore requires careful attention as part of design and layout of conversion proposals. The provision of bins within private amenity spaces with suitable access for them to be wheeled to the forecourt for collection, usually offers the best solution in terms of householder responsibility for use, maintenance and waste segregation, and helps to avoid the excessive accumulation of bins on forecourts. Where such storage cannot be achieved (for example, terraced houses) there must be adequate space on the forecourt to accommodate the bins and provide suitable storage (if necessary) and screening in conjunction with other forecourt uses. Applicants should also review the Councils future Waste Strategy and ensure compliance with the requirements of this, particularly in relation to; ensuring waste vehicles can access the property, this area being kept clean and clear.

### **Reasonable Alternatives:**

**Option 1: Continue with the approach of the existing development management policy DM26 (i.e. no locational, minimum size requirements or replacement family-size dwelling requirements).**

The existing policy generally permits proposals for the conversion of houses to multiple flats, provided they are well designed. The advantages of this are; it may increase the delivery of housing and help meet both the London Plan small sites and Local Plan housing target, as well as help demonstrate a five-year land supply of deliverable sites. Further, the potential impact on the character of the Borough is uncertain, as it could potentially spread them across the area or result in impacts being concentrated to a specific area. However to date this has not been identified as a significant problem.



The disadvantages of this approach are; it may result in the continued loss of family housing, which are required to address the future housing needs of the Borough. It is more difficult to re-provide any family housing that is lost via conversions through new development elsewhere than to retain existing family housing, as new residential developments may consist of high-density schemes close to/within town centres/stations. Further disadvantages are it may result in the loss of smaller sized, housing (i.e. below 130 sqm) that are more affordable and may result in the delivery of poorly designed flats. This approach is not considered the preferred option.

**Option 2: Policy should not include a minimum 130m2 size threshold for the conversion/redevelopment of homes into flats.**

The advantages of this are; it may increase the delivery of a higher level of residential units, to help meet housing targets (including small sites) and ensure a five-year land supply of deliverable housing sites.

The disadvantages are; it may result in; a higher level of loss of family homes, specifically smaller, more affordable stock poorly designed homes, if smaller units below 130m2 are converted. It may result in the delivery of a higher level of smaller 1/2 bed flats, even though there is a higher need to deliver family housing of 3 beds or more. It may potentially have a greater negative impact on the character of the area in terms of smaller original homes not being able to accommodate all the ancillary infrastructure (bins / cycle etc). This approach is not considered the preferred option.

**Option 3: Policy should not require the re-provision of a family sized flat with a ground/upper floor area of 74m2 capable of providing a three-bed unit with access to a garden.**

The potential effects of this policy may be similar to option 1. This approach is not considered the preferred option.

**Option 4: Policy should not include any reference to locations with a Public Transport Accessibility Level of 3-6**

The potential advantages of this are; it has the potential of increasing the amount of housing units delivered on, to meet the housing target and demonstrate a deliverable supply of housing sites to meet the five-year land supply.

The potential disadvantages of this are; it may result in the increased loss of family housing (i.e. policy not only apply in PTAL 3-6) and as it may result in conversions in more locations of the Borough. This may have an uncertain impact on the character of the Borough, depending on whether more conversions are implemented within certain locations or not. This approach is not considered the preferred option.

**Option 5: The proposed housing conversions policy should not apply to demolitions of a larger family sized home.**

The points raised for option 2 above apply to this option. Overall, this is likely to result in the net loss of family housing. This approach is not considered the preferred option.

**Option 6: Restrict the application of the conversions policy to certain areas and exclude it from others, via defining the boundaries of these on a map**

The potential positive impacts of this approach are; it could provide clarity for all stakeholders in relation to which areas of the Borough are appropriate for housing conversions to flats; identify, assess the potential adverse impacts and sets out policy measures to address these.

The potential negative impacts of this are; it may be difficult to clearly identify, assess the areas where the conversion policy should apply (or not) and formulating evidence to support this may be a time-consuming exercise. There is a risk that this approach may be contrary to the London Plan Small Sites Policy that supports the incremental intensification of existing residential areas of existing residential areas. This approach is not considered the preferred option.

## Policy HO3: Optimising the use of small housing sites

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter 4 Housing*

### **Policy HO3: Optimising the use of small housing sites**

1. Small housing developments (any site below 0.25 hectares) delivering a net addition of self-contained dwellings through the optimal and efficient use of land, and in accordance with other relevant the Development Plan Policies, will be supported where located in the following areas:

- a. Sites with good public transport accessibility (PTAL 3-6)
- b. Sites within 800m of tube or rail stations
- c. Sites within 800m of a Metropolitan, Major and District Town Centre boundary

2. Any incremental change in character arising from the development of small sites in locations set out under Part 1 should reflect the opportunities identified in the Harrow Characterisation Study and Tall Building (2021) or subsequent versions.

3. Proposals on small sites (including those outside of the locations set out under Part 1) shall: shall :

- a. Demonstrate a character- and design-led approach by setting out how the proposed development considers the existing context, assessing the site and surrounds for the sensitivity to change,
- b. Ensure compliance with the requirements of Policy GR1 in terms of its design and layout, residential amenity and hard/soft landscaping, etc
- e. Protect and enhance biodiversity and green infrastructure, and further maximise opportunities for urban greening;
- d. f. Ensure sufficient parking is provided on site to avoid the risk of harm to safe operation of the surrounding highway network and safety of other road users.
- g. Sites involving residential conversions must be consistent with Policy HO2: Conversion and redevelopment of larger dwellings.

4. Developments that demonstrably fail to optimise potential housing delivery on a site or prejudice more comprehensive development, particularly that of a site allocation, will be refused.

5. The Council will monitor the effectiveness this policy through the Annual Monitoring Report. Contingency measures may be undertaken (if necessary). to address any under delivery during the plan period or through a future review of the Local Plan

### **Supporting Text:**

The London Plan (Policy H2: Small Sites) sets a strategic priority to increase the rate of housing delivery from small sites (below 0.25ha in size), particularly within outer

London. For Harrow it sets small sites target of delivering 3750 additional homes (or 375 units per annum) over a ten year (2019/20 – 2028/29), which is a component of the overall housing target. This figure comprises circa 47% of the London Plan ten-year housing delivery target of 8020 for Harrow. The London Plan and NPPF (2021), require Local Plans to include measures to boost the supply of housing on small and medium sized sites to diversify the sources of housing supply and increase the delivery of housing to address local needs.

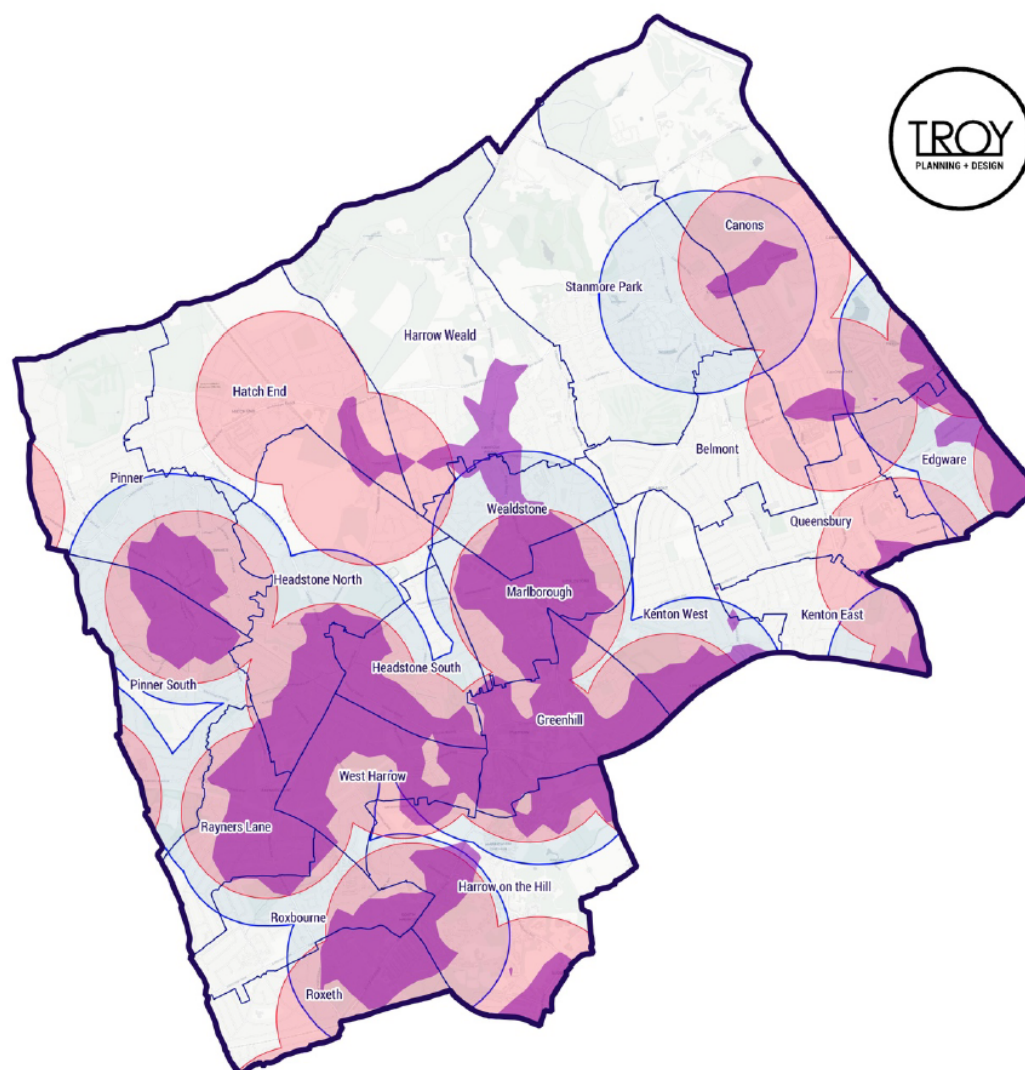
The London Plan expects the incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station (tube or rail) or town centre boundary<sup>7</sup>, to play an important role in contributing towards the housing targets for small sites. Within these geographical areas incremental intensification is facilitated by Policy H2, providing a design and character led approach is taken, in line with the criteria above, to deliver additional high-quality homes. Proposals outside of these locations are less likely to be considered as sustainable and have more potential to cause harm within such locations. However, proposals may still be found acceptable provided they are sensitively designed to protect, enhance and reflect the character of the area and result in no unacceptable impact(s) identified when assessed criteria above and against other policies in this Plan. Specifically, care must be taken to protect the often much lower density suburban form and potential impact to carparking provision required for a site or the wider highway network.

This type of intensification can take a number of forms (as identified in the supporting text to Policy H2), such as: new build, infill development, conversions, redevelopment or extension of existing buildings, including non-residential buildings and residential garages, where this results in net additional housing provision. Proposals will need demonstrate consideration of Policy GR10: Infill and Backland sites, back gardens and amenity areas and ensure compliance with requirements of this. Specifically in relation to residential conversion, policy HO2 Conversion and redevelopment of larger dwellings will apply, which is an approach considered consistent with para 4.2.8 of the London Plan (2021). A map of the locations that meet the criteria of the small sites policy are shown in the diagram<sup>8</sup> below.





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<sup>7</sup> Metropolitan, Major and district centres

<sup>8</sup> NB: This diagram is based on the old ward boundaries and will be showing the new boundaries in the future Draft Local Plan



**KEY**

-  LB Harrow Ward Boundaries
-  PTAL 3-6
-  Areas within 800m of a Railway Station
-  Areas within 800m of a Town Centre

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The supply of new homes from large and medium sites can fluctuate and increase in some years due to longer lead in and built out rates, associated with gaining planning permission and completing more complex strategic sites. This policy seeks to encourage the development of small sites, to provide a range of sized housing sites in different locations, diversify the sources of housing supply and ensure a steadier supply of housing of sites to address local needs, as well as maintain a five-year supply of deliverable sites. It also seeks to facilitate a wider range of development companies active within Harrow so that development is not contingent on a small number of larger companies progressing a limited number of small sites.

The London Plan expects this Plan to recognise that local character evolves over time. Small sites provide the opportunity for communities to grow organically while maintaining their original character or evolving it incrementally based on a consensual approach. The Harrow Characterisation and Tall building Study (2021) has assessed the potential for growth across the borough, considering the sensitivity to change, to understand the potential development capacity of individual character areas across the borough to both tall and mid-rise buildings and small sites. This provides design guidance for small site developments concerning the context, massing, materials, heritage, frontage, and detailing. This is alongside specific design guidance for each character area, which sets out the relevant strategy, an analysis of existing features and where there are opportunities to improve character. Whilst each individual proposal will be assessed on its merits, the study provides a framework for understanding the character of the borough and its capacity for change.

The open, green quality of the suburban environment was part of Harrow's historical appeal. Over time, intensification of building coverage and hard landscaping, principally to accommodate cars, has reduced incidental green infrastructure. This has not only affected the visual quality of the environment, but has also biodiversity, urban temperatures, air quality, and the volume and speed of surface water run-off, together with water quality. Small site development without some form of safeguards could well intensify these matters. Therefore, the design of proposals should consider urban greening to protect and enhance biodiversity, in line with Policy GI3

Proposals should seek to optimise the housing output on small sites, to address local needs, whilst ensuring compliance with other development plan policies relating to high quality design, the protection and enhancement of the local character, minimising any potential amenity impacts on the surrounding area, etc. Further, proposals should ensure the design, layout of their site does not prejudice the comprehensive delivery of adjacent sites or wider area.

The London Plan (2021) indicates the small site target can be considered as a reliable source of windfall housing sites and can contribute towards anticipated future housing supply towards meeting the Local Plan housing requirement/target, as well as demonstrating a five-year land supply of deliverable housing sites. Whilst the NPPF 2021 (para 71), emphasises this approach should be supported by compelling evidence to demonstrate that a windfall allowance is a reliable source of housing supply.

The Draft Small Sites Capacity Study (2021) indicates an average of 298 homes per annum were delivered on small sites between 2010-19 within the Borough. This study sought to identify potential development sites below 0.25ha, assess their suitability, availability and their potential capacity for providing new housing, to meet the small sites target. The study concluded the small sites identified as suitable may have a potential capacity to provide between 380 (design led capacity work) and 478 (London Plan Density matrix) additional homes per annum.

Strategic Policy 3 set outs the level of housing anticipated from various sources of supply during the plan period, including the small sites windfall allowance (SSWA). A low (300 homes per annum) and high (375 homes per annum) range for the SSWA was applied, to assess whether the housing capacity of all sources of potential sources of supply will meet the proposed housing requirement/target.

This policy presents a new strategic approach to meeting housing need locally. We will monitor progress towards the small site housing target through the Annual Monitoring Report and consider this policy's effectiveness through the Local Plan review process. Monitoring will also provide the Council with information to understand the spatial distribution of new small housing development and consider whether interventions are necessary. For example, to ensure those areas where this type of development is concentrated are appropriately supported by community facilities and other strategic infrastructure.

**Reasonable Alternatives:**

**No alternative approach due to requirements of NPPF/London Plan**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy HO4: Genuinely Affordable housing

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter 4 Housing*

### **Policy HO4: Genuinely Affordable housing**

#### **A. Targets**

1. Affordable housing will be required to be delivered on site (except for LSPBSL), to promote mixed and inclusive communities, unless exceptional circumstances can be demonstrated (refer to (E) below).
2. Proposals for major residential and mixed-use development (10 units or more) must demonstrate they have sought to optimise the housing output on a site and apply the threshold approach included within Policy H5 of the London Plan, to increase the delivery of genuinely affordable housing, as well as demonstrate all options have been explored to achieve the Boroughwide target of 50% affordable housing, based on habitable rooms or floor space. Subject to the threshold approach, public sector land, Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites, will all be required to deliver at least 50 per cent affordable housing on each site.
3. The following will be considered when assessing the maximum level of genuinely affordable housing that could be delivered:
  - a. Their contribution to the Borough's strategic affordable housing target, subject to viability and application of the threshold approach.
  - b. The need to make the most efficient use of land to facilitate and optimise the delivery of affordable housing.
  - c. The proposed tenure mix of the scheme and the need to prioritise the delivery of social rented and affordable family housing, in line with the table below.
4. Development proposals will carry greater planning benefit, where they demonstrably deliver the maximum viable amount of genuinely affordable housing whilst meeting the minimum threshold level of affordable housing without public subsidy, (Policy H5 of the London Plan),
5. Applicants will then be expected to make all reasonable efforts to secure grant funding to deliver an increase in affordable housing beyond the level that would otherwise be achievable. The Council will work positively with development industry partners to help identify opportunities to secure grant funding to deliver more genuinely affordable housing in Harrow.
6. The affordable housing requirements for major developments will apply in circumstances where development has already been permitted (or is under construction) and 10 or more dwelling units will be delivered taking into account of the following:
  - a. New residential units that are proposed which would result in an uplift in the overall number of units on the site;
  - b. Development that is proposed on an adjacent site which by virtue of its layout, design and use is functionally related to the extant permission



and would result in an uplift in the overall number of units across the sites; and

- c. Exception to the above applies, if the applicant demonstrates ownership has changed and no relations with the original landowner/developer.

#### **B. Tenure mix (see tenure products definitions in Appendix YY)**

7. Major residential development will be required to provide a tenure split of 70 per cent low cost rented homes (social rent or as per London Plan Policy H6) and 30 per cent intermediate product homes (London Living Rent or shared ownership), in line with the Local Housing Needs Assessment (or any subsequent updated evidence). The intermediate products should meet the definition of genuinely affordable housing. These must be for households within the most up to date income caps identified in the range for different local income brackets/dwellings within the London Plan Annual Monitoring Report.

Table XXY: Identified needs by affordable housing tenure

<b>Tenure of housing</b>	<b>% required</b>
Low cost rented (Social rented or as per London Plan)	70%
Intermediate: Affordable home ownership and / or London Living Rent	30%
Total	100%

8. The Council will prioritise the delivery of social rented housing over other affordable housing products as these are most appropriate to address local needs, when negotiating the tenure mix of schemes. The factors below will be considered, when assessing an appropriate tenure mix:
  - a. The need to prioritise the delivery of a higher proportion of social rented housing in the mix of affordable housing;
  - b. Evidence to demonstrate that the proposed tenure mix will deliver mixed inclusive communities within the locality;
  - c. Compliance with the requirements of Policy HO1: Dwelling size mix. Proposals should ensure they meet the full range of housing needs, particularly those of low-income households who require family housing;
  - d. Evidence of meaningful discussions with Registered Providers which have informed a different tenure, size of units and design to address local priorities and explored funding opportunities and informed the capital value of the affordable housing; and
  - e. Evidence to demonstrate a different tenure mix will lead to a higher quantity of affordable housing and provide products that are genuinely affordable for a range of household incomes to address local needs.
9. The affordable housing provision within Build to Rent developments will be expected to be 100 per cent at Discounted Market Rents at an equivalent rent to London Living Rent or lower. The applicant will need to demonstrate the rents are set at a genuinely affordable rent levels and

allocated to those on the waiting list in accordance with a local eligibility criteria.

10. The affordable housing Community-led housing scheme products within community-led housing schemes, may be provided in a different tenure (via prior discussions with the Council), providing it is genuinely affordable and meets identified housing needs.

#### **C. Viability tested route**

11. Site-specific viability information will only be accepted in exceptional cases, determined by the Council. Any proposals where site-specific viability evidence is accepted must provide the maximum amount of affordable housing, informed by detailed viability evidence. This should be based on the methodology and assumptions set out London Plan, and the Affordable Housing and Viability LPG. The cost of any independent review must be covered by the applicant.
12. To maximise affordable housing delivery and address economic uncertainties that may arise over the lifetime of a development proposal, the use of 'review mechanisms' will be required, where appropriate, and implemented; in accordance with the London Plan and any associated guidance.

#### **D. Offsite contributions**

13. To promote inclusive and mixed communities all new affordable housing provision should be delivered on-site. Off-site provision or payment in lieu for major development proposals will only be considered in exceptional circumstances, where it can be demonstrated to the satisfaction of the Council that:
  - a. It is not practical or feasible to provide affordable housing on-site due to site development constraints; and
  - b. where off-site provision is proposed:
    - i. A higher level of affordable housing can be secured through provision on an alternative site;
    - ii. Off-site provision is necessary to better meet priority housing need, such as for affordable family housing; and
    - iii. The provision will better support inclusive and mixed communities.

#### **E. Vacant building Credit**

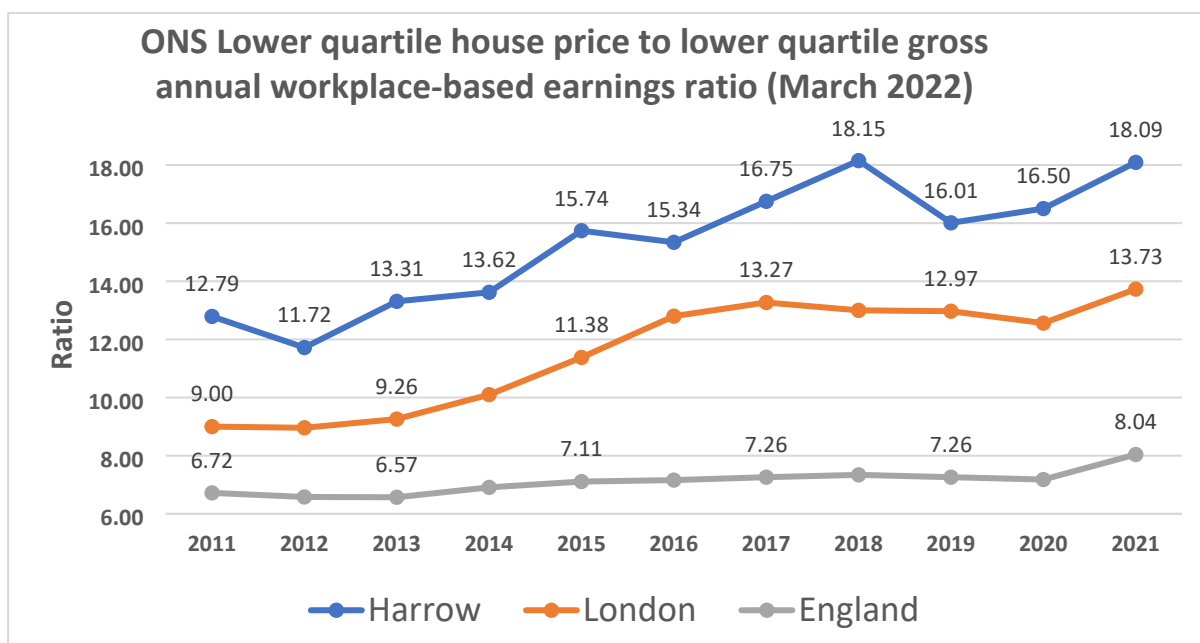
14. The application of the Vacant Building Credit (VBC) is not appropriate in Harrow. The use of VBC will only be considered in limited circumstances, where applicants address the criteria below :
  - a. The building is not in use at the time the application is submitted;
  - b. The building is not covered by an extant or recently expired permission;
  - c. The site is not protected for an alternative land use; and
  - d. The building has not been made vacant for the sole purpose of redevelopment, as demonstrated by evidence showing that the building has been vacant for a minimum continuous period of five years and has been actively marketed for at least two years therein, at realistic local area prices.
15. The affordable housing policy will apply to any net increase in the floor space of the vacant building.

**F. Mixed and inclusive communities.**

- 16. To secure inclusive and mixed neighbourhoods and communities the Council may seek to alter the tenure and/or mix of affordable housing provision on a case-by-case basis. In establishing the most appropriate level of provision for a site, development proposals will be considered having regard to the existing levels of housing tenure and mix in the area (including extant permissions).
- 17. All new affordable housing developments must be of a high-quality design having regard to other Local Plan policies. The design of the units should be 'tenure neutral' in line with the National Design Guide, so that affordable units are indistinguishable from market units in terms of quality of design and materials, space standards, access and amenity. Where mixed tenure schemes are proposed these must ensure all residents of the development have access to amenities and communal spaces including play spaces.

**Supporting Text:**

Similar to the rest of London and England, the housing crisis is having a significant negative social and economic effects on t Harrow resident’s standard of living and wellbeing, particularly for the low-income younger households and families. This is demonstrated by the affordability issues households face to buy and rent suitable housing to adequately address their needs. For example, ONS data indicates lower quartile house prices increased from £230k to £427.5k between 2011 – 21 (86 %) and the annual lower quartile work placed earnings increased from £17,888 - £23,635 (32%) in Harrow. Due to this the lower quartile house prices to annual earnings ratio, which is an important indicator for housing affordability, increased from 12.79 to 18.09 (41%) during this period. This means housing affordability has worsened as lower income groups typically spend 18 times their work based annual earnings on purchasing a home.



In contrast, the lower quartile weekly rents thresholds for; a room increased by 22.5% from £400 to £490, one bedroom home increased by 33% from £750 to £1000, two bedrooms increased by 34% from £930 to £1,250, three bedrooms increased by 29% from £1,200 to £1550, four bedrooms (or more) by 20% from £1500 – £1800 between 2011/12 – 2021/22 (fig 17 , Draft LHNA). Hence, the cost of renting a home is largely unaffordable to lower quartile earning residents, particularly family housing (3b+) within the Borough, without housing benefit, more than on earner or reliance on renting a bedroom within a house or HMO property and availability of affordable housing.

The Draft Local Housing Needs Assessment (LHNA 2022) utilised a model to assess the future number of households who will not be able afford to own *or* rent suitable market housing, the quantity of affordable housing, size, tenure of affordable housing; that may be required to address their needs. This indicates an overall housing need to deliver a total of 7,714 affordable homes (or 386 dwelling per annum) between 2021 – 41, which is equivalent of circa 50% of the future Borough housing requirement/target (16,040). This is made of 6549 (85%) homes for those households who are unable to afford to rent or own market housing and 1164 (15%) homes needed for those who aspire to home ownership but cannot afford it. A further breakdown is provided of the tenure products (6549) that may be required to address the future affordable housing needs. This indicates 66% of affordable housing should be social rented (i.e. 3728 +1386), 2% affordable rented housing (164), 16% London Living Rent (1272) and 15% (1164) low-cost home ownership products. In line with London Plan Policy H6 , this means circa 70% of affordable housing should be low cost rented products (i.e. social rented/ affordable rented products) and the remainder 30% intermediate housing products.

This LHNA includes an analysis of the weekly housing cost of different 1-4 bed affordable housing products. This indicated that the weekly cost of social rented (e.g. 2b = £126 pw) and affordable rented housing (e.g. 2b = £207) was significantly less than First Homes (e.g.2b = £271) and shared ownership (e.g. 2b = £305) products for all sized units. Further, it included an analysis of the potential income required for 1-4 bed affordable housing products. This indicated a lower income was required for socially rented housing (e.g. 2b = less than £36k) and London living rented housing (e.g. 2b = £36k - £68k) than shared ownership (e.g. £68k -£90k) and First Homes (£53-90k) products for all sized units. This demonstrates social rented housing and London Living rented housing is genuinely more affordable based on local incomes and costs, compared to First homes and shared ownership products. Proposals will need to demonstrate that intermediate housing products are genuinely affordable to local residents based on an assessment of lower quartiles/median incomes and cost of owning/renting dwellings in the Borough.

A significant number of homes are needed to meet Harrow's affordable housing needs of the Borough. The needs outweigh the number of genuinely affordable homes within the necessary tenures (predominantly social rent) that can realistically be delivered over the lifetime of the Plan. This is the case when taking into account both the planning enabling and affordable housing provider funding mechanisms available. National policy requires the council to set affordable housing targets that are realistic, particularly in relation to development viability.

London Plan Policy H5 sets a threshold approach to affordable housing provision to remove the need for viability assessment. The affordable target is set and assessed on the basis of the percentage of the development's habitable rooms, or if there is a

disparity between affordable and private room sizes, the habitable floorspace. Policy H6 sets out the Mayor's minimum requirements in terms of tenure for 60% of the affordable housing sought. It then requires borough local plans to provide further detail on what the remaining 40% should comprise. Harrow's needs are predominantly for social rent/ London Affordable Rent levels. These are more difficult to deliver as they require the highest amounts of subsidy, either from the public purse or via cross subsidy from market homes for sale/ rent.

The Council is very supportive of the Mayor's long term 50% affordable housing target and the fast-track approach as set out in policy H5 as a tool towards achieving the 50% on all sites in the longer term. The council recognises that its historic target set out in the previous Local Plan of 40% of all new homes being affordable with a 60% social rent/ 40% intermediate tenure split was challenging to achieve. The Draft London Affordable housing Supplementary Planning Guidance (2023) indicates the Mayor's strong preference is for the delivery of Social Rent homes, which are best placed to address current housing needs and are eligible for grant funding under the London Affordable Homes Programme (AHP) 2021-26. In relation to its local element of the London Plan tenure split over which it has discretion, the Council will seek to maximise the amount of social rented units that can be delivered on site in non-build to rent schemes. The Council will undertake a Local Plan Viability Assessment, to provide an indication of the amount, size, tenure of affordable housing that may be achievable on different scale and types of residential or mixed-use schemes and the locations. It should be noted the actual level of affordable housing contributions from schemes will be determined on a site-by-site basis, by applying the Threshold approach of London Plan Policy H6.

Consistent with London Plan policy H6, any deviation from the minimum affordable percentage of habitable rooms not consistent with the required tenure mix and other policy requirements consistent with the fast-track approach will need to be fully justified through a policy compliant viability assessment.

Where viability impacts are so great that a reduction in percentage of affordable housing that can be achieved on site is below that required for the fast-track approach, the council will seek to pursue the preferred tenure split set out in policy. It views the delivery of more affordable tenures that would meet needs (social rent and London Affordable Rent) as a greater priority than achieving a potentially higher percentage of affordable housing on site that places greater emphasis on intermediate tenures. Some developers nevertheless seek to increase the overall headline affordable homes percentage delivered on their site above the London Plan threshold levels through the provision of more intermediate tenure dwellings. In these cases, the council will seek a scheme which greater prioritises genuinely affordable rents, even if this results in the overall headline percentage of affordable justifiably reducing.

London Plan Policy H11 sets out a requirement for 30% of the affordable dwellings within a build to rent scheme to be at London Living Rent levels. The other 70% is for boroughs to identify, taking account of needs and viability. The Council will seek to achieve 100% London Living Rent equivalents, or lower. Similar to affordable housing delivered from qualifying mainstream housing developments, it will prioritise affordable housing that meets priority needs (cheaper forms of rent) where the fast-track approach is not being pursued. For schemes where affordable is below threshold levels it will as a minimum seek 70% of the affordable provided as London Living Rent

equivalent. The Local Plan Viability Study will be undertaken to assess the achievability of this approach.

In relation to intermediate housing tenures, the Council would welcome affordable solutions, such as community led housing or self-build/custom build housing, which can offer a genuine alternative mechanism for delivering new affordable homes. Where these types of solutions however potentially undermine the delivery of its preferred tenure mix, it should not automatically be assumed that this will be acceptable. Promoters of such schemes should seek to engage early on with the Council.

In accordance with national policy and London Plan Policy H4, on major residential developments affordable housing should be provided on site, as part of the emphasis on creating mixed and balanced communities. Nevertheless, it might be that in exceptional circumstances financial contributions in lieu of provision of affordable housing on site will be acceptable. More detail on when contributions in lieu of on-site provision will be acceptable and how they are calculated is set out in the Mayor's Housing SPG. The acceptability of contributions in lieu will be determined on a case-by-case basis in early discussion with the Council.

### **Reasonable Alternatives:**

**Option 1: To put a greater emphasis on intermediate products.** The current split seeks to meet priority affordable needs as identified in the Draft Local Housing Needs Assessment (LHNA), but also allow for mixed communities by encouraging the provision of some intermediate products. The LHNA shows that intermediate products are essentially the least affordable of all the tenures to address the housing needs of local residents. Intermediate products are more likely to be occupied by people who have a choice within the market for alternative accommodation, e.g. market rent. Given the number of people who are homeless/ in temporary accommodation, living in overcrowded housing, an increase in intermediate proportions is not considered the preferred option.

## Policy HO5: Housing estate renewal and regeneration

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter 4 Housing*

### **Policy HO5: Housing estate renewal and regeneration**

1. Development proposals involving the renewal and regeneration of the Borough's Housing Estates, including any enabling market housing, must be carried out in consultation with existing residents, the local community and other relevant key stakeholders, in line with the London Mayor's Good Practice Guide to Estate Regeneration. Proposals must ensure;

A. There is no net loss of affordable housing floorspace, and

a). replaces like for like tenure and size; or

b). meets the needs of returning residents (subject to a decant strategy); or

c). complies with the Council's latest housing needs assessment; and

d). where developments seek to introduce market sale housing to enable the estate regeneration, any further uplift in genuinely affordable housing provision should be made. This should be delivered in accordance with Policy HO4: Genuinely Affordable Housing and Policy H5: Threshold Approach of the London Plan

B. Any affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social rent housing is not facilitating a right of return, it may be provided as low cost rented homes (social rent or as per London Plan Policy H6).

C. The tenure of additional affordable housing (other than the replacement provision) should comply with Policy HO4: Genuinely: Affordable housing; prioritising the need to deliver additional social rented housing.

D. The size of both market and affordable accommodation provided through estate regeneration schemes should be based on the particular needs of both the existing, and prospective future residents. It must consider the requirements of Policy HO1: Dwelling size mix that prioritises the delivery of additional family sized housing.

E. All affordable housing products are integrated into the development to ensure mixed, balanced and inclusive communities.

F. Ensure a design led approach is undertaken; to achieve the most optimal and efficient use of land.

G. A satisfactory quantum of accessible hard and soft landscaping is provided in line with other policies within the Development Plan.

H. Where a net loss of external amenity space is proposed, on a case by basis, consideration will be given in relation to;

a) The existing quantum/quality of external amenity space

b) Proposed quantum/quality of external amenity space

c) Other planning benefits arising as a result of the loss of external amenity space

I. A sufficient level of play and informal recreation space is provided in line with the approach set out in London Plan policy S4 and Local Plan policies

- J. Estate regeneration schemes increase permeability and integration into the existing urban built form; improve safety and access for walking, cycling and public transport use to local amenities for residents; improve the public realm within the estate; and create new walking and cycling routes through estates as appropriate.
- K. Spaces and facilities are provided to enhance opportunities for social interaction, integration to support strong and inclusive communities that encourage physical activity and healthy living
- L. Compliance with parking standards set out in Policy M2 should apply, unless exceptional local circumstances are demonstrated
2. Proposals for estate renewal, regeneration schemes should be supported by a statement setting out its overall social, economic, environmental, health benefits.
  3. Estate regeneration proposals should form comprehensive development schemes, rather than piecemeal proposals. Where only part of an estate is brought forward, it must form part of a wider masterplan.
  - 4.. The Council will consider the use of Compulsory Purchase Order powers to facilitate the delivery of a comprehensive regeneration scheme, where appropriate.
  5. The Council will support proposals for Estate Renewal and Regeneration that demonstrate compliance with above requirements and Policy SP03, including those relating to undertaking a master plan led approach, identifying and addressing location specific issues, and bringing forward a comprehensive scheme.

### **Supporting Text:**

The Council is committed to ensuring all of Harrow's residents have access to a decent home that is secure and affordable. This will require that significantly more new genuinely affordable housing is made available in the Borough.. In addition, it is vital for the safety and security of residents and the wider community that homes are well integrated into their neighbourhoods, with plentiful opportunities for social interaction, and that high quality living environments benefit the health and well-being of local residents.

Harrow's council homes were mainly built between 1950 and 1970, as the area was a focus of efforts to tackle shortages of good quality housing following the Second World War, and are concentrated in the Harrow Weald, Roxbourne, Pinner and Stanmore Park wards. There are numerous social housing estates across the Borough. This includes the larger estates at Grange Farm, Mill farm, Rayners Lane and the smaller estates at Woodlands, Cottessmore (Stanmore Park Ward), Headstone and Headstone Lane (Hatch End), Vaughan Road/Butler Avenue and the Honeybun (West Harrow ward), Northolt Road Estates (Harrow on the Hill ward) and Pinner Hill.

In line with the previous Core Strategy, the comprehensive renewal and regeneration schemes for Mill farm and Rayners Lane estates has been completed. Whilst the permitted scheme to encourage the regeneration, renewal of the Grange Farm estate is currently being implemented. Grange Farm estate is approximately 4.1ha and consisted of varied housing across the site. However, the predominant housing on site was a known as Restiform housing, which built in the 1990s as temporary



accommodation. The building construction typology was of poor quality and was only intended to have a lifespan of 30 years. Through the passage of time, the homes on the site had deteriorated and were extremely inefficient and not fit for purpose. The remainder of the site comprised of a poorly utilised community centre and the designated open space was of poor quality and not used effectively or efficiently.

The Council have commenced the regeneration of the Grange Farm Estate. A hybrid planning application was granted planning permission in 2018, which resulted in approximately 574 new homes being approved on the site, and importantly, affordable homes for the borough including re-providing homes for existing residents of the estate. Works are underway on site currently, with 89 affordable homes in phase 1 being delivered.

Phases 2 and 3 will follow and will deliver more housing including affordable homes. All new homes will meet current guidance and requirements in terms of internal space standards, accessibility and energy efficiency. Along with the delivery of new housing on the site a new, larger, fit for purpose community centre will also be provided, set within a much higher quality open space for the benefit of residents and the wider community.

The indices of Multiple Deprivation (2019), indicate there is high levels of deprivation within the Borough estates, particularly Stanmore Park ward that covers the areas of Woodlands and Cottesmore Estates; followed by the Hatch End Ward that covers the Headstone and Headstone Lane Estates. This is related to factors; such as poor standard of housing (i.e. lack central heating or housing that fails to meet decent homes standards relating health, safety), barriers to accessing housing (i.e. affordability), and services (geographic barriers/physical proximity, overcrowded housing, low incomes effecting children and older people; low levels of employment, health issues (physical/mental) of residents; lack of education attainment/skills,. Other key issues that all or some of the estates may be experiencing are;

- the housing stock has reached the end of its life and is physically decaying
- families are residing within overcrowded housing
- the stock of social housing is being lost via the Government's right to buy scheme, whilst the opportunities to replenish it are limited in contrast to increasing needs for genuinely affordable housing.
- Some of housing stock does not meet decent homes standards,
- The housing stock has poor energy efficiency resulting in higher energy bill and "fuel stress"
- Some of the estate housing stock may be unsuitable for residents with physical disabilities, older residents and wheelchair users
- The estates suffer from poor quality external space and urban planning such large areas of hard standing areas with no natural surveillance , raising safety concerns. There are areas of left over space between development that are an inefficient use of land
- Lack of /fragmented designated and non-designated open space that is poorly used, accessed and maintained.

- Presence of garage courts that are no longer used for their original purpose
- Large areas of hard standing for car parking that are inefficiently used
- Lack of or poor access to community facilities and other facilities (i.e. health) that are important for the wellbeing of residents and supporting healthy, sustainable communities
- Lack of or poor access to public transport (such as buses) serving estates, even though lower income groups are highly dependent on it due to a lack of alternative

The conditions of housing estates and challenges they face varies and the programme required for these will differ. Some of the older estates may have physical constraints that may limit site or area wide enhancements. For example, their layout, design may make it difficult to introduce new access points and through routes, provide more usable open space. Also fragmented/multiple land ownership may be an issue for bringing sites forward. In other circumstances, options may arise to deliver more affordable housing units on estates, either through incremental infill or comprehensive redevelopment. Accordingly, strategic approaches to estate renewal and regeneration may be necessary in certain circumstances.

All development proposals for estate renewal and regeneration must ensure that there is no net loss of affordable housing floorspace, in accordance with other Development Plan policies. Loss of existing affordable housing will only be permitted where it is replaced by equivalent or better-quality accommodation, providing at least an equivalent level of affordable housing floorspace, on an identical or equivalent basis<sup>9</sup>. The use of floorspace (i.e. based on habitable rooms) as the measure for replacement provision provides flexibility for the Council and its partners to better address acute housing needs, such as for more family sized social housing, where redevelopment is undertaken. To achieve no net loss, higher density, including the introduction of market housing may be necessary to increase the viability of schemes and achieve a more mixed and balanced community. This approach is consistent with the London Plan.

Replacement and additional affordable housing should reflect the housing needs of existing and future tenants of the estate, as well as consider the requirements of Policy HO1: Dwelling size mix that prioritise the delivery of additional family sized housing. Schemes should make provision to re-house existing residents, after which the mix of all additional units should reflect the wider housing needs of the borough in all but exceptional cases where a variation can be robustly justified. Existing residents should be rehoused in advance of occupation of new market housing.

Proposals for the renewal and regeneration of the Borough's estates should provide satisfactory levels of hard and landscaping areas within appropriate locations of the scheme. These should comply with other policies relating to satisfactory provision of external amenity/open space, walking, cycling and parking, as well as include

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<sup>9</sup> Affordable housing floorspace must be replaced on an identical basis where a tenant has a right to return. Where there is no right of return affordable housing must be replaced on an identical or equivalent basis, i.e. social rented floorspace may be replaced with social rented floorspace or by general needs rented accommodation with rents at levels based on that which has been lost.

measures to reduce surface water run off issues (via SUDS) and support urban greening and net gains in biodiversity .

The Development Plan sets out the quantity and quality of open space (amenity space) that is required to ensure these are accessible and address the future needs of the Borough. However, it may not be always possible to apply these standards, as there is a deficiency in accessible open space provision in certain parts of the Borough. Many of the Borough's estates include designated open space and any proposals for the renewal and regeneration of these should seek to ensure there is no net loss in open space provision, for which there is a presumption against within this Local Plan.

To justify the potential net loss of open space provision, in exceptional cases, applicants would need to submit a robust assessment of the existing quantity, quality of open space provision in contrast to the proposed provision and the rationale for the proposed net loss of open space, including other overriding planning benefits of the proposal. This should set out an understanding of the function, quality, benefits, and disadvantages of the existing provision, as well as options that were taken to limit any quantitative loss and why these were not appropriate. Any quantitative loss of open space, should result in the delivery of a higher quality open space provision with a range of recreational facilities for children, as well as suitable measures for landscaping and urban greening to support biodiversity

Proposals regeneration, renewal of estate should be bought forward via a master plan led approach covering all of the estate and should be developed in partnership with other stakeholders including other landowners. This will ensure a comprehensive redevelopment proposal comes forward for the estate, rather than piece meal redevelopment. This should investigate, in partnership and effective consultation with other stakeholders (including residents), the considerations below ;

- the physical, social, environmental, economic issues facing it, including health, equality issues facing residents, opportunities for addressing these,
- The needs/aspirations of existing/future residents in relation to the type, size, tenure of future housing; the level type of social infrastructure (including private/communal amenity spaces, community facilities, leisure and recreational facilities, parking)
- The assessment of the physical, environmental, heritage and other development constraints and appropriate measures to address these
- Sustainable transport measures including the improvement of pedestrian links, cycle paths, public transport initiatives within the site and linking to surrounding areas
- Measures to promote active lifestyles and healthy living
- Satisfactory access, layout, massing of blocks and design of the schemes
- Appropriate levels of hard/soft landscaping, urban greening to achieve a net gain in biodiversity
- Measures to promote the efficient use of resources, minimise energy usage and explore options for the use of low carbon or renewable energy sources

It should be noted the above list of consideration is not an exhaustive list, as these are likely to vary between different estates and other issues may emerge when proposals come forward or via consultation processes. The Council recognises that proposals permitted for the renewal, regeneration of the estates may need to be implemented in phases in line with its masterplan, whilst seeking to minimise any harmful amenity impacts and inconveniences to existing residents still residing in the estates. Applicants will be required to submit a Decant Strategy that demonstrates; the necessity of moving existing residents to alternative temporary/permanent accommodation, the process is fair and efficient, adequately considers the needs of households (e.g. access to schools, health issues) in order to facilitate the regeneration and redevelopment of all/parts of the estate. It will also be necessary to include measures to minimise any disruptions to the lives of existing residents during construction and the need for relocating them, after they have settled in accommodation within a given location. This should be based on discussions with the relevant Council teams such as housing, adult and social care and education, as well as comply with any relevant regulatory requirements and established good practices.

National Policy requires planning decisions to consider the social, economic and environmental benefits of estate regeneration. In Harrow's view, health benefits are equally important to address the objectives of sustainable development. Applicants for estate regeneration schemes should set out in a supporting statement the overall social, health, economic, environmental benefits of their proposal to enable consideration of these in the decision-making process and promote sustainable development.

During the Plan period, the Council will monitor the issues, challenges facing the Borough's Estates and those who reside within them, as well as potential public funding for estate renewal, regeneration and proposals that come forward via planning processes. Based on this, the Council may decide whether any direct intervention such as the use of Compulsory Purchase Powers is required (if appropriate), or indirectly with Registered Social landlords, site owners, to implement a comprehensive regeneration, renewal or maintenance scheme for the Boroughs estates, either via Planning processes or other mechanisms.

### **Reasonable Alternatives:**

#### **Option 1: Alternative approach would be no policy**

The NPPF / London Plan is silent on the some or all of the matters covered by the proposed Local Plan policy, meaning there would be limited guidance to determine planning applications against, impacting upon the effectiveness of the Plan. This approach is not considered the preferred option.

#### **Option 2: Require proposals to re-provide of external open space (amenity space) at an equivalent quantity of the original space (i.e. no net loss).**

There is a deficiency in accessible open space (external amenity space) within certain parts of the Borough. Many of the Borough estates include designated open space and proposals should seek to ensure, there is no net loss in existing open space provision and where possible seek to meet any standards in relation to the quantity and quantity of provisions. But the potential policy option of ensuring no net loss in existing open space provision (i.e. no flexibility based on compliance with a criteria) may have adverse impact on the delivery of a higher quality provision, with a range of

recreational facilities and the delivery of other planning benefits (e.g. addressing priority housing needs, community needs), as well as may have some impact on the design quality of the scheme and in rare instances the potential deliverability of schemes (e.g. lower housing output). Due to these factors, option 2 was not considered the preferred option.

## Policy HO6: Accommodation for older people

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter 4 Housing*

### **Policy HO6: Accommodation for older people**

1. Proposals for specialist C3 and non-C3 older peoples residential accommodation such as care homes and extra care facilities will only be suitable where:
  - a) It is demonstrated they would meet an identified local need, particularly to enable older people to live independently
  - b) It would deliver specialist older people accommodation that would contribute to meeting the Local Plan strategic target for specialist older person accommodation
  - c) Affordable housing is provided in line with Policy HO5
  - d) it has adequately considered and addressed all design issues in Part 3 or Part 4 to ensure the accommodation is suitable for the intended occupiers;
  - e) it provides the necessary level of supervision, management and care/support for the intended occupants, which will be secured in a legal agreement;
  - f) it is easily accessible to public transport (PTAL 3-6), shops, services, community facilities (including health) appropriate to the needs of the intended occupiers
  - g) it contributes to mixed and balanced communities.
  - h) Proposals consider and respond positively to the objectives, priorities of the Councils housing and commissioning strategies
  
2. Extra care proposals will be usually classed as a C3 use. Such proposals must demonstrate that the following design issues have been considered and addressed to ensure the accommodation is suitable for the intended occupiers:
  - a) The proposal is for provision of self-contained units which address requirements for private internal space;
  - b) There should be an appropriate balance between private residential accommodation and communal space for ancillary uses to the primary use of the site.
  - c) Good quality guest and/or staff accommodation (where appropriate) is provided in line with minimum space standards, with sufficient storage space and facilities for visitors and staff;
  - d) There is appropriate privacy of internal spaces in the building for relevant groups, namely residents and any staff accommodation/rooms;
  - e) Appropriate bathrooms, kitchen/laundry facilities and appropriate rooms for activities/therapy/community use are provided;
  - f) Appropriate wheelchair accessibility is provided. At least 10 per cent of dwellings meet Building Regulation requirement to 'Wheelchair Adaptable Category M4(3)(2)(a)' standard or, where Harrow Council are responsible for allocating or nominating a person to live in that dwelling, Wheelchair Accessible Category M4(3)(2)(b) as set out in the Approved Document M of the Building Regulations. All other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'

- g) Proposals make provisions for a sufficient level, type of private, communal and public amenity spaces and facilities.
  - h) The layout and design of communal spaces/facilities should be designed to encourage incidental meeting, interaction and to develop a sense of community
  - i) Demonstrate how the range of type of units and their design will address the needs of people with dementia and other long-term health conditions, and be informed by discussions with providers and demonstrate accordance with the Council's commissioning and housing strategies
  - j) Adequate access, parking and servicing access arrangements are demonstrated, with a safe drop off point within 50m of the main entrance in line with policy M2. This must be appropriate for emergency vehicles
  - k) Provision of suitable charging points for mobility scooters is included on-site – with a minimum standard of secure scooter storage and charging facilities equivalent to 25% of dwellings<sup>10</sup>
3. Care homes must demonstrate the following design issues have been considered and addressed to ensure the accommodation is suitable for the intended occupiers:
- a) There is an appropriate balance of private residential space and ancillary space associated with the care required for the use
  - b) There is appropriate privacy of internal spaces in the building for relevant groups, namely residents and staff;
  - c) 100% of all habitable rooms are wheelchair accessible;
  - d) Accommodation is provided in line with relevant design guidance and best practice standards; such as set out by the Care Quality Commission;
  - e) Adequate access, parking and servicing access arrangements are demonstrated, with a safe drop off within 50m of the main entrance. This must be appropriate for ambulance/mini bus drop-off;
  - f) Provision of accessible communal outdoor space for use by residents, staff and visitors which is well designed – in terms of its function, layout within development proposals – to ensure a good level of amenity with regard to daylight and sunlight, noise, enclosure, overlooking, privacy and security.
  - g) Adequate level and range of care facilities and support, communal areas/facilities (i.e. dining areas, lounging area, kitchen meal preparation) offered to address the individuals needs of residents on site
4. The Council will resist development proposals which involves the loss of floorspace in specialist older peoples and care home accommodation unless:
- a) It can robustly demonstrate that there is a surplus over a long-term of this housing type in Harrow.; or
  - b) adequate replacement on-site accommodation will be provided that satisfies Part 3 or Part 4 or
  - c) adequate replacement accommodation is provided elsewhere in the borough that satisfies Part 3 or Part 4; or
  - d) It can be demonstrated the existing accommodation is unsatisfactory for modern standards or cannot be adopted to meet these to re-provide the use and/or is not fit purpose

<sup>10</sup> [Accessible design features in specialist older persons housing \(london.gov.uk\)](https://www.london.gov.uk/development-planning/policies/accessible-design-features-in-specialist-older-persons-housing)

**Supporting Text:**

Harrow is expected to experience an ageing population with a significant growth in the older population during the Plan period. The Draft Local Housing Needs Assessment (2022) indicates that households aged 65 + plus are expected to increase by 28% and households aged 75+ are expected by 64% between 2021-41 (table 8). Whilst the ONS 2018 households' projections indicate that the Boroughs, 65+ household population is expected to increase by 21% and 75+ household population 25% between 2022-23. However, it should be emphasised the growth in the older population will not necessarily increase the need for accommodation that is suitable for older people, as most older people will most likely continue to remain within their house throughout their lives, whilst others may down/right size and it common cultural practice for multigeneration households to reside and care for one another in a single dwelling, particularly amongst the ethnic minority groups that form a large part of the Borough population. The Plan seeks to ensure a wide range of high quality and affordable housing options are available to older people. This includes accommodation for those seeking to remain in their homes, downsize from larger homes whilst remaining in the area, or people requiring more tailored, specialist accommodation with elements of support or care.

Local needs for older persons accommodation should be met principally through conventional housing. Where this is a good level of this type of provision available in the Borough there will be less reliance on specialist forms of accommodation (with varying levels of care). All new residential development in the C3 Use Class must therefore be designed to be adaptable to the varying needs of users at all stages of life, in accordance with Local Plan policies The Council will also encourage the retrofitting of existing residential buildings and units to better suit the day-today needs of older people, including by making them wheelchair adaptable or accessible. All proposals for retrofitting (via internal external alterations) must ensure compliance with other Local Plan policies such as those that relate to the protection of the historic environment, heritage assets and character of an area.

Specialist older person housing is a term used to describe a range of types of housing (i.e. use class C3) that suit and meet the needs of older people and does not apply to residential and nursing care homes. This provides housing that enables an older person to live independently in their self-contained living space, with communal facilities and varying levels of support (if needed). This can include age restricted housing for people aged 55 years or above, such as key products like retirement living or sheltered housing for older people aged 60 and above (usually with on-site support and some communal facilities), extra care housing (with on-site care services) and care villages or continuing care retirement communities (with higher levels of care). it should be noted the market for older people accommodation is diverse and evolving and other products may fall within the definition of specialist housing<sup>11</sup>. The benefits of specialist housing are; they enable older people to live independently for longer, with positive health and wellbeing outcomes, whilst allowing access to care staff (if needed). They can result in savings for the NHS (i.e. reduce admissions and long stays) and adult social care, prevent/delay more costly moves into care homes;

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<sup>11</sup> <sup>11</sup> See Appendix X: glossary for a definition of the different types of older people accommodation.



provide dementia-friendly accommodation; free up under-occupied homes (often with gardens) to meet the needs for family sized housing.

Further, residential or nursing care homes address the accommodation needs (i.e. use class C2), usually of those who are aged 75+ or have serious health issues or needs that requires specialist care staff or professional nursing staff. These are non-self-contained accommodation, comprising of a residential setting where a number of older people live, usually in single rooms, and have access to on-site care services and other facilities.

The London Plan (2021) Policy H13 sets the Borough an annual benchmark target to provide 165 units per annum (or total of 1980) of accommodation for older people between 2017-29 (12 years). This equivalent of 2300 units older people units over a 15-year period and 3,300 units over 20 years (2021-41). However, the Draft Local Housing Needs Assessment (LHNA) indicates this benchmark figure does not take account of the anticipated lower rate of forecasted increase in the older population, after 2029 and may have been overstated the level of need. The Council will monitor need, supply, pipeline of older people accommodation during the Plan period, and will consider updating the evidence (if necessary).

The Council commissioned Housing Learning Improvement Network (LIN) to undertake an assessment (2022) of the future need, for housing and supported accommodation for older people and adults who have care/support needs, including those eligible for care from Harrow Council adult social care, covering a period between 2022 -32. The aim of this was to inform the Councils future housing planning, investment and delivery programmes. This indicates a total need to provide 980 units of specialist accommodation for older people between 2022-32 (10 years), comprising of circa 660 units of retirement housing; 320 units of extra care housing. In addition, it noted 30 bed spaces for residential care and 200 bed spaces for nursing care are required to address local needs. Therefore, a large proportion of housing needs of older people would be addressed via the delivery of a higher level of specialist older people housing such as extra care, retirement housing and there is small need to deliver nursing care homes and limited/no need for care homes.

The Councils Housing Strategy (2019) seeks to move away from the traditional model of providing care homes (with support staff) toward providing specialist older people housing with an appropriate level of support and ensuring existing/new stock of housing meets accessible and adaptable standards, to enable older people to remain independent within their accommodation. More general levels of accessibility in the wider public realm are also an issue and can also help enable people to remain in their homes for longer; policies which make streets more liveable can help to remedy this. The strategy indicates the overarching need is for affordable extra care housing for rent. It also seeks to increase the supply of extra care housing for older people in Harrow with frailty, mild to moderate dementia, physical disabilities and mild learning disabilities who can continue to live independently with appropriate support in place as an alternative to residential care. Further, it recognises a need to develop specialist housing solutions for people with dementia, through an approach that integrates housing, adult social care and health.

The Council's Adult Social Care Services Team have produced a Market Position Statement<sup>12</sup>. This sets out the Council's current commissioning approach and market opportunities for providers. It sets out the current understanding of social care needs, forecasts and demand projections. Further, it sets out Adult Social Care's commissioning intentions for Housing, including Extra Care and Supported Living, as well as areas such as Older People, People with Dementia, Learning Disabilities and Autism, Equipment Services and Assistive Technology etc. This will be updated, when necessary throughout the Plan period.

Applicant will be required to demonstrate how their proposal has considered the findings of the above evidence-based documents (or any subsequent updates to these) and how this has informed the type of product they are proposing. Further, applicants are encouraged to have early discussions with the Council's Housing, Adult Social Care teams and other stakeholders, in relation to ensuring their proposal is addressing a specific local need, consistent with Council's strategies, programmes and any design considerations, as part of the application process.

The Council's affordable housing policy will apply to specialist older people housing falling within a C3 use class. In addition, the affordable housing policy may also apply to C2 proposals that include self-contained units with a greater level of support floor space and there may be potential for residents to purchase them and choose their support/care provider. In relation to tenure of affordable housing within a scheme, the Council may accept a different split if robust evidence is provided by the applicant to justify this, as well as may consider a lower contribution if the units are 100% low cost rented products.

Specialist older persons and care home accommodation must be sensitively integrated into neighbourhoods at locations that are well-connected by public transport, and within easy reach of community facilities and services. Residents, carers and visitors should benefit from safe and convenient access to and from the site as well as the surrounding area. Developments should include accessible pathways and gradients to enable residents to move with relative ease whether by walking or with the use of aids, such as wheelchairs or mobility scooters. Accessibility is vital to ensuring the development adequately responds to the mobility needs of occupiers. It is also important to promote independence and facilitate social interaction, which in turn can help to address isolation and loneliness, which is a key public health issue.

There are a range of specialist older housing products that are designed for older people. Supported housing for other vulnerable groups is covered under Policy HO7. The Council will consider which use class a proposal falls into on a case-by-case basis, although extra care facilities will generally be considered to be C3 use unless they include a significant element of care. This will consider the supporting text of London Plan Policy H13 that provides guidance on the factors that should be considered, to clearly distinguish whether a scheme should be classed specialist older people homes or care home accommodation. Where a development proposal does not meet the attributes of specialist older persons accommodation or care home accommodation set out in the London Plan, then the general housing policies in the London Plan and Local Plan will apply. Regardless of whether extra care facilities are determined to be a C2 or C3 use (or Sui Generis use which could also be justified in principle), relevant

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<sup>12</sup> [https://www.harrow.gov.uk/downloads/file/31688/MPS\\_Accessible\\_\\_\\_New\\_Logo\\_130723.pdf](https://www.harrow.gov.uk/downloads/file/31688/MPS_Accessible___New_Logo_130723.pdf)

policy requirements including affordable housing will apply. Development proposals must provide details of care aspects (including qualifying age), entry criteria, minimum expected numbers of care hours per week and the proportion of residents expected to need different levels of care; and how the facilities are to be funded and managed.

To ensure high quality accommodation is provided, the design of specialist residential accommodation for older people (including new build, conversions and extensions) must demonstrate it has considered and addressed a number of key design aspects. To ensure appropriate privacy for residents, elements of a building should be ranked on a scale of ascending privacy, with the most public spaces close to either main entrances or centrally located, and the private dwellings the farthest away from the main entrance. There should be separation between areas just for residents, staff and visitors with a distinction between shared spaces. Provision of communal spaces must be proportionate to the scale of the accommodation and not excessive, optimising the accommodation for residents whilst maintaining the usability of the communal spaces.

Suitable bathrooms, storage space for equipment and appropriate rooms for activities must be provided. Providing and retaining storage space is important for mobility scooters, hoists and other equipment both in existing accommodation and new provision. In particular, extra care should provide sufficient charging points for scooters, equivalent to 25% of dwellings. Likewise, conversions involving loss of activity rooms/amenity rooms would also need to be justified.

Developments must also make adequate provision for access, parking and servicing for vehicles, with drop-off points for taxis, mini-buses and ambulances located near the building's principal entrance.

When determining applications for specialist forms of older people's accommodation, the Council may take account of detailed standards and design guidance including (but not limited to) the following documents or any appropriate successor documents:

- The design and build of successful extra care housing – Housing LIN17<sup>13</sup>
- Building better care homes for adults – Care Inspectorate<sup>14</sup>18; and
- Extra Care Housing Development planning, control and management – RTPi Good Practice Note<sup>15</sup>

## Reasonable Alternatives:

### Option 1: Continue existing Local Plan policy approach (DM 29)

The current Local Plan Policy DM29: Sheltered housing, care homes and extra care housing is highly permissive. It supports proposals if they are located within accessible locations and only allows the loss of such uses if there is no demand. Applying this option is not considered the preferred option, as it is open to wide interpretation. This will make it difficult to ensure right type, size, tenure older person accommodation,

<sup>13</sup> [Design principles A4 doc 08\\_02\\_11.indd \(housinglin.org.uk\)](#)

<sup>14</sup>

[https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwjs8H81aWCAxVgWEEAHe7uAyEQFnoECBMQAQ&url=https%3A%2F%2Fwww.careinspectorate.com%2Fimages%2Fdocuments%2F2279%2Fbuilding\\_better\\_care\\_homes-040414.pdf&usq=AOvVaw0rMbCi\\_MrjtPuHHN6YWbBe&opi=89978449](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwjs8H81aWCAxVgWEEAHe7uAyEQFnoECBMQAQ&url=https%3A%2F%2Fwww.careinspectorate.com%2Fimages%2Fdocuments%2F2279%2Fbuilding_better_care_homes-040414.pdf&usq=AOvVaw0rMbCi_MrjtPuHHN6YWbBe&opi=89978449)

<sup>15</sup> [GPN8:GPN1 New \(housinglin.org.uk\)](#)

with a sufficient level of care/support, is delivered to address local needs. It will not provide a strong basis to ensure proposals are well designed, located to promote independent living and guidance to distinguish between C2 and C3 use class orders.

**Option 2: Support proposals within/edge of town centres (excluding neighbourhood centres)**

This approach is not considered the preferred option, as some of the town centres have a low public transport accessibility rating score, particularly those located to the north of the Borough. Therefore, although older residents may be able to access local services facilities, there is a potential risk this option may result in poor access to public transport and result in social isolation of older people from friends, families or experience difficulties accessing essential services like health care.

**Option 3: Include a higher target to provide 165 units/total of 1980 of accommodation for older people between 2017-29 (12 years) or 2300 units over a 15-year period**

This approach is not considered the preferred option, as the Draft Local Housing Needs Assessment indicates that the rate of older people population growth is likely to reduce after 2029 and Policy H13 indicates Plans should take account of any local needs information, in addition to the indicative benchmark figure for older people accommodation (within C3 use) included within the former policy. Further, the Plan seeks address older people accommodation needs primarily via the delivery of conventional C3 housing that are well designed to meet the changing needs of the occupants throughout the lives. There is a risk that the potential inclusion of a higher target for older people accommodation may undermine the Council's ability to meet other priority housing needs such as family housing and affordable housing.

## Policy H07: Supported and Sheltered Housing

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter 4 Housing*

### **Policy H07: Supported and Sheltered Housing**

1. The Council will support proposals for the provision of specialist and sheltered accommodation for vulnerable, disadvantaged individuals or groups of the population; providing;
  - a. It is demonstrated the scheme will adequately address a specific local need
  - b. it is suitable for the intended occupiers in terms of the standard of facilities and the level of independence,
  - c. It provides the necessary level of supervision, management and care/support, security and community safety (where necessary)
  - d. it is appropriately located in areas that there is easy access to public transport, shops, services and community facilities appropriate to the needs of the intended occupiers
  - e. Regard must be had to any best practice standards that the Council considers relevant, and which are related to the specific type of accommodation and the people/groups it is targeted to
  - f. Proposals must consider and respond positively to the objectives, priorities of the Councils housing and commissioning strategies
  - g. It contributes to creation of balanced, mixed and inclusive communities and would not result in the over concentration of supported and sheltered housing within a neighbourhood that would result in a harmful impact on the amenities of neighbouring properties and surrounding area.
  - h. . It complies with other relevant policies within the Development Plan
  
2. The Council will resist the loss of supported and sheltered housing unless:
  - (i) adequate replacement accommodation of the same quality and quantity will be provided for the particular group; or
  - (ii) it can be demonstrated that the accommodation is no longer needed for the particular group or other relevant groups in need of supported/sheltered housing; and
  - (iii) it can be demonstrated that the accommodation is not suitable for the care of the intended occupants (or other relevant occupants of supported/sheltered accommodation) in its current condition and format and/or is incapable of being maintained at an acceptable standard

### **Supporting Text:**

The Council seeks to ensure everyone has access to a decent and secure home. Supported and sheltered accommodation provide an essential place of residence for the most vulnerable and disadvantaged individuals or groups of society, as well as can include a certain level of support or care to address their distinct needs. The overall

aim of this type of accommodation is to enable individuals with specific needs to live as independently as possible within the community, with an overall focus of promoting social inclusion.

The provision of a wide range of supported and sheltered housing is likely to be necessary during the Plan period, including permanent, long terms and shorter-term accommodation that meets temporary needs. This can include foyer accommodation<sup>16</sup> for young people, refuges, and long-term accommodation for people with ongoing support needs. The wide range of supported housing types may also include accommodation referred to as hostels (which may or may not have an element of care, but are distinct from visitor accommodation hostels). In planning use class terms, supported housing may be considered Sui Generis, C2 or C3 and would usually be considered exempt from (or be provided instead of) affordable housing requirements.

The Council commissioned Housing LIN to undertake an assessment the future need, over the next ten years (2022 - 32), for adults who have care/support needs, including those eligible for care from Harrow Council adult social care. A summary of the key findings of this are include below

- 1. Adults with mental health needs:** This indicates there were a circa total of 400 individuals , aged between 18-64 living with a mental health related need living in Harrow in 2022. A significant proportion of this population lived in mainstream housing (48%), followed by supported housing (26%), residential care (21%) and a smaller amount in nursing care (5%) and shared lives placements (1%). It projects that there will be a 100% increase in the number of adults who have mental health issues by 2032 (increase of 400 individuals) . But in terms of type of future accommodation needs, their research indicates there will be a gradual shift towards supported accommodation (36%) with significant level of support, to enable recovery and independence, a 50% decline in in people living in nursing and residential care homes and half of needs will be accommodated in mainstream housing with a certain level of support if needed.
- 2. Adults with learning disability:** This indicates there were a circa total of 644 individuals , aged between 18-64 living with a learning disability living in Harrow in 2022 A significant proportion of this population were living with family/friends or informal carers (33%), followed by mainstream housing with care/support (23%), residential care (23%). Whilst a smaller proportion were living within supported housing/living either self-contained or shared (18%) and nursing care (2%). The number of adults with learning difficulties is expected to increase to 675 (5%) individuals by 2033. Further, in relation to type of accommodation required to address this need, it suggests there will be a higher need for supported housing/ living in a self-contained environment (i.e. 25%), a rise in shared lives adult placements (5%), as well as 50% decline in adults living in residential care (11%), a decline in nursing care and a decline in individuals living with family/friends (25%).

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<sup>16</sup> This is a type of secure accommodation that includes support for the personal development and encourages the independent living of its disadvantaged, vulnerable individuals

3. **Adults with learning difficulties/autism:** It is estimated that there will be an increase in 155 people with leading difficulties/autism by 2032. It suggests this need should be addressed via rented supported housing (120) and shared lives accommodation (

The Council's Housing Strategy 2019 indicates there is a continuing need for supported housing to meet the needs of groups such as people with learning disabilities, people with physical disabilities, individuals and families at risk of or recovering from homelessness and rough sleeping, people recovering from drug or alcohol dependency, people with mental ill health, vulnerable young people (such as care leavers and teenage parents) and people fleeing domestic abuse. The Council will continue to work with a range of stakeholders, partners (e.g. registered providers) to deliver additional supported, sheltered accommodation products to address the future needs.

The Council have developed a Market Position Statement (MPS) for Adult Social Care Services in Harrow, which sets out the current commissioning approach and market opportunities for providers, the current understanding of social care needs, forecasts and demand projections. It will set out Adult Social Care's commissioning intentions for Housing, including Extra Care and Supported Living, as well as areas such as Older People, People with Dementia, Learning Disabilities and Autism, Equipment Services and Assistive Technology etc.

Applications should clearly set out how the development will assist in meeting an identified need for the use proposed. It is vital that the accommodation is appropriate for the use and group(s) for which it is intended, so that the specific type of managed care or supervision required can be delivered effectively. Applicant will be required to set out how their proposal has considered and responded to the finding of the above evidence-based documents (or any subsequent updates to these) and how this has informed the need, type of supported or sheltered housing product they are proposing. Further, applicants are encouraged to have early discussions with the Councils Housing, Adult Social Care teams and other stakeholders when developing their proposals for supported and sheltered housing schemes, in relation to the type of product being proposed and specific level of care / management requirements.

Supported housing may be acceptable as part of a mixed-use development, although where a proposal involves more sensitive types of supported housing, this may not be appropriate.

The Council consider supported housing to be any housing scheme where housing, support and (where relevant) care services are provided (or are capable of being provided) as an integrated package. Some schemes are long-term, designed for people who need ongoing support to live independently. Other, semi-independent living options are designed to help people develop the emotional and practical skills needed to move into more mainstream housing and provide varying levels of support. Support can include help with health needs, including mental health, drug and alcohol use, managing benefits and debt, developing daily living skills and accessing education, training and employment. Supported housing provision may be necessary for a range of people/groups<sup>17</sup>. Policy H12 of the London Plan includes a detailed list

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<sup>17</sup> The relevant policy for accommodation related to older people, which may include housing which could be referred to as supported housing, is Policy HO6 Accommodation for older people

of groups for whom supported and sheltered accommodation may be suited for. Applicants will be required to submit a satisfactory management plan, detailing the level, type, duration of support/care that will be provided to the intended occupants. Measures required for the security and safety of the user (if necessary) shall be set out within the management plan.

In order to secure mixed and inclusive neighbourhoods and communities, development proposals should not result in a harmful overconcentration of similar uses within an area.

Existing supported housing and sheltered accommodation will be protected where need exists and the accommodation remains suitable, unless it is adequately replaced. The replacement can occur on-site or off-site and will be considered in terms of both the quality and quantity of accommodation replaced, in line with relevant best practice standards and the ability/need to provide continuation of a service. Off-site replacement may be acceptable but will depend on the quality of accommodation as set out within Part 1 of the policy.

Proposals must demonstrate the supported and sheltered accommodation is no longer needed for particular groups, to justify a loss of these. This should be considered at a local level to ensure that varying changes in provision at a wider scale are considered. Changes in service delivery can render accommodation outdated and no longer fit for purpose. Where loss of such accommodation is proposed, this must be evidenced including information which shows that refurbishment is not possible. Accommodation must be proven to be not fit for purpose for the existing specific supported housing and for other relevant types of supported housing which could reasonably occupy the accommodation. In some cases, a replacement development may provide units meeting different supported housing needs which fall within different use classes.

Proposals involving the loss of existing supported housing must take every opportunity to accommodate unmet need(s) for other relevant types of supported housing. There are a range of supported housing need(s) which will need to be considered, with differing design considerations which need to be considered to assess the feasibility of utilising existing provision. Consultation with the Councils Housing department, Adult Social Care department and/or Children's Services department must occur as part of evidencing meeting unmet need.

### **Reasonable Alternatives:**

#### **Option 1: Continue existing Local Plan policy approach (DM 29)**

The current Local Plan Policy DM29: Sheltered housing, care homes and extra care housing is highly permissive. It supports proposals if they are located within accessible locations and only allows the loss of such uses if there is no demand. This approach is not considered the preferred option, as it is open to wide interpretation. This will make it difficult to ensure right type, size, accommodation, is delivered to address local needs. It will not provide a strong basis to ensure proposals are well designed, with adequate level of care/support to cater for the needs of vulnerable individuals/groups and are well located to promote independent living and guidance to distinguish between C2 and C3 use class orders.



## Policy HO8: Purpose built student accommodation

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter 4 Housing*

### **Policy HO8: Purpose built student accommodation**

1. Proposals involving the development, redevelopment and/or intensification of purpose-built student accommodation (PBSA) will be supported providing:
  - a. It is demonstrated there is a local or strategic need for the proposal
  - b. Proposals for PBSA must be appropriately located:
    - i. on well-connected sites that are easy to access by walking, cycling and public transport;
    - ii. Within or at the edge (300m) of town centres<sup>18</sup>, which benefit from good provision of shops, services, leisure and community facilities appropriate to the student population,
    - iii. Priority is given to sites located in proximity to the education facility the development is intended to serve, or other higher education institutions
  - c. The majority of the bedrooms in the accommodation are secured for use by students over the lifetime of the PBSA, via a nomination agreement with one or more specific higher education provider (HEP). This evidence must include confirmation the proposed rental levels for PBSA are supported by the linked HEP(s)
  - d. A range of accommodation types, including cluster flats with shared kitchen and bathroom facilities, unless it is demonstrated this would be inappropriate
  - e. h. It is well-designed, providing appropriate space standards and facilities and it is sustainable by virtue of being adaptable to alternative residential use or other appropriate town centre uses
  - f. A satisfactory site management and maintenance plan (secured by planning condition) covering the lifetime of the accommodation is agreed by the Council, to demonstrate an acceptable level of amenity and access to facilities for its occupiers and not give rise to unacceptable impacts on the amenities of the occupants of the accommodations and existing residents, neighbouring uses in the surrounding areas.
  - g. The level of PBSA proposals (individually or cumulatively) in a location should not;
    - i) result in the harmful overconcentration of PBSA within a given location and undermine mixed and inclusive neighbourhoods. This will have regard to the character of the area, mix of uses, potential impacts on neighbouring properties and residents within the surrounding area.
    - ii) compromise the delivery of conventional self-contained housing, particularly family and affordable housing to meet the Borough needs, in line with Strategic Policy HO3:
  - h. The maximum level accommodation is secured as affordable student accommodation on-site in line with Policy H15.

2. Proposals for any potential ancillary or temporary use of the accommodation during vacation periods should be designed at the outset of the scheme and should ensure;
  - i. There is no adverse impacts or risks to the safety, welfare and amenities of the existing students and staff occupying the student accommodation, in compliance with any FE or Council policy/regulations
  - ii. There are adequate design measures to limit/restrict the movement of occupants of the PBSA, temporary /ancillary uses and distinguish between the permanent use
  - iii. There is not an over concentration of similar uses, which can impact the balance and mix of uses that can result in potential harmful amenity impacts
3. The loss of existing PBSA will be resisted unless it is demonstrated:
  - (a) It no longer caters for current or future needs,
  - (b) It is unsuitable and unviable for operating within the existing use;
  - (c) the floorspace is replaced by another form of residential accommodation that meets other priority Local Plan housing requirements
  - (d) Exception to the above is if the scheme is proposing to replace an existing accommodation with equivalent floor space that meets modern standards .

### Supporting Text:

London's higher education providers make a significant contribution to its economy and labour market. The Harrow campus of Westminster University is located on the southern edge of the borough boundary, within the administrative area of Brent. It is located within the southern edge of the Harrow and Wealdstone Opportunity area (circa 180m), as well as within proximity to Harrow Metropolitan Centre (circa 500m) and Kenton District Centre (circa 500m). There are several further education institutions; such as Harrow College; situated within the Borough which attract students from both within the area and the greater London area, who generally tend to commute rather reside within student accommodation with the Borough.

The London Plan includes a policy (H15) to consider the need for Purpose-built student accommodation (PBSA). This identified an annual need to provide 3,500 bed spaces of PBSA but does not allocate borough benchmarks or targets. The key reasons are; needs will vary with changes in higher education provider' estates, Government policy, and site availability. Further, it clearly emphasises that "*meeting the requirements of PBSA should not undermine policy to secure mixed and inclusive neighbourhoods*". To date the Council has received a limited level interest for PBSA, but it is very likely the Borough's student population are residing within the existing stock of rental housing products, such as HMO's, flat/house shares or living with parents or family.

The Draft Local Housing Needs Assessment (LHNA) indicates the Borough does not have a high student population compared to other areas within London and it is common for students to attend a University in one Borough and reside in another. Therefore, the LHNA did not undertake a detailed assessment of the housing need for this group. But the households' projections within this show a limited rise in younger sharing households; no significant increase in single person households and couple households without children; who may be a of student age groups (i.e. 15-24 and 25-25-34) during the Plan period (i.e. 2021-41). Whilst the projected rise in other

households is explained by the increase in multi generations households as oppose to sharing households (e.g. HMO, house shares). Although, the evidence does not indicate a need for student accommodation, guidance is needed for consideration of applications that may come forward for a HEP located within another Borough's.

This policy seeks to steer new PBSA within existing town centres (excluding neighbourhood centres) or 300m from the edge of them. These locations are likely to be more; accessible to HEP; conveniently located within proximity to local facilities, services and public transport, including good walking and cycling infrastructure. The key benefits of this are; it will enable students to easily address their daily needs for retail, leisure facilities, local facilities via sustainable modes of transport (without private car use), reduce the cost of living; as well as support the vitality, viability, and the regeneration of the Borough's Town Centres. Further, it will help avoid the risk of the potential adverse impacts of the potential high cluster of various types of student accommodation in residential areas of the Borough that are characterised by dwellings are predominately occupied by family housing (i.e. on street car parking, displacement of family households, affordability of housing, amenity issues). Applicants will be required to demonstrate the site selection process has given priority to locations that are within proximity to HEP that the PBSA is intended to serve. PBSA that is intended to meet a need from outside of the Borough should be supported by sufficient justification in relation to the site location, both locally and in the individual site context.

To avoid speculative student accommodation, new PBSA schemes proposed by private providers must be developed and secured (via a nomination agreement) for occupation by students of one or more specific HEP. This ensures proposals will genuinely address an identified need. In line with Policy H15 of the London Plan (2021), applications will only be permitted if they provide evidence of an end user affiliated with a HEP and demonstrate appropriate management arrangements are in place, so that rooms will be rented solely to students over the lifetime of the development, including an identified landlord, agent or management company. Further tenancies should have regard to the likely level of financial support/income of the intended occupiers and the proposals rental levels should be submitted, with evidence the HEP support this.

Site management and maintenance plans are important to delivering successful PBSA schemes, as well as avoiding potential harmful amenity impact on the on its occupants and the surrounding neighbourhood. These plans will be required for all new PBSA and will normally be secured as a planning condition. The plans will be expected to cover matters like site management and maintenance, on-site wardens, communal facilities, safety and security for occupants and the elimination of potential amenity issues.

Student accommodation can benefit the Borough's neighbourhoods and communities, by attracting a population that can boost the level of expenditure within the Borough's town centres, provide more skilled flexible labour for local businesses and services, addressing the potential impacts of an ageing population, retaining a highly skilled/knowledgeable workforce to make the area attractive for new investment, creating additional jobs and businesses locating within the area. But an overconcentration of student accommodation within a local area can have a harmful impact on the amenity of existing residents and uses, as well as undermine objectives for delivering mixed and balanced communities. Further, this issue can compromise the delivery of conventional housing that are of higher priority to address the Borough's

future housing needs and may not always result in the optimal use of the land<sup>19</sup>. In instances where, there is a potential risk of an over concentration of student accommodation within a given location, the Council will resist proposals.

The Council will expect proposals to consider the specific requirements of HEP and take these into account wherever possible. Schemes will be expected to include a range of accommodation, including clustered study bedrooms with shared facilities, double units, and single and studio units. Cluster flats with shared facilities are likely to be more affordable than en-suite single rooms and self-contained studio units. Student unit sizes and layouts should be varied, particularly to cater to the needs of wheelchair users, mature students with families, students who want to live alone and for groups of students using shared facilities. The provision of a variety of layouts will allow for greater flexibility for conversion to permanent self-contained housing or other appropriate town centre uses if in future the building is no longer needed as student accommodation, thus ensuring its sustainability. If it has been demonstrated that it would be inappropriate to include a range of accommodation within the scheme, applicants will be required to demonstrate they have considered different layouts at the design stage for a scheme, to enable it to easily be converted to conversion to a C3 residential use or other appropriate town centre uses (e.g. C1 hotel) in the future, if the shared living scheme is unsuccessful. This will help to ensure the sustainable use of scarce resources.

Although most students require accommodation during term time only, some residents may need a permanent home throughout their studies and development therefore should make provision of units for year-round occupation. To help ensure the viability of PBSA, the Council will provide flexibility to allow for the temporary or ancillary use of accommodation during vacation periods or term breaks. Proposals will be considered on a case-by-case basis. Planning conditions or legal agreements will be used to ensure that any temporary or ancillary uses do not result in a material change of use of the building.

The London Plan requires that at least 35% of PBSA should be secured as affordable housing. This is to ensure that students with an income equivalent to that provided to fulltime UK students by state funded sources of financial support for living costs; can afford to stay in PBSA. The definition of affordable student accommodation as set in the London Plan will be applied and its supplementary guidance. London Plan Policy H15 (PBSA) sets out the requirements regarding the delivery of affordable student units and should be referred for further information. Affordable rent levels may be subject to periodic review over plan period, considering any significant changes to the Government's student maintenance loan regime.

The Council will seek to prevent the loss of existing student accommodation, to ensure it does not adversely impact on existing capacity or existing residents, whose displacement could create additional pressure on the conventional housing market. However, flexibility will be applied where it can be suitably demonstrated that demand for the provision in question no longer exists. We will encourage the refurbishment of buildings to ensure student accommodation is brought up to an acceptable modern

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<sup>19</sup> e.g. For Monitoring housing purposes the London Plan indicates that 2.5 beds within PBSA = 1 C3 dwelling V C3 self-contained housing = 1 dwelling

standard. Proposals will be supported where there is adequate re-provision of accommodation and compliance with other policies.

### **Reasonable Alternatives:**

**Option 1: No Policy.** This approach is not considered the preferred option. This would result in a policy void and make the Council highly reliant on national and London Plan policy for determining proposals. This will give the Council less control to promote good design, ensure development is located within the most accessible locations, prevent an over concentration of such uses and minimise their potential harmful amenity impacts. It will also make it difficult for the Council to ensure development is addressing priority housing needs of the area, such as conventional self-contained C3 housing, family and affordable housing.

### **Option 2: Allow PBSA schemes within accessible locations with PTAL 3-6**

This approach is not considered the preferred option, as PBSA tend to be large scale and may adversely impact the character of residential areas. It may result in the loss of family sized housing areas, if clusters of student accommodation occur in areas where PBSA scheme is located/close to it and may result in other harmful amenity impacts on neighbouring properties.

## Policy HO9: Large scale purpose built shared living

Linkages:

NPPF Chapter XX:

London Plan Chapter 4 Housing

### Policy HO9: Large scale purpose built shared living

- 1 Proposals for large-scale purpose-built shared living (LSPBSL) will be supported where they comply with London Plan Policy H16 and the following requirements:
  - a) Proposal will be required to demonstrate how they are meeting an identified local housing need based on local incomes, rent levels and existing/future demographics of the Borough
  - b) Applicants will be required to demonstrate the affordability of the proposed LSPBSL products within their scheme compared with the alternative products within the Harrow private rental sector,
  - c) Proposals should be located within the boundaries of Harrow Metropolitan Centre and Wealdstone District Centre (with a PTAL of 5-6) that form part of the Opportunity Area
  - d) There must not be two LSPBSL schemes within a 250m walking distance of each other, to; avoid an over-concentration of similar uses. To justify a departure from this requirement, applicants will be required to demonstrate exceptional circumstances. Robust evidence will be required to demonstrate:
    - i) There is no appropriate alternative town centre use such as offices, and C1 hotels or mixed-use schemes (where relevant) that would be suitable and viable on the application site
    - ii) There is no appropriate alternative use for the site that would be suitable and viable (including C3 residential or a mixed-use scheme) and
    - iii) It would be unviable, unsuitable to have a LSPBSL scheme developed at a lower scale via multiple uses (preferably in two separate blocks of development) that incorporates part of a site/development for LSPBSL the remainder for alternative uses in line with criteria (i) and (ii) above
  - e) The LSPBSL scheme should not have a detrimental impact to;
    - i) Residential amenity of the neighbouring properties and surrounding area
    - ii) The character of the area
    - iii) The need to support and maintain mixed and inclusive communities
  - f) Proposal on sites with extant permission or allocated for self-contained dwellings will not be supported, to avoid compromise the delivery of conventional housing to address future needs and targets, unless adequate evidence is submitted to demonstrate viability issues
  - g) The ground floor of the scheme should be designed and located to be active street frontage or public realm. It must include;
    - i) Flexible workspaces,
    - ii) Public amenities (e.g. restaurants, cafes, leisure facilities) that are accessible to the wider public, to integrated it into the surroundings area, as well as develop inclusive and sustainable communities.

- h) To support a circular economy, proposals must demonstrate a flexible design and layout, to allow the LSPBSL scheme to be converted/retrofitted to an C1 hotel or C3 self-contained residential uses, or other town centre uses without the need for demolition and rebuild
- i) Proposal must demonstrate satisfactory servicing arrangements are in place for deliveries, waste management and emergency vehicles and no adverse impact on the safe operations of the highway network, in line with other Local Plan Policies
- j) The applicant must provide a management plan , to the satisfaction of the Council, to address the requirements of the Policy H16 of the London Plan and the Mayors London Plan Guidance on LPBSHL . This will be secured by way of a S106 agreement.
- k)
  2. The design and layout of LSPBSL schemes in terms of their layout, functional living spaces, level and type of communal facilities must be in compliance with the LSPBSL London planning guidance (LPG)
  3. Affordable housing contributions will be required, in accordance with London Plan Policy H16
  4. The Council will resist any proposals that seek to reduce the quantity, type or restrict access of amenity provisions included within LSPBSL, after permission has been granted.

### Supporting Text:

Large-scale purpose-built shared living (LSPBSL) housing is a purpose-built managed rental development, with non-self-contained units comprising of functional private living areas with extensive communal spaces and facilities, under single professional management. They include a wide range of amenities to support a diverse community of residents and their needs. They provide a housing option for households who cannot or choose not to live in self-contained homes, flat shares or HMOs and are often targeted at younger, single, high skilled professional individuals who may use this product on transition basis until they find suitable long-term housing, as well as for those working within London part of week or on a temporary basis . They can help add to the stock of rooms available for rent in the borough but are different from other rental products (such as HMO's, hostels) and LSPBLS can be less affordable than the alternatives. But they differ from other products in terms of the general size of rooms sizes, the level/type of communal facilities and arrangement for management/maintenance of the scheme. They could play some potential role to help free up the stock of other forms of accommodation, particularly family sized housing (three bed or more) that are highly required to address local housing needs during the Plan period. However, further research is required in this relation to the extent of this relationship, as LSPBSL products are a relatively new product in private rented sector of the London housing market. .

LSPBSL housing is a unique new form of development that seeks to address the demands of a niche subset of the housing market that do not fall within conventional C3 residential use, so policies are required to shape the delivery of these. This helps ensure LSPBSL are well designed, with adequately sized rooms, a sufficient quantity

and quality internal/external communal areas and facilities; to enable future residents to fulfil their daily needs, interact with one another; and develop sustainable, cohesive communities, as well as promote their health and well-being. They may provide residents with increased security via a medium – long term tenancy agreement, to enable them to establish themselves, feel more connected to a locality, and be part of a community. Assuming LSPBSL schemes are well managed, maintained, they may avoid generic issues related to HMO properties, hostels, flat shares; such as a lack of/poor quality shared communal facilities and amenity facilities, insufficient parking spaces, lack of long-term tenancy security and transitory living, as well as the poor management/maintenance of properties. Policy can also seek to ensure future schemes are located within the most accessible locations to local facilities, services and avoid the potential loss of residential uses/permissions via speculative applications and an over concentration of LSPBSL and other similar uses.

In compliance with the London Plan, for developments to be considered LSPBSL, schemes will need to consist of at least 50 non-self-contained units.

The Draft Local Housing Needs Assessment did not identify any requirement to provide LPBSL accommodation to address any specific local housing needs, as a younger population (aged 25-44) and single households are not projected to increase during the Plan period and the Borough lacks a significant student population. Further, a significant level of future housing need is for larger family sized dwellings (three bed or more) or medium sized of units that could potentially be occupied by families, as well provide accommodation that is suitable for an ageing population. Further it states *“Whilst LSPBSL provides an additional housing option for some people, due to the unique offer of this type of accommodation, it does not meet minimum housing standards and is not therefore considered to meet the ongoing needs of most single person households in London”*.

Therefore, applicants will need to demonstrate their LSPBSL proposals will address local housing needs. This should include an assessment of the local rental rates, incomes of residents who are likely to reside within LSPBSL, current/future demographic trends, and any other relevant market factors (if necessary). Further, applicants will be required to demonstrate how the affordability of their proposed LSPBSL products compares with alternative products within the private rental sector of the housing market. This evidence will enable the Council to determine if there is a local need for LSPBSL product and if these are the most appropriate for addressing this, as well as meeting other policies / objectives in the Local Plan, such as the retention of family size housing rather than these being converted to HMOs. Further, it is important for policy to ensure LSPBSL does not compromise the delivery of conventional housing (i.e. sites with extant permission, allocations,) to address future housing needs and meet targets<sup>20</sup>. This approach prioritises the delivery of conventional self-contained housing to address the needs of families and low-income groups who require affordable housing, as well as avoids any potential harmful effects of any over concentration of LSPBSL on residential amenity or the mix of uses and balance of population in a neighbourhood.

In compliance with the London Plan, proposals for LSPBSL will be supported within boundaries of the Harrow Metropolitan Town Centre and Wealdstone District Centre, which have a high public transport accessibility rating (5 -6 in line with Policy T6.1 of

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<sup>20</sup> .e.g. 1.8 beds of non-self-contained housing such as LSPBSL= 1 C3 unit for monitoring purposes



the London Plan). They form part of the Harrow Wealdstone Opportunity Area and are considered the most sustainable location for accessing public transport, local services, facilities and pursuing employment opportunities. The Plan anticipates the Harrow & Wealdstone Opportunity Area will accommodate a significant level of housing and employment growth. The town centres are the most suitable locations for accommodating 50 or more units LSPBSL schemes and the supporting communal facility required to deliver functional living spaces, whilst minimising any potential harmful effects on the character areas of the Borough and ensuring viability. It should be emphasised that LSPBSL schemes tend to be built at high density and are likely to require 4 or more storeys development. In contrast, the predominant character of the Borough is two -three storey in suburban locations and three to four storeys with the town centres and near transport hubs. This means such schemes are unlikely to be suitable in locations outside of the above town centres or unviable, as developers would need to deliver a higher level of units to benefit from economies of scale required, in order to fund the cost of providing/servicing communal facilities and managing the development to a satisfactory level.

This policy requires that two or more LSPBSL schemes should not be located within a 250m distance of each other (i.e. existing permissions, constructions, completions) in order to avoid an over concentration of such uses that could have a detrimental impact on residential amenities, the character of the surrounding area, the diversity and mix of uses, as well as the objective of promoting mixed and inclusive communities. Further, the potential over delivery of LSPBSL products will compromise the delivery of conventional self-contained residential accommodation and fully address local housing needs, particularly for increasing the delivery of family sized and affordable housing. However, the policy includes some flexibility for this requirement, to enable the Council to consider applications that may be contrary to this. Applicants must submit robust evidence to demonstrate that no alternative uses would be suitable and viable on their site (e.g. town centre uses, mixed uses). Also this evidence should consider whether the scheme could include a LSPBSL use at a lower scale and include multiple uses on the remaining site/development, preferably in separate blocks; as it can sometimes be difficult to distinguish/limit uses (after permission is implemented) and its potential impacts in a single block via planning processes. This also helps avoid a potential oversupply of LSPBSL accommodation that could have adverse economic, social impacts for the Borough and allows the Council to monitor the locations and potential impacts of this new product during the Plan period.

Applicants will be required to submit a satisfactory Management Plan in line with Policy H16 of the London Plan and the Mayor London Planning guidance, which will be secured via a S106 agreement. This will cover matters such as the need to demonstrate adequate operational arrangements, how spaces will be maintained, and the scheme will function as a high quality LSPBSL, as well as the measures to mitigate any potential harm to the amenities of future residents and neighbouring properties.

Applicants must refer to and ensure consistency with the London Plan Guidance for LSPBSL in relation to the design and space requirements, room sizes (including accessible units), the level/type of communal areas/facilities required and layouts. The private rooms must provide a satisfactory personal functional living space and environment for the health and well-being of residents. Each personal room should include a window, with an adequate level of natural sunlight and ventilation. The units

within the scheme should not be used or be capable of being used as self-contained residential accommodation.

Proposal must ensure a sufficient level and type of internal communal space is provided for the number of private units proposed within a LSPBSL scheme, given the relatively small size of private space and potentially a high number of residents residing and using these. An adequate quantity of kitchen facilities, dining and lounge areas are an important component of shared living. These should be well designed and highly accessible, to meet needs of all users. They should enable residents to fulfil their day to day needs, interact, socialise with their neighbours, develop healthy relationships and build a diverse inclusive, cohesive community. Communal spaces should provide a range of amenities that facilitate health and wellbeing that support a diverse community and address their daily needs. Applicants must provide evidence to demonstrate how communal areas/facilities are designed to enable incidental meetings, socialising, interaction between residents, to foster positive friendships, relationships and a sense of community.

Applicants will be required to provide some flexible workspace within the ground floor a scheme, as the opportunity to provide commercial floor space are limited due to the constrained nature of the Borough. This will provide some workspace for the internal and external residents, particularly for SME's as well as help create commercial networks, attract investment, create additional jobs, boost economic growth and help achieve the Borough's economic objectives. Further, public amenities (i.e. café, restaurant, leisure facilities such as a gym) should be provided that are accessible to the wider public with active frontages on the ground floor of the scheme, to avoid creating closed communities and integrate the scheme into the wider area.

LSPBSL schemes fall within a sui generis non-self-contained market housing use. Both the functional private living areas, communal areas/facilities should be designed, planned to be used integrally by future residents at the outset and these schemes should not be used to provide a mass quantity of poor-quality mini self-contained living units, as an alternative to providing well designed, high quality C3 residential dwellings. Any applications for change of use to convert these schemes to C3 residential use at a later date can be very challenging. To effectively achieve this, applicants will be required to demonstrate they have considered different layouts at the design stage for a scheme, to enable it to easily be converted to conversion to a C1 hotel or C3 residential use (or an appropriate town centre use) in the future, if any unforeseen adverse market conditions arise (.e.g. lack of demand for the product, development viability), as well as help encourage the efficient use of resources, reduce waste, promote the circular economy and work towards the achievement of net zero carbon target, in line with Local Plan Policies 08 and CN10

### **Reasonable Alternatives:**

**Option 1: No Policy.** This approach is not considered the preferred option. This would result in a policy void and make the Council highly reliant on national and London Plan policies for determining proposals. This will give the Council less control to promote development within the most accessible locations, prevent an over concentration of such uses and minimise their potential harmful amenity impacts. It will also make it difficult for the Council to ensure development is addressing priority housing needs of the area, such as conventional self-contained C3 housing, family and affordable housing.

**Option 2: Do not require applicants to demonstrate a need for LSPBSL**

Although, this approach may provide developers with more scope to determine the type of housing products that should be provided on their site to address a perceived demand in the local housing market, but it will provide less of an incentive to ensure a local housing need is being addressed. Conversely, it will make it more difficult for the Council to require developers to ensure their scheme is addressing the priority needs of the area, which are conventional self-contained C3 housing, particularly affordable housing and family sized dwellings. Further, LSPBSL products tend to be less affordable than other products in the private rental sector and there is uncertainty on the extent to which it may help other issues such as overcrowded housing, under-occupation and freeing up the stock of family sized housing (e.g. properties in HMOs). The NPPF requires Plans to boost the supply of housing of the right, types, size, tenure in order to address the needs of groups with specific housing requirements (para 60, 62). This approach is not considered the preferred option.

**Option 3: Allow LSPBSL within Metropolitan and Major Town Centres, all areas of PTAL 5 – 6 (car free developments) in line with Policy T6 of the London Plan or PTAL 3-6**

This approach is not considered the preferred option, even though there are small parts of other town centres within the Borough fall within PTAL 5-6 and Edgware is a Major Town centre. The key reasons are LSPBSL schemes need to be built at a high density, with more than four to five storey height, in order to provide a sufficient quantity of communal facilities, manage/maintain the property at a satisfactory level and maintain viability of it. Whilst the character of the Borough comprises of two -three storey in suburban locations and three to four storeys with the town centres and near transport hubs. This means significant parts of the Borough are unlikely to be suitable for LSPBSL schemes due to the potential impact on the character of the area and the need for economies of scale to apply to ensure viability.

**Option 4: Do not include distance test for assessing over concentration of LSPBSL**

This approach is not considered the preferred option, as it will make it more difficult to assess, prevent the potential over concentration of the LSPBSL schemes within a given locality, as well as minimise any potential related impacts on residential amenities, the diversity and mixed of uses and the objective of promoting mixed and inclusive communities. A related issue is that this option may undermine the delivery of conventional self-contained residential accommodation and address the priority local housing needs (i.e. family sized dwellings, affordable housing). However, the policy includes some flexibility to consider proposals that may be contrary to this requirement, in exceptional circumstances.

## Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

Linkages:

NPPF Chapter XX:

London Plan Chapter 4 Housing

### Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

Development proposals for Houses in Multiple Occupation (HMO)<sup>21/</sup> and Hostels with shared facilities in the Sui Generis Use Class will only be permitted, providing they comply criteria below:

- (1) It is located within an area that has a PTAL rating of 4-6 with good access to public transport, local services and facilities.
- (2) It does not result in the loss housing suitable for accommodation by families based on following:
  - a): Internal floor area should exceed 130m<sup>2</sup> (as originally built) and
  - b): It should not be located within a residential street or area that is characterised by family housing
- (3) There should be no harmful impact on the amenity of occupiers of neighbouring properties and the character of the area.
- (4) Adequate arrangements are made for the provision of amenity space for future occupiers in terms of access to gardens and communal facilities and areas.
- (5) It is well-designed, with appropriate number of rooms of an adequate size, facilities that provides a high-quality accommodation that satisfies the relevant standards for HMOs in the licencing regime<sup>22</sup>, including the provision of adequate functional living spaces and layouts.
- (6) Adequate arrangements are made for the storage and collection of waste and recycling material generated by future occupiers of the development, which does not give rise to nuisance to future occupiers and neighbouring properties or a detrimental impact upon the streetscape.
- (7) It should ensure all habitable rooms have a satisfactory environment in terms of privacy, daylight, sunlight, outlook and exposure to external noise.
- (8) it ensures a balance of hard and soft landscaping on the forecourt (including forecourts that are already substantially hard surfaced) that does not detract from the appearance of the property or the street scene;
- (9) Adequate provision is made for car parking and safe access to property and does not result in a harmful cumulative increase on street parking (in compliance with policy M2 Parking) or the safety of other road users.
- (10) It contributes to creating an inclusive community and would not result in the over concentration of HMO's/Hostels within a neighbourhood that would harm the mix, balance and well-being of communities. For HMO's, an over concentration is defined as an instance where three or more of the nearest ten

<sup>21</sup> NB: This Policy will also apply land use class C4 (and any subsequent updates to use class orders), if the Council introduce an article 4 during the Plan period (.i.e. a small HMO housing 3-6 people)

<sup>22</sup> Applicant should refer to the HMO standards in the link below or any subsequent equivalents to this.  
<https://www.harrow.gov.uk/downloads/file/23800/hmo-standards-and-regulations.pdf>

properties are HMO's, ( i.e. 5 on each side of an application site, on the same side of the highway).

- (11) .The Council will resist proposals that result in the loss of good quality hostel accommodation that address a specific local need for vulnerable members section of the community, unless
- a. It is demonstrated there is no local need for the type of accommodation.
  - b. it is for a for a replacement provision at an equivalent or better standard
  - c. It is demonstrated to be unviable or unsuitable for addressing the needs of its users.
  - d. The replacement provision is addressing a more acute local need (e.g. affordable housing)

### **Large Purpose-built HMO developments**

12. The Council will resist proposals for new large purpose-built HMO developments, as these are not considered the best approach to meeting housing needs in the borough, and can result in a poor-quality living environment for the occupants and potentially significant harmful amenity impacts on the surrounding area. On sites where the Council considers that large purpose-built HMO developments may be an acceptable form of housing in principle, proposals must:

- a) located within an accessible location to local facilities, services, transport in accordance with criteria 1
- b) not result in the loss of housing that is suitable for accommodation by families, in accordance with criteria 2 above .
- b) prevent any harmful amenity impact(s) on the surrounding neighbourhood and the character of the area ( in accordance with criteria 3). A sufficient evidence – including a detailed management plan – must be provided demonstrate this.
- c) Result in a well-designed and satisfactory living environment for its occupants in line with criteria 4-9 above
- d) A sufficient level, type, of communal facilities and spaces should be provided to adequately address the needs of the expected level of number occupants. These should not be located in too few locations, conveniently accessed and be designed to encourage incidental meetings, socialising, lounging and recreation between residents, to foster friendships and a sense of community.
- e) Not result in an over concentration of similar uses and the achievement of mixed, inclusive communities in line with criteria 10

### **Supporting Text:**

A house in multiple occupation (HMO) is a form of residential accommodation that is occupied by unrelated persons, who share amenities such a kitchen, bathroom, etc and form two or more households. A household is generally a family (or people with relationships similar to a family), including single persons and co-habiting couples. There are two main planning use classes for housing with shared facilities. A Use Class C4 HMO that is a 'small' HMO used by 3 to 6 unrelated people. A 'large' HMO

shared by more than 6 unrelated people is a Sui Generis use<sup>23</sup> (i.e. does not have a specific use class). For the purposes of this policy a hostel includes a building providing temporary non-self-contained residential accommodation with an element of supervision, but with no significant degree of care. Hostels are a sui generis use.

A permitted development right exists to convert/change the use of a residential accommodation (C3 use) into a 'small' HMO (use class C4). In contrast, planning permission is required for the use/development of land and buildings for large HMOs in a Sui Generis use. This allows the council to consider issues such as access, design, parking, location; impacts on the character, amenity of surrounding area and neighbour properties. All HMOs require a mandatory licence from the Council, which is outside of planning controls. This ensures HMOs are built and maintained / operated to a certain standard (e.g.. room sizes, number/type of communal facilities, health and safety), well managed but this route does not allow the Council to assess its potential amenity impacts on the neighbouring properties and surrounding area, as well as location factors.

HMOs can provide a valued source of affordable accommodation in the stock of housing, providing they are of high-quality design, provide good quality living standards and adequate space for people to live in. They are particularly important addressing the housing needs of;

(1). young and transient groups of the population, who have not reached a stage where they can or want to buy;

(2).Vulnerable people and those on lower incomes who are unable to gain access to other forms of housing (e.g. self-contained accommodation)

(3) for people who would otherwise be homeless, without bedsit type of accommodation, as they cannot afford to rent or buy a property as a single household.

The London Plan (2021) acknowledges the role that HMOs play, as a strategically important part of the Capital's housing offer, with a provision that helps to meet distinct needs and reduces pressure on other elements of the housing stock.

The Draft Local Housing Needs Assessment (2022) indicates that the size of private rented sector has significantly increased since 1991 and HMO type of shared accommodation have been particularly important for addressing the needs of the younger population due to the increased pressure on the stock of social housing and rising levels of rents. Further, it indicates that the number of sharing households aged between 25-44 years and single person households are not projected to experience any significant growth during the Plan period. Despite this, large-scale purpose-built shared living (LSPBSL) (see Policy HO9) may have the potential to play a role in reducing the pressure for family size housing to be converted to HMOs (subject to further evidence). The policy above reflects these two factors by seeking to resist the conversion of family-size housing to HMOs. It however also recognises that HMOs offer a more affordable form of shared living for those who cannot afford any other

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<sup>23</sup> The above provides a summary of HMOs and the full legal definitions should be referred as appropriate, as set out in the Town and Country Planning (Use Classes) Order 1987 (as amended). There are separate definitions in respect of the legal licencing of HMOs as set out in the Housing Act 2004 and related secondary legislation.

alternative and are unlikely to be offered accommodation in affordable housing (i.e. single persons).

There are concerns that a high concentration of HMO's can have a cumulative harmful impact on neighbouring properties and the surrounding area. The key reasons include; the potential negative impact of the potential loss of family housing and the increased number of families having to reside in unsuitable accommodation (i.e. smaller overcrowded dwelling with a lack of satisfactory amenities, poor location); a transient population replacing settled family occupants, reduction in environmental quality, loss of character, waste management, overcrowding, increased anti-social behaviour and noise/disturbances, changes in supporting infrastructure such as shops, pressure on parking, as well as sustaining balanced, mixed and inclusive communities. HMOs can also push up rents or inflate the price of properties for sale that would otherwise accommodate families. Therefore, it is important for future policy to seek to address and minimise these potential harmful impacts.

In general accordance with the London Plan (2021), this policy seeks to facilitate HMO conversions, which intensify the use of existing premises, within the most appropriate locations that have good access to public transport, local services and facilities (i.e. PTAL 4-6). This in turn promotes the use of sustainable modes of transport, reduces the need to travel by private car; as well reduces the potential risks of harmful effects, such as the need for higher levels of hard standing areas for car parking that can result in the loss of biodiversity/soft landscaping in front gardens, increased surface water run-off. Managing the locations of HMO's also assists in mitigating negative impacts on the character of the Borough and the potential loss of larger housing in areas that are characterised by family housing.

To ensure that HMOs are built, maintained and managed at an acceptable standard, the Council operates mandatory and additional licencing schemes, in accordance with housing legislation. Through this regime the Council has published the Harrow Standards for Licensable HMOs<sup>24</sup>. All development proposals for HMOs must ensure these standards (i.e. size of rooms, level/type of communal facilities, management plans, emergency procedures), or any future equivalent, are met as a minimum, irrespective of associated licencing requirements. The standards should be considered alongside other planning policies to ensure that new housing is fit for purpose.

As the other sections of the Plan (e.g. housing size mix, conversion policies) have emphasised, the Draft LHNA indicates there is a high priority to increase the delivery of family sized housing to address the future local housing need. The Local Plan evidence indicates that the potential scope to achieve this may be constrained by size, type and location of sites that may come forward during the Plan period. These factors have resulted in housing affordability issues for young and low-income households. Therefore, this policy seeks to protect smaller sized family housing (below 130m<sup>2</sup>) as this is likely to result in poorly designed accommodation and living environment for HMO tenants and the loss of the lower cost family housing stock. Whilst it will allow the potential conversion of dwellings into HMO's providing the applicants demonstrate the location of the application site is not characterised by family housing. In relation to this, a recent legal judgement for a challenge to a decision clarifies that the

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<sup>24</sup> Applicant should refer to the HMO standards in the link below or any subsequent equivalents to this.  
<https://www.harrow.gov.uk/downloads/file/23800/hmo-standards-and-regulations.pdf>

assessment of whether location/street is characterised by family housing should not be limited to the physical appearance of the built environment/premises and can also consider factors like occupancy and uses.

The open, green quality of the suburban environment is part of Harrow's historical appeal. This has been impacted by hard landscaping to mainly accommodate cars in front gardens and to a lesser extent manage/store waste. This has reduced the level of incidental green infrastructure, which has affected the visual quality of the environment, biodiversity and surface water run-off. Therefore, the design of proposals should consider appropriate levels of well-designed soft/landscaping and urban greening to protect and enhance biodiversity, in line with Local Plan policies. In addition, the accommodation of bins within the site requires careful attention. The provision of bins within private amenity spaces usually offers the best solution in terms of householder responsibility for use, maintenance and waste segregation, and helps to avoid the excessive accumulation of bins on forecourts. Any alternative solution may be acceptable in exceptional circumstances; such as a storage shed on the forecourt/front garden of a property, providing it is well designed in terms of its location, materials and includes an appropriate level of soft landscaping to adequately screen it from the street and protect the character of the area. Applicants should also review the Council's future Waste Strategy and ensure compliance with the requirements of this, particularly in relation to; ensuring waste vehicles can access the property, this area being kept clean and clear.

Applicants will be required to demonstrate adequate consideration of the design, layout, privacy and amenity issues, to ensure a satisfactory living environment for the occupants and minimise risks of any harmful effects on neighbouring properties. Proposals must ensure all the occupants have an obstruction free, convenient access to communal amenity areas and facilities; such as kitchens, bathrooms, WC's and gardens. In relation to; addressing issues such as waste management, car parking, hard/soft landscaping proposals must ensure measures to address these do not result in any harmful impacts on the occupants of the premises, neighbouring properties and the character of the area.

New HMOs should contribute positively to their local area and an appropriate distribution of different types of housing provision across the Borough, along with the protection of the character and amenity of immediate and neighbouring properties. To assess the potential for over-concentration HMOs within a location, a simple policy approach will be applied that seeks to allow no more properties being HMOs, where three already exist in the ten nearest adjacent properties to the application property. This is measured taking the nearest front entrances when walking from the front door of the application property on the same side of the highway (i.e. 5 properties on either side of application site). Landlords will be expected to register properties in conformity with the council's licensing scheme.

Certain types of hostels providing accommodation are important and necessary uses for increasing housing choice and access to meet specific forms of housing need. Therefore, the policy seeks to prevent the unnecessary loss of them to other uses, unless proposals comply with the criteria.

The Council will resist proposals for large purpose-built HMO developments, as the Local Housing Needs Assessment did not indicate any significant growth in the younger population (25-44), single households and that the priority is to increase the



delivery of conventional self-contained C3 family sized housing and affordable housing. These types of developments can result in; a poor-quality living environment with inadequately sized rooms; insufficient quantity, type of communal facilities; and a lack of secure tenancy, which can have a negative effect on the health well-being of residents. They also encourage a transient population and the poor maintenance and management of the scheme, along with a potential over concentration of HMO's within a given locality can have significant harmful impact on the occupants of it and residents in the wider neighbourhood.

Large purpose-built HMO developments may be acceptable, if; they do not result in the loss of accommodation suitable for families, no harmful amenity impacts on the neighbouring properties and can demonstrate compliance with the criteria included in the above and other relevant policies. A sufficient level of evidence – including a detailed management plan must be provided, to demonstrate adequate operational arrangements, how spaces will be maintained, and the scheme will function as a high-quality development, as well as the measures to mitigate any potential harm to the amenities of future residents and neighbouring properties.

The Council will monitor the locations of where new HMO properties are delivered (via the licenced and application route), the potential impacts of these on specific locations of the Borough and for addressing local housing needs, during the Plan period. Depending on the outcome of this, the Council may consider whether an Article 4 direction should be introduced to remove the permitted development right that allows residential dwellings to be converted to small HMO uses without the submission of a planning application. It should be emphasised that National Policy has strengthened the test for introducing an article 4 direction and limits its geographic scope. It indicates this should “*be limited to situations where an Article 4 direction is necessary to protect local amenity or the well-being of the area; be based on robust evidence, and apply to the smallest geographical area possible*” (Para 52, NPPF 2023).

### **Reasonable Alternatives:**

#### **Option 1: Continue to apply existing policy (DM30)**

The adopted Local Plan Development Management (2013) Policy DM 30 is considered highly permissive for HMO/hostel proposals. It includes a generic criterion requiring proposals to demonstrate; good accessibility to local facilities, compliance with accessible homes standards and satisfactory living conditions and no adverse amenity impacts. Although this option may help in providing a relatively affordable stock of accommodation the continued use of this is considered inappropriate. The key reasons are; it is open to wide interpretation by all stakeholders and does not reflect the most up to date evidence of need. Further, the use of this will make it difficult for the Council to prevent the overconcentration of HMO's and the potential harmful amenity impacts of these, as well as encourage well designed living environments for residents , prevent the loss of family housing and ensure HMOs are located within the most accessible locations. This approach is not considered the preferred option.

#### **Option 2: Allow conversion of family houses to HMOs (i.e. no consideration of the houses internal floor area (130m<sup>2</sup>) and the character of the area)**

This approach is not considered the preferred option, as it will result in the potential loss housing that is suitable for families, including the stock of smaller housing that may be more affordable for low income or younger households. It is difficult to replace

the loss of family sized housing due to the type, location of sites that are likely to come forward for development. Further, the change of use of smaller housing (below 130) may result in a poorly designed living environment for the HMO occupants.

**Option 3: Allow HMOS within accessible locations with a PTAL 3-6**

This approach is not considered the preferred option , as this may have an adverse impact on the character and harm the amenities of areas characterised by family housing, as well as increase the potential loss of family housing.

**Option 4: Do not include a specific measure to assess the over concentration of HMO's**

This approach is not considered the preferred option, as it won't allow the Council to assess or prevent the potential over concentration of the HMOS schemes within an area, as well as minimise any potential cumulative related impacts on residential amenities, and achieve mixed and inclusive communities. A related issue is that this may reduce the stock of family sized housing accommodation, which is difficult to provide via new development, which tends to be high density due to location of previously developed sites (i.e. close to town centres) and their high land values. This may result in families residing in unsuitable, overcrowded accommodation or in poor locations that are at a distance from their social networks and local services/facilities (i.e. schools).

## Policy HO11: Self-build and Custom build housing

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter 4 Housing*

### **Policy HO11: Self-build and Custom build housing**

1. The Council will keep a register of those seeking to acquire serviced plots in the Borough for their own self-build and custom-build house building. It will also work with stakeholders to explore potential options to identify and bring forward suitable serviced plots; to help meet the needs of self-build and custom-build housing, particularly where this will help increase the delivery of affordable housing and family housing.

2. Development proposals for self-build or custom-build housing will only be supported, providing :

- a).. It meets an identified need for self-build or custom housebuilding as identified on the Harrow self-build and custom housebuilding register
- b). The size mix of units should consider policy X housing size mix and the high priority for increasing the delivery of larger sized family housing (three beds or more) , to address local needs
- c). The scale of proposed development and locations on a site below 0.25ha must comply with the small sites policy (HO3)
- d) It is in accordance with policies relating to matters (such as optimising housing output, high quality design, amenity space, car parking, affordable housing) and other relevant Development Plan Policies

3. Proposals for community-led housing will be supported, (via the self-build and custom build housing or other delivery models), in appropriate locations where:

- a). a local need for this type of provision is clearly established;
- b). optimal use is made of the site, contributing to the delivery of the strategic housing target (including in relation to the mix of unit sizes), with a development density that is appropriate to the site and character of the area, having regard to other policies in the plan;
- c). provision is made for affordable housing; and
- d). the scheme is designed to a high standard (including sustainable design principles), integrates adequate amenity space, and makes a positive contribution to the local neighbourhood.

### **Supporting Text:**

Self-build and custom-build housing are built or commissioned by individuals, or associations of individuals, for their own occupation. This type of development can provide a more affordable route to home ownership than other options available, such as 'built for sale' market housing. Self-build generally refers to people who apply their own skills in the design and construction process or hire professionals for this purpose and manage this. Whereas custom-build involves the outsourcing of industry

professionals, often for bespoke or innovate schemes. For a scheme to be categorised as a self-build or custom build housing, the Council must be satisfied that the initial owner (s) of the home has had primary input into its final design, layout of the house and the completed house will be occupied by the initial owner. Self-build and custom-build housing units provide an additional source of supply of conventional housing and a further housing choice and will therefore be considered as housing in the C3 Use Class for policy implementation.

The Council has a duty under the Self-Build and Custom Housebuilding Act 2015 and Custom Housebuilding (Register) Regulations 2016 to keep a register of those seeking to acquire plots for self-build and custom-build housing in the Borough and to have regard to this register in its planning and housing functions. The register forms part of the Local Plan evidence base. It provides an indication of the demand for serviced plots from individuals or groups who meet specific eligibility criteria. Harrow's self-build and custom housebuilding register is divided into two parts:

- Part 1 keeps track of local demand for self-build and custom housebuilding (i.e. those who meet local connection test) which must be met via the grant of sufficient development permissions for serviced plots of land over a given period.
- Part 2 keeps track of general demand for self-build and custom build, with no requirement to grant sufficient development permissions for serviced plots of land to meet this demand.

Recent amendments to the Self-build and Custom Housebuilding Act 2015 indicates that Local planning authorities must give sufficient permissions for self-build and custom housebuilding on serviced plots to meet the demand for such development in their area over a given period. This means planning permissions only qualify towards meeting demand for self-build and custom build housing, if it was designed for this purpose.

Identifying suitable sites for self-build and custom-build housing in Harrow will remain a challenge with the limited (and often constrained) supply of land to meet the needs of a growing population. To date, there has been limited interest for self-build and custom build housing plots in terms of the number of individuals or association of individuals who have registered an interest in these types of housing delivery. The CIL relief claims data indicates 64 units of self-build housing units were completed between 2016 -24 and no serviced plots for self-build/custom build housing have come forward for development. Key reasons are the Borough is a high land value area with a high level of demand from other house builders, which makes it more difficult to secure funding and less viable to build at lower densities to provide small plots for housing. Further, a large proportion of past supply of new housing has been derived from high density flatted development from the redevelopment of previously developed sites within/close proximity to the town centres or stations, rather than low density housing plots that are more suitable for serviced plots for self-build/custom building housing schemes. As self and custom build homes are regarded by mortgage lenders as non-standard homes, obtaining a mortgage for these can be challenging and therefore this type of development is more reliant on self-financing.

Development proposals for self-build and custom-build housing must use the designed approach to ensure high quality development that responds positively to the locality, optimises the capacity of sites, and supports the delivery of the spatial strategy for the Borough. Applicants should clearly identify whether any elements of the design

may require adaptation or alterations, based on owners' input. This will help the Council to work with applicants to respond to the unique challenges facing self-builders and to ensure schemes are policy compliant. Provision for affordable housing will be required for major development (i.e. 10 or above units) in line with other Local Plan policies.

Community led housing is a growing trend in London, both being driven by Community Groups supported by the Mayor of London (Community Led Housing Hub) and the Council that has been working to bring two community led projects forward. Community led housing can take several forms including housing co-operatives, Community Land Trusts (CLTs), cohousing, and self/custom build housing. These approaches are not mutually exclusive, and in many cases a mixture of approaches may be employed in the setup and running of community led homes to suit specific circumstances. This type of development demonstrates our commitment to seek to meet demand within the borough, and we will continue to monitor our register in line with the relevant statutory requirements.

Community led housing can provide a more affordable route to home ownership and has the potential to build more cohesive communities and allow for specific uses to be explored. There is a demonstrable demand in Harrow to go beyond what the market or the council can deliver in terms of housing affordability and typology.

The Council maintains a brownfield register. This helps identify opportunities for self-build and custom build homes and possibly community led housing schemes on previously developed sites. The supply of self and custom build plots is typically very small scale, usually infill between existing dwellings, vacant/underutilised sites such as garage courts, car parks. In other countries however, groups of self-builders come together to deliver larger schemes, or it is common for service plots to be sold in the market. The Council will consider potential sites for self-build and custom build housing, if they are submitted through the Strategic Housing Land Availability Assessment Call for sites consultation. The Council will monitor the delivery of self-build and custom-build housing, as well as will work with stakeholders to bring forward potential sites, (if opportunities arise), to increase the delivery of affordable housing and family sized housing in order to address local needs.

### **Reasonable Alternatives:**

#### **No alternative approach due to requirements of London Plan and national policy**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives.

## Policy HO12: Gypsy and Traveller Accommodation Needs

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter 4 Housing*

### **Policy HO12: Gypsy and Traveller Accommodation Needs**

1. The Council seek to retain the existing Gypsy and Traveller site, at Watling Farm (0.5ha) to provide three additional pitches, to address future traveller needs, unless evidence shows it is no longer required.
2. The Council will support proposals for Gypsy and Traveller accommodation, including sites and pitches, providing they are of a high-quality layout, design and contribute to meeting identified local needs and there is no capacity at the existing site at Watling Farm.
3. Proposals for new and replacement accommodation must make adequate provision for:
  - a). A suitable and safe access to and from the site, with sufficient space for the manoeuvring of vehicles
  - b). Satisfactory access, parking and servicing arrangements for all vehicles likely to use the site, including emergency services
  - c) basic amenities, including as running water, sewerage/ drainage and waste management
  - d) A site location that is well-integrated into the locality with reasonable access to local shops, services and community facilities including education, health, public transport
  - e) Facilities to serve occupiers of the development, including where appropriate pitches, hardstanding, amenity blocks, and amenity space and play areas
  - f) Appropriate landscaping and planting to address impact on amenity and enable integration of the site with the surrounding environment.
  - g) Measures to minimise any potential impacts on the local environment, including any relevant policy designations for or adjacent to the site that would restrict its use for any type of housing (including but not limited to: Green Belt, Metropolitan Open Land and Sites of Nature Conservation Importance) and the character of the area including visual and amenity considerations
4. Applicants must take account of any potential flood risk and the impacts of climate change when assessing the suitability of a sites,
5. Development proposals for Gypsy and Traveller accommodation must not pose a risk to public health and safety, and not adversely impact the amenity of site occupants and neighbouring properties

### **Supporting Text:**

The National Planning Policy for Traveller Sites (2015), which sits alongside the NPPF, sets out the Government's aim to ensure fair and equal treatment for travellers, in a way that facilitates their traditional and nomadic way of life, whilst respecting the interests of the settled community.

The Harrow Core Strategy included a target to deliver three additional Gypsy and Traveller (G & T) pitches by the end of 2017/18. Three pitches were allocated on the Council Owned site at Watling Farm (2013), but this has permission for 15 pitches (1974). There are two pitches on this site, and it is licenced to a single family and there are also ancillary uses on it (e.g. stables).

London Plan (2021) Policy H14: Gypsy and Traveller Accommodation includes a target to provide 8 Gypsy and Traveller pitches for Harrow, but notes that Boroughs that have undertaken an updated needs assessment (since 2008) can use the figures from this for preparing their Plan.

The Council's most recent evidence base, the West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTANA 2018) found no additional need for new pitches based on the National Planning Policy for Travellers Sites (2015) definition of a traveller for planning purposes, which excludes those who have ceased travelling permanently. The use of this definition has been successfully legally challenged based equality and discrimination grounds (2022), as it excludes travellers who are forced to permanently live in brick/mortar accommodation due to legitimate health, age reasons. In addition, the GTANA indicated a need to provide three additional pitches during the period between 2016 -2033/41 within Harrow based on the London Plan definition for Gypsy and Travellers. This definition includes those households who have permanently ceased to travel. This level of need can be accommodated within the existing allocation. The policy has been drafted based on this broader definition and the associated need figure identified in the West London Alliance GTANA.

The GLA have commissioned external consultants to undertake a London wide GTANA. The final findings of this are expected to be published during 2024.

The Government's Planning Policy for Traveller Sites (PPTS) suggests the use of a criteria-based policy for any unknown households that do provide evidence that they meet the PPTS planning definition. This enables the Council to proactively plan for Gypsy and Travellers' accommodation needs, ensuring that new sites are well designed, well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood. As noted above, the current site has an historic permission for up to 15 pitches, significantly more than current identified needs; it is not envisaged that an additional site will be required during the plan period unless updated evidence indicates insufficient capacity at the existing site.

Any new proposed Gypsy and Traveller sites will need to provide a safe and acceptable living environment; essentially consistent with the characteristics expected of mainstream housing and ideally forming part of a wider balanced and mixed residential community. This includes having good access to social infrastructure to help address recognised disadvantages in relation to educational attainment and health/ life expectancy that members of the Gypsy and Traveller Community have experienced. Nevertheless, there should also be consideration of particular needs such as ability of work vehicles and homes to access the main road network and

facilities that support employment. The Council aims to further Harrows reputation as a place that welcomes diversity. Therefore, the design and layout of Gypsy and Travellers' sites, particularly at their edges, should look to integrate well with its surroundings and promote opportunities for positive interaction with the adjacent townscape and associated communities.

### **Reasonable Alternatives:**

#### **Option 1: Alternative approach would be no policy**

This approach is not considered the preferred option, as it would not be regarded as being in general conformity with the London Plan and national Planning Policy for Traveller Sites. This would also mean that the Council would be less able to manage new accommodation as planning applications would be judged against national planning policy rather than locally specific policy criteria.

#### **Option 2: Include a Policy based on the accommodation need figure identified by utilising the Gypsy and Traveller definition included within the PPTS (2015)**

The definition of Gypsy and Travellers (G & T) included within the PPTS (2015) excludes those who have ceased travelling permanently. Based on this definition, the West London Alliance GTANA (2018) identified no need to provide additional pitches during the period between 2016 -2033/41. The PPTS definition was subsequently successfully legally challenged based equality and discrimination grounds (2022), as it excludes travellers who are forced to permanently live in brick/mortar accommodation due to legitimate health, age reasons. In this context, identifying needs based on the PPTS definition is not the preferred option, but the Council will monitor any Government response to the successful challenge and adjust the approach to the definition and need figure used in the draft Local Plan policy..

The Council is still awaiting the publications of the GLA London wide GTANA and the findings of this in relation to future G & T pitches need, before determining which definition to utilise and need figure to include in the Plan, to address the accommodation needs of the Traveller community. This may result in additional reasonable alternatives.



# **Chapter 05: Local Economy**

## Strategic Policy 04: Local Economy

*Linkages:*

*NPPF Chapter 6: Building a strong, competitive economy*

*Chapter 7. Ensuring the vitality of town centres*

*London Plan Chapter 1: Planning London's Future – Good Growth*

*London Plan Chapter 2: Spatial Development Patterns*

*London Plan Chapter 6: Economy*

### **Strategic Policy 04: Local Economy**

- A. The Council will ensure sufficient employment floorspace is provided to enable a strong and flexible economy that is adaptable to changing circumstances whilst positively contributing to the wider London economy.

#### **Town Centres, Offices and Retail Floorspace**

- B. The Council will support proposals that demonstrably contribute to the vitality and viability of the local economy by:
- a. Supporting appropriate developments and uses that support the role and function of the hierarchy of town centres;
  - b. Continuing to focus appropriate town centre development in the Harrow Metropolitan Town Centre primary shopping area;
  - c. Assisting in meeting the evidenced floorspace needs for the borough across the plan period;
  - d. Providing for a range of uses appropriate to their locations in both size and use class;
  - e. Supporting proposals that are flexible / adaptable to meet appropriate employment uses, and to make best use of space including temporary meanwhile uses;
  - f. Supporting proposals that seek to intensify employment floorspace; and
  - g. Supporting mixed use developments in appropriate locations or where supported by a masterplan approach.

#### **Industrial Land and Premises**

- C. The Council will ensure sufficient provision of industrial floorspace and premises through:
- a. Meeting the identified floorspace need across the borough over the plan period;
  - b. Support intensification, modernisation and, where feasible, the environmental performance of industrial floorspace and premises;
  - c. Prioritise Use Class B2, B8 and related Sui Generis Industrial Uses into Strategic Industrial Land & Locally Significant Industrial Sites; and
  - d. Seek to direct Use Class E(g) (ii) & (iii) activities to appropriate and sustainable locations outside of SIL and LSIS premises.

**Local employment and business opportunities**

- D. Ensure that where possible, new development benefits local business through local labour and supply chain opportunities.

**Supporting Text:**

Across Harrow, employment land is predominately located within designated town centres, local neighbourhood parades, and across industrial land (SIL/LSIS/undesignated sites). These established areas remain the appropriate locations for employment and provide opportunities for residents of Harrow to work locally or set up their own business.

Employment floorspace and how it is used has changed dramatically over the last decade, with changes to shopping habits, such as online purchasing and ease of delivery / returns of goods. This has led to a reduction in the need to physically visit many of the traditional shopping outlets, such as high streets and shopping centres. There has been a notable impact on the way in which town centres are used, and what role they now play in terms of being a destination for retail and leisure. Compounding this, the Coronavirus pandemic exacerbated impacts on struggling businesses which relied upon footfall traffic, and in many cases resulted in business closure. The Harrow Economic Needs Study 2023 however sets out that Harrow Metropolitan Town Centre and Harrow's District Centres have not followed this trend, with vacancies below the national average. However, the churn in shops has been positive in Harrow Metropolitan Town Centre, with new shops outnumbering closures, which again is supported by the vacancy rates noted above.

Given the recent changes set out above, it is not yet possible to fully understand if the short-term impact will continue into the medium and longer term. The Council will continue to monitor changes to the economic climate and the floorspace requirements across the Borough.

Harrow Council has undertaken relevant evidence base work to determine the amount of employment floorspace is required to meet the needs of the Borough to cover the Local Plan period to 2041. The West London Economic Land Review 2021/22 provided an update to the West London Employment Land Evidence (WLELE) Study (2019) sets out an update to the employment projections and resulting land requirements. Specifically, this evidence base relates to industrial employment floorspace, with the projections set out below.

The Harrow Economic Needs Study (ENS) for Town Centres and Offices was completed in December 2023, and provides a quantitative and qualitative assessment of the needs for new retail, leisure and other main town centre uses within the Borough. The report also provides an office market update to the Economic Development Needs Assessment (EDNA) 2017.

The evidence base has set out that over the plan period, the following floorspaces will be required:

- a) Combined retail, food / beverage, leisure and entertainment - 13,900sqm
- b) Industrial – 6,000sqm

Over the plan period the Council will continue to closely monitor and review land supply and demand for all employment floorspace and premises.

## **HARROW TOWN CENTRES**

The Economic Needs Assessment (2023) sets out quantitative and qualitative assessment of the need for new retail, leisure and other main town centre uses within LB Harrow, which will meet the needs across the plan period to 2041. It also provides an office market update to the EDNA (2017), in particular the commercial property market conditions of the office market and employment land availability. This includes an assessment of current office market conditions within Harrow, London and national markets more widely, and a reappraisal of floorspace and land supply to determine an updated demand/supply balance position.

Town centre employment floorspaces can provide opportunities for multiple occupiers over a 24hr period. Some uses that operate during the day, may be in a position to operate as a different use into the evening. Where this is practical, it can contribute to businesses sharing some of the costs associated with running a business. By supporting this, further footfall and dwell time is encouraged into town centres, whereby potentially contributing to the vitality and viability of the centre. Where planning permission is required for any change of use, planning statements supporting any application must set out clearly separate uses within the space and how they would be managed.

In September 2020 the Government made significant changes to the Use Class Order, which resulted in formerly separate use classes being merged into a single class ('E Use Class's). Of specific note E Use Class now includes uses that were formerly in separate use classes, such as retail, financial & professional services, medical, indoor recreation, office, research & development, and light industrial. These changes how employment land is managed and represents a shift away from traditional retail dominant areas. Notwithstanding this, town centres will remain a focal point for retail and an area where footfall is encouraged with a range of experiences for the local community to visit and spend time in.

The development of experiential retail is likely to be essential to the longer-term sustainability of many town centres. This typology requires visits to a physical space rather than online purchasing and requires more interaction with the town centre. The Local Plan provides a flexible approach to use classes within the town centre locations, setting out that main town centres uses [footnote NPPF] are appropriate.

The vacant units across Harrow's town centres are likely to be capable of accommodating floorspace need. The amount of vacant floorspace across the designated town centres equates to approximately 14,000sqm, and with an average vacancy rate of 6% (significantly below the UK average of 14.5%), the projected demand can theoretically be met. In the event that the Borough's shop unit vacancy rate was to reduce to around 4%, this reduction in the shop unit vacancy rate could still theoretically accommodate over 10,000sqm of new uses, exceeding the projected combined retail and food/beverage floorspace under-supply up to 2036 (8,500sqm gross).

In Harrow, the demand for office space has continued to decline since the pandemic, while availability of leasable space has risen in tandem.

There has been a significant reduction in office space in the borough, and whilst there is no evidential need for further office space, any further release of office space must be managed to ensure sufficient floorspace is retained. This policy seeks to ensure that whilst there is flexibility and adaptability of floorspace to allow for vitality and vibrancy of town centres, ensuring a mix of uses is also critical, including the provision of office space. To achieve this, policy will provide a sequential approach to office space release. This will ensure that existing office space located within appropriate locations is retained, unless it can be demonstrated as being surplus to requirement and therefore able to be released.

To ensure that new town centre uses are delivered within the right locations, a sequential test will be required for schemes that propose such uses outside of town centres. A Retail Impact Assessment will also be required to support proposals, to ensure that they would not be harmful to the vitality and vibrancy of centres. Paragraph 90 of The National Planning Policy Framework (2021) sets out that out of centre retail should be supported by a Retail Impact Assessment for any schemes of 2,500sqm, where there is no locally set threshold. The Harrow ENS (2023) recommends a threshold of 400sqm for all out of centre retail and leisure uses. The reason for the lower threshold is that the NPPF minimum threshold of 2,500sqm gross may be an inappropriate threshold for LB Harrow because this scale of development would exceed the overall long-term retail/food beverage projections for all zones in the Borough. The lower retail capacity projections and uncertainties about the cost-of-living crisis suggest town centres are now more vulnerable to out-of-centre developments.

## **INDUSTRIAL LAND**

The West London Economic Land Review (2019), and the 2021 update provided West London and Harrow specific evidence for industrial land. The London Borough of Harrow is identified as having the smallest quantum of industrial land in West London and has proportionally lost the most over the last previous plan period. Between 2000/01 and 2019/20 Harrow has seen a 143,000 sqm decline in industrial floorspace. The emergence of new industrial floorspace demands (such as data centres and distribution hubs to support online retailing) and the greater than anticipated loss of industrial floorspace means that Harrow must retain industrial land; many other parts of London are in a similar position.

Harrow's logistical infrastructure including the highway and rail network is not strategically well linked to inner London, Heathrow or areas outside London. For this reason, it is not an attractive location for large floorplate industrial or logistics operators. Traditionally, industrial floorspace in Harrow has been for small to medium size enterprise, a trend that is likely to continue given the above constraints in relation to access, land holdings and age of stock. Industrial vacancy rates within Harrow have remained low, at around 1.7%, and has done so since 2018. This vacancy rate is much lower than both the England and London average indicating an undersupply of industrial floorspace in the borough.

Going forward, Harrow should seek to protect its existing industrial spaces and seek renewal and the provision of new quality premises where possible.

Uses that are still industrial and fall within Use Class E(g)(ii) and (iii) (research and development, and industrial processes respectively) are capable of being located in close proximity to more sensitive uses, such as residential or town centres, these uses

will be directed towards town centres rather than SIL / LSIS areas. Such uses can reasonably be expected to be located outside of designated industrial areas, where nuisance causing activities are able to lawfully be undertaken, and which are more difficult to locate elsewhere within the borough.

Policy E4 (Land for industry, logistic and services to support London's economic function) of the London Plan (2021) provides a list of appropriate industrial uses that provision should be made for in terms of operational requirements. These should be provided and maintained taking into account strategic and local employment land reviews and industrial land audits. Based on the up-to-date evidence, to meet the evidenced need for industrial land and premises, Harrow is not in a position to release any land from its industrial stock.

The up-to-date evidence base sets out that Harrow has a very modest stock of industrial premises comprising modest sized buildings and land holdings in comparatively small industrial estates. Whilst there are very low vacancy rates, premises are generally poor in quality and with low rent levels. Furthermore, given these challenges and poor strategic highway and rail network links, delivering a meaningful increase of floorspace and premises remains difficult. By reason of this, the Council will seek to ensure that the designated industrial land across the borough (SIL & LSIS) are protected, and their use is primarily for Use Class B2 and B8, and for Sui Generis uses that can be satisfactorily demonstrated as being suitable for these locations.

Whilst Policy E4 (Land for industry, logistic and services to support London's economic function) of the London Plan (2021) sets out that (former) B1c (light industry) is appropriate within industrial sites, this use is also suitable in principle to be located within more sensitive locations, such as town centres and / or residential areas. With Use Class E(g) (ii) & (iii) being directed outside of SIL and LSIS, this allows more availability of land and premises for the heavier industries that fall within use class B2 and B8 or what can be demonstrated as similar in terms of requirements and impacts.

Uses that fall within E(g) (ii) & (iii) are appropriate on non-designated industrial land and are able to be located within town centre locations and in close proximity to residential. However, in exceptional circumstances Use Class E(g) (ii) & (iii) may be appropriate, however will need to demonstrate acceptability within the SIL / LSIS and how it a use would contribute to the SIL / LSIS and not remove viable Use Class B2 or B8 from the boroughs stock within a protected industrial site.

Where planning permission is required for employment uses, the use of planning conditions will be used to ensure that employment floorspace is retained and not lost through potential permitted development.

New development should support local employment, skills development, apprenticeships and other training initiatives. The Council's Economic Development team provides a programme to support developers to provide opportunities for residents to gain construction employment on major developments. Utilising local suppliers where possible ensure that local business is able to take advantage of the economic benefits of new development, and also ensure that delivery of goods and services are minimised from a transportation perspective. Where appropriate, planning obligations (through S.106 agreements) will be used to secure appropriate contributions.

**Reasonable Alternatives:**

The NPPF / London Plan requires a policy to be included within the Local Plan; not including a policy would therefore be inconsistent with national policy and / or not in general conformity with the London Plan.

## Strategic Policy 05: Harrow & Wealdstone Opportunity Area

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter XX:*

### Strategic Policy 05: Harrow & Wealdstone Opportunity Area

The Harrow & Wealdstone Opportunity Area comprises three distinct areas: Harrow Metropolitan Town Centre and surrounding area, Station Road, and Wealdstone District Town Centre and surrounding area (refer to Map XX). Each of these areas have a distinct character and serve different functions. The Council will support new development that responds to the specific characteristics and intended function of each of the areas.

- A. The Council will direct and support development within the Harrow & Wealdstone Opportunity Area, where it assists in the growth and regeneration of the Area, and delivers against the growth potential identified in the London Plan (2021) through:
- a. Supporting the delivery of a minimum 5000 well designed homes that achieve the homes needed across the Opportunity Area:
  - b. Supporting the delivery of a minimum 1000 jobs into the Opportunity Area, supporting employment floorspace to meet the evidenced needs of the borough and wider West London sub-region;
  - c. Supporting the intensification and modernisation of existing employment and industrial floorspace, consistent with policy LE3 Industrial Land;
  - d. Ensuring new development respects heritage assets;
  - e. Working with strategic partners to deliver more sustainable transport modes to serve the Opportunity Area, wider borough and sub-region;
  - f. Working with strategic partners and funding bodies to assist in the delivery of essential infrastructure to support new development across the Opportunity Area.
- B. The Council will seek to support comprehensive development where it meets the policies of the wider development plan, and where relevant, masterplans that have been prepared for each of the sub-areas.
- C. The Council will ensure that development within areas of the Opportunity Area that are not capable of facilitating significant change (such as those outside town centres and allocated sites) remain appropriate to its location.

### Harrow Metropolitan Town Centre

- D. Harrow Town Centre is classified as a Metropolitan Town Centre, the Council will support proposals that strengthen this classification, and where they:



- a. Reinforce the St Ann's Road, Station Road and the St George's and St Ann's primary shopping areas as the focal point for new appropriate town centre development;
- b. Reinforce the centre as a primary location for office, retail, evening and night-time economy, and leisure use within the borough and prioritise experiential uses to increase footfall and dwell time;
- c. Provide flexible floorspace / premises that allows for multiple uses that can contribute to both daytime and night-time economies;
- d. Include mixed use schemes incorporating appropriate ground floor commercial uses with active frontages;
- e. Improve the pedestrian connectivity and environment throughout the Metropolitan Centre;
- f. Provide appropriate levels of car parking, including Electric Vehicle charging points; and
- g. Support improvements to sustainable transport connections to the wider borough;

E. Proposals that fail to comply with the above will be resisted.

F. New development must address the principles and objectives within the Harrow Town Centre Masterplan.

### **Station Road**

- G. Development along Station Road linking Wealdstone District Centre and Harrow Metropolitan Town Centre must make a positive contribution to its environment and identity. Proposals should;
- a. Be of a massing, bulk, scale and a high-quality design that optimises land, consistent with the sub-areas inclusion within the broader Opportunity Area (being a designated area suitable for substantial change), whilst ensuring a satisfactory relationship with the surrounding suburban character area which is a much lower density;
  - b. Provide active, viable and serviceable non-residential ground floor frontages;
  - c. Contribute to planned improvements to the public realm and road junctions, including the creation of a green boulevard, which improves the environment and active transport linkages between the two centres; and

### **Wealdstone District Town Centre**

- F. Development with the Wealdstone Town Centre will be required to strengthen the vibrancy and vitality of the district centre and improve the environment and identity of Wealdstone as a location for business, industrial activity and family living. Proposals will be supported where they:
- a. Are of a massing, bulk, scale and a high design that optimises land within an area designated suitable for substantial change, whilst ensuring a satisfactory relationship with the surrounding low density suburban character;

- b. Contribute to planned improvements to the public realm. Specifically, improvements to the Harrow & Wealdstone Rail & Underground Station and surrounds to overcome perceptions of crime and poor safety, and to respond to the climate change emergency (including flooding) and for safe and efficient pedestrian and cycle use;
- c. Improve sustainable movement connections from Wealdstone Town Centre to the planned regeneration developments and large scale allocated sites within the vicinity of the town centre;
- d. Provide a design that respects, and reinforces the centre's heritage and character in relation to architecture, streetscape, road layout and its relationship with the wider suburban character area; and
- e. Modernise and intensify Wealdstone Industrial Land and Premises across all levels of the industrial land hierarchy (see Policy LE3 Industrial Land);

### Supporting Text

Opportunity Areas are identified under the London Plan as significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. The Harrow and Wealdstone Opportunity Area offers significant opportunity for urban renewal and intensification, providing the impetus to regenerate Wealdstone and strengthen Harrow town centre. Capacity exists to deliver substantial employment growth through an uplift in retail, office and hotel development within the town centres and the intensification of industrial and other business uses within the Wealdstone Area. Under the previous Local Plan, a significant amount of Strategic Industrial Land was released with the closure of the Kodak site. There is scope to accommodate a substantial portion of the Borough's future housing need through the delivery of higher density residential and mixed-use development on key strategic sites where development is matched by investment in infrastructure and achieves a high standard of design.

The London Plan (2021) requires the Harrow & Wealdstone Opportunity Area to secure a minimum of 5000 homes and 1000 jobs over the plan period. Strategically, the Council will seek to deliver a minimum of 7,500 homes on permitted and allocated sites due to the highly sustainable location and the for the capacity to accept a higher density of development (see **Policy XXX**). The Opportunity Area has a significant proportion of town centre employment floorspace, which will be retained, and where possible deliver new floorspace. Retaining or re-providing the existing uses within all industrial sites, especially where heavy industry (B2 / B8 or similar Sui Generis Use) is currently occupying the site is encouraged. This approach will seek to optimise the employment space available within the Opportunity Area and assist in the delivery of a minimum of 1000 jobs within the Opportunity Area. The Council will seek to deliver the minimum homes and jobs required by the London Plan (2021) and will work with strategic partners in conjunction with the use of the Community Infrastructure Levy to ensure that there are sufficient infrastructure improvements to support the anticipated new development.

The Council will look to deliver Masterplans for town centres and key areas across Harrow where appropriate, and where this applies to the Opportunity Area, new development will be expected to come forward.

### **Opportunity Area**

The Harrow & Wealdstone Opportunity Area is an irregular shape and comprises three distinct areas, the Harrow Metropolitan Town Centre and surrounding area, the Wealdstone District Centre and surrounding area, and the Station Road area which links the two town centres. Immediately abutting the Opportunity Area is suburban Harrow which has a strong two storey residential character. This change in character is very distinct, and care must be taken to ensure that the two-character areas respond appropriately to one another.

Harrow Metropolitan Town Centre is characterised as the most densely developed area in the borough (with scope for further intensification), and is the primary location for retailing, office, leisure and other (non-industrial) employment uses. The built form of the town centre has the highest concentration of taller buildings within the borough, and combined with its highly sustainable location, will remain the key location for new development.

Station Road links Harrow Metropolitan Town Centre with district town centre of Wealdstone and is characterised as a mixed-use corridor between the two centres. This part of the Opportunity Area is a relatively narrow awkward shape characterised by commercial units on the western side of Station Road with some larger sites, whereas the eastern side has some industrial sites and with residential units facing onto Station Road.

The character of Wealdstone Town Centre and surrounds is much more varied. This includes the district town centre, Strategic Industrial Land, Local Strategic Industrial Sites (estates), large comprehensive regeneration developments and also well-established Metroland character housing. New development within the Wealdstone Town Centre Area must be cognisant of the variations within the character of the area, ensuring that any interface of character areas is respected.

Not all locations across the Opportunity Area will be capable of accommodating growth equally. The Harrow & Wealdstone Opportunity Area includes three main character areas. Each of these character areas are further comprised of sub areas, which have their own considerations in terms of facilitating new development. The town centre locations within the Opportunity Area will remain the location for higher density development, outside of these, site allocations will provide guidance for sites where significant development is sought (sites such as Kodak, former Civic Centre, and Byron Park / harrow Leisure Centre). New development should reflect the Public Transport Accessibility Level (PTAL) across the Opportunity Area, which will vary across each of the areas. Outside of these identified areas, new development must be delivered in accordance with the wider development policies.

### **Harrow Metropolitan Town Centre**

Harrow Town Centre is classified as a Metropolitan centre<sup>[footnote]</sup> in the London Plan and will remain the focal point for new development to strengthen the classification. Harrow Town Centre has excellent Public Transport Accessibility Levels, providing

train services into London out along the Chilterns Railway. Buses serve the centre and provide access across the remainder of the borough and beyond. High quality development introduces appropriate town centre uses and sizes that are able to contribute to the economy will be supported. In order to strengthen the metropolitan status of Harrow Town Centre, the Council will support site assembly to bring forward comprehensive development where appropriate.

The design and use class of new development must reflect and reinforce the town centre's status in the London context. In addition to the intensity, bulk and scale of development, the design and quality should reinforce the centre's future as a modern, thriving place. Bland and unresponsive design is unlikely to strengthen Harrow town centre's character and appearance, nor contribute to the creation of a distinctive, identifiable place. New floor space must be flexible and adaptive to ensure maximum flexibility within the current economic climate, and any other changes which may present further challenges to the economy.

Through new development and planned public realm improvements, the Council will seek to improve wayfinding and to better define legibility and the centre area within Harrow town centre. Specifically, the St Ann's Road, Station Road and the St George's and St Ann's Shopping Centres will remain the primary focal point for shopping areas, and where new appropriate town centre development will be directed to.

The council will continue to work with Transport for London to improve access to and from the Metropolitan Town Centre across the borough, specifically seeking to deliver sustainable methods of transport for residents and visitors to utilise. Improving sustainable transport will reduce the amount of vehicle movements improving climate change matters, air quality and also a move towards a less car dominated centre where pedestrians are more comfortable.

### **Station Road**

Station Road lacks a distinctive identity, other than a transportation route linking Harrow Town Centre and Wealdstone Town Centre. However, this link is a poor environment for pedestrians due to heavy vehicular traffic. The Station Road section of the Opportunity Area is relatively narrow, with a mixture of character ranging from two-storey dwellings to higher four storeys in places. Beyond the majority of premises fronting Station Road, the character promptly changes into two-storey suburban character. This relationship between the Opportunity Area and the wider suburban character creates constraints and challenges to realising significant change along much of the Station Road element. Some specific sites with larger land holdings do provide opportunities and will be subject to site allocations as identified within the policy maps. All new proposals will need to demonstrate how a site is able to optimise development whilst ensuring that the interface between a more densely developed location and a strong suburban character of lower height and density.

The policy seeks to realise the potential that exists, through redevelopment, to provide an active frontage along both sides of the road, to improve the continuity of building lines, reduce the presence of unsightly and unused forecourts, and to provide a more coherent street scene. A simple, uncomplicated but modern design, exhibiting quality external finishing will achieve a coherence between different developments and existing buildings along the Station Road frontage.

The Council and its partners are committed to improving the public realm of Station Road. Funds raised through the Harrow Community Infrastructure Levy, together with any site-specific requirements made available as a result of Planning Obligations, will be used and co-ordinated to deliver safe, accessible and legible surfaces and the creation of a green, tree-lined boulevard which benefit pedestrians, cyclists and bus users. On sites that create new public realm, a consistent finish will assist in a seamless connection with the planned or delivered improvements along the remainder of Station Road, and again aid in providing much needed continuity.

### **Wealdstone Town Centre**

Wealdstone is classified as a district centre within the London Plan, which also notes the centre has having a low commercial growth potential but a high residential growth potential. Wealdstone is primarily served by the Harrow & Wealdstone Train and Underground Station, which provides mainline trains from London Euston northwards out of London. Bakerloo and London overground between London Euston and Watford Junction.

Over the last plan period, significant investment has occurred in the Wealdstone Town Centre. Specifically, new residentially led developments and public realm improvements have been implemented within the area. Wealdstone provides employment space, through both Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS) industrial sites.

New developments have delivered a significant number of homes into the Opportunity Area, with further development potential on several large sites. These developments have and will continue to assist in meeting the housing targets set for the borough. Development within the Wealdstone Town Centre provides for higher density developments that result in more noticeable change within the area. Nearer the edges of this part of the Opportunity Area, and further away from the more densely developed town centre, existing developments such as Kodak and earmarked development at Byron Corner, are adjacent to the strong suburban character of Metroland Harrow. Developments in these locations needs to ensure that design responds to the character of the area, and specifically where new development is sought to be brought forward where two distinct character areas adjoin, care needs to be taken to ensure both character areas are respected.

Within the Wealdstone area, both LSIS and non-designated industrial land provide valuable contributions to the remaining industrial stock of the borough, and the retention of these sites, or modernisation where appropriate will assist in delivering employment opportunities within the locality and borough. Any release of industrial land regardless of protection under the development plan, will be considered against the most up-to-date evidence.

Wealdstone has perceived crime and security issues worsened by the poor-quality public realm. Whilst improvements within Wealdstone Town Centre have been made to the public realm through Transport for London funded projects, further improvements will be supported where they assist in achieving the wider policies of the development plan. With new development the opportunity to improve the public realm presents itself, along with planned infrastructure improvements.

**Reasonable Alternatives:**

The NPPF / London Plan requires a policy to be included within the Local Plan; not including a policy would therefore be inconsistent with national policy and / or not in general conformity with the London Plan.

## Policy LE1 Development Principles & Town Centre Hierarchy

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter XX:*

### **Policy LE1 Development Principles & Town Centre Hierarchy**

The council will support developments that ensure an appropriate mix of main town centres uses, or that demonstrably contribute to the vitality and vibrancy of the centre or parade.

- A. The Council will support town centre developments that:
  - a. Demonstrably contribute to the vitality and vibrancy of the town centre or parade;
  - b. Are of a scale and intensity commensurate to the size and role of the centre or parade it is located within;
  - c. Provides an appropriate mix of uses within a shopping area or parade, ensuring an over proliferation of Sui Generis uses does not occur;
  - d. The ground floor would have an accessible and active frontage; and
  - e. Community facilities in town centres are able to be supported by the Council where compliant with Policy CI1.
- B. The Council will support mixed-use developments in town centres and parades where:
  - a. The ground floor element complies with A;
  - b. There is a clear and satisfactory delineation of access and servicing arrangements (bin store, cycle storage) between the two uses; and
  - c. Satisfactory mitigation in accordance with the Agent of Change (Policy D13 of the London Plan (2021)).
- C. Residential uses on the ground floor in any town centres or neighbourhood parades will not be supported.
- D. The loss of appropriate town centre uses, community facilities and infrastructure from town centres will not be supported unless compliance with policy CI1 is demonstrated.
- E. Temporary events such as markets and entertainment uses will be supported where:
  - a. They are supported with a management plan agreed by the Council; and
  - b. They do not impact on residential amenity or highway safety.
- F. The Council will resist the loss of any employment, leisure or cultural uses within a neighbourhood parade that provides essential day to day amenities. The loss of such uses will only be accepted where adequate marketing has been undertaken.

- G. Proposals for new retail, leisure and cultural development in out of centre locations will be resisted. Any such out of centre developments must;
- a. Undertake a sequential test to demonstrate that there are no appropriate town centre sites, followed by edge of centre sites;
  - b. Be supported by an Impact Assessment for proposals where the floorspace exceeds 400 square meters to demonstrate no harm to centres within their catchment.
  - c. Be supported by a Green Travel Plan to enhance sustainable access between the site and the town centre network
- H. The release of office floorspace will be supported where the sequential approach below has been applied in the following order:
- a. Vacant floorspace outside of designated town centres;
  - b. Vacant floorspace within designated Major, District or Local Town Centres.
  - c. Poor quality floorspace within designated Major, District or Local Town Centres; and
  - d. Floorspace within the Harrow Metropolitan Town Centre;
- H.1 Where the building has been vacant for more than 12 months and there is genuine evidence that all opportunities to re-let the accommodation have been fully explored, including evidence of suitable marketing over a 12-month period for office use or other appropriate employment or community uses.

### Supporting Text

Outside of the Harrow & Wealdstone Opportunity Area, the Borough's network of town centres comprises: part of one major centre (Footnote); eight district centres (Footnote); and five local centres (Footnote). Town centres form a central part of the London Plan's spatial strategy for outer London and are at the heart of Harrow's spatial strategy for areas of the Borough beyond the Harrow & Wealdstone Opportunity Area. They give Harrow's districts their sense of individual identity and provide basis for sustainable urban living, being inextricably connected with the public transport network. As the demographics and retail behaviour of residents has evolved, the character of the Borough's centres has changed and many now have a complimentary rather than principal role in meeting residents' shopping needs. Nevertheless, they still have a role; it therefore remains important to sustain and where possible enhance the vitality and viability of the Borough's town centres.

Harrow's network of town centres and their classifications are well established. Local parades of shops supplement the capacity of town centres by providing small walk-to convenience shops and facilities that serve the neighbourhood in which they are situated. A total of 34 Neighbourhood Parades have been identified within Harrow and are an important part of the Borough's suburban fabric playing an important role in the day to day living of residents, particularly within the suburban areas of Harrow.

The Harrow Economic Needs Study (2023) (ENS (2023)) provides an updated appraisal of town centre economic uses initially set out in the Economic development Needs Assessment (2017), setting out the significant changes that have occurred over this timeframe and the impact that this has had on town centres generally across



London, and in Harrow. It has undertaken a quantitative and qualitative assessment of the need for new retail, leisure and other main town centre uses within LB Harrow.

Across the Local Plan period (to 2041), the floorspace projections are as follows;

- 1) Combined retail, food /beverage, leisure and entertainment: 13,900sqm
  - a) Retail (Convenience & Comparison): 800sqm
  - b) Food and Beverage; 13,100sqm

The ENS (2023) did not provide an office floorspace requirement for the borough. However, it did set a trend-based projection, noting that whilst there is still sufficient office floorspace capacity across the borough, there has been significant loss of office floorspace. Given there has been notable losses of floorspace across the borough (predominantly through the Prior Approval Process converting to residential), the Council will continue to closely monitor and review land supply and demand for all employment floorspace and premises.

This policy sets out how the above floorspace requirements for the Borough across the plan period (to 2041) will be achieved, and how the Council will ensure that the vitality and vibrancy of each the centres and parades.

Town Centres have come under intense pressure to remain relevant and viable. Online shopping, the cost-of-living crisis and Coronavirus have all placed immense pressure on town centre occupiers to remain viable, with many operators shutting down. Managing the use of premises within a town centre has become more challenging with the amendment to the Town and Country Planning (Use Class) order 1987 in September 2020. The amendment introduced the E Use Class which allowed for greater movement between different uses within this class than previously.

The Council will continue to monitor the use of premises within the designated town centres and parades and will explore and seek to implement where considered appropriate the use of Article 4 Directions to ensure the vibrancy and vitality of town centres and parades.

Whilst retail will remain a key use class within a town centre, there has been a clear shift in how town centres are used and how they are experienced. This policy seeks to ensure that new development is located within the right locations and is flexible and adaptive to ensure resilience for town centre uses to adapt to changing economic conditions. All new development must demonstrate how it will positively contribute to the vitality and vibrancy of the centre.

The aim of this policy is to provide clear support for retail, leisure and cultural development or extensions within appropriate town centres. For those centres with multiple functions, the primary shopping area has been defined on the Policies Map and should be the focus for retail development. Sites within the primary shopping areas, as defined on the Policies Map, or those within 300 metres of the primary shopping area, or those falling anywhere within the boundary of other town centres, represent the sequentially preferable locations for retail, leisure and cultural development or extensions. Where the use and scale of the development is appropriate to the town centre, applications on the sequentially preferable sites need not provide information on site search and selection.

Temporary events and markets provide a point of difference to the experiential offer of a centre or parade and can provide a reason for people to visit a centre or parade positively benefiting the vitality and vibrancy of the wider locality. Temporary events are able to make use of vacant premises, which may be through existing built stock or as part of a new build scheme. Major schemes should set out in an agreed vacancy strategy how space is able to be used for temporary events or meanwhile uses.

Traditionally market events occur outdoors, the Council will work with market Operators and town centre managers to assist in bringing these forwards in the appropriate locations. Operators will need to ensure that management plans for temporary market uses have been agreed with the Council prior to such events being held. Management plans must demonstrate that events will not be harmful to residential amenity or the highway network. Locating temporary markets in highly sustainable locations is encouraged to ensure ease of transport to and from the event in a sustainable manner.

Neighbourhood parades are located outside of the designated town centres and provide a valuable resource for much of suburban Harrow. Neighbourhood parades have the ability to provide day-to-day amenities contributing to sustainable neighbourhoods and assisting in the modal shift to more sustainable transport modes. The loss of these assets across the borough result in residents needing to travel further to collect day to day convenience goods, which can lead to further use of the private motor vehicle, especially from parts of the borough less connected to public transport. The loss of employment, cultural or leisure uses from such a location will only be supported where there has been 24 months of appropriate marketing, and alternative non-residential uses have been explored.

Residential use is a more permanent use within a site, with the ability to return a premise to a non-residential use highly unlikely to occur. Residential uses at ground floor within neighbourhood parades will not be supported, as this sends the clearest signal that the parade is in decline and all attempts to revive it have been abandoned.

New out of centre retail, leisure and cultural development or extensions to existing pose the greatest potential threat to the viability and vitality of town centres. These proposals can compete with town centres, particularly where they involve comparable goods retailing, and often reinforce car dependent behaviour. Attention will also be paid to the format and scale of the proposed development to consider whether sufficient flexibility has been exercised in the assessment of how other sequentially more preferable sites could meet any identified need.

Proposals should undertake a comprehensive sequential test of the borough to identify a preferable site, which should include reviewing town centre locations followed by edge of centre locations. Where developments are near an administrative boundary with a neighbouring borough, sites within that borough in sequentially preferable locations may be required as well.

Where a sequential test has been agreed with the Local Planning Authority and an out of centre site has been demonstrated as they are only sequentially preferable site, any sites that exceed 400sqm (gross floorspace) require an Impact Assessment. Any such assessment shall be carried out in accordance with the National Planning Policy Framework (2021) (or any superseding framework). This should include assessment of:

- a) The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- b) The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

The office stock across Harrow has been in steady decline over the previous plan period, much of which has been lost to residential use through the prior approval process. This has resulted in much of the older stock being released. The Harrow ENS (2023) has identified an oversupply of office space, notwithstanding the release over the previous plan period. The Council will continue to monitor and manage the release of office floorspace to ensure that a sufficient supply remains in the event that further office space is likely to be released beyond what has been forecasted.

In managing the release of office floorspace from the Borough's stock, Policy LE 1 (Development Principles & Town Centre Hierarchy) sets out a sequential approach, with office floorspace located outside of designated town centres more sequentially preferable to be released than floorspace released which is located within town centres, specifically the Harrow Metropolitan Town Centre. Development proposals should firstly seek to release office floorspace that is vacant and has been for at least 12 months. Applications must be supported with appropriate marketing to demonstrate that all reasonable efforts have been to let the space. Applications are expected to consider other employment or community uses before release to residential is pursued.

Marketing undertaken as required by this policy must be robust and proportionate and cover a period of no less than 12 months. In most instances marketing will be tested independently by a suitably qualified professional.

### **Footnotes for town centre hierarchy**

**Metropolitan centres** – serve wide catchments which can extend over several boroughs and into parts of the Wider South East. Typically, they contain at least 100,000 sqm of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods. These centres generally have very good accessibility and significant employment, service and leisure functions. Many have important clusters of civic, public and historic buildings

**Major centres** – typically found in inner and some parts of outer London with a borough-wide catchment. They generally contain over 50,000 sqm of retail, leisure and service floorspace with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service and civic functions

**District centres** – distributed more widely than Metropolitan and Major centres, providing convenience goods and services, and social infrastructure for more local communities and accessible by public transport, walking and cycling. Typically, they contain 5,000–50,000 sqm of retail, leisure and service floorspace. Some District centres have developed specialist shopping functions

**Local and Neighbourhood centres** – typically serve a localised catchment often most accessible by walking and cycling and include local parades and small clusters

of shops, mostly for convenience goods and other services. They may include a small supermarket (typically up to around 500 sqm), sub-post office, pharmacy, laundrette and other useful local services. Together with District centres they can play a key role in addressing areas deficient in local retail and other services. This includes locally-identified CAZ retail clusters.

### **Reasonable Alternatives:**

**Option 1: Less restrictive policy.** An alternative policy for LE1 could be a ‘laissez-faire’ approach, which would be not seek to control or protect main town centre uses, rather leaving the market to determine the appropriate mix is uses within the town centres. However, failing to manage and ensure appropriate main town centre uses may detrimentally impact on the vitality and vibrancy of town centres, which is one of the key outcomes sought by the Local Plan. Such and approach is therefore not the preferred option.

An alternative that was considered was for Policy LE1 to seek to provide a more restrictive approach to town centre uses (than that proposed), similar to the current local plan policy, requiring a percentage cap of non-retail uses within the town centres / shopping parades. This could also include ensuring that there would not be more than three non-retail units in a row. However, by reason of the introduction of new Use Class Order (September 2020) and the new E Use Class incorporated a number of previously separate use classes there is a much wider number of uses that are able to changed from retail, without the need for planning permission (ie; does not constitute development and therefore any restrictive policy would not apply). As such, seeking to control the proportion of specific uses in town centres (rather than the preferred approach of focusing on outcomes such as the contribution of a proposal (where permission is required) to vibrancy and vitality would not be deliverable within a local plan policy. This is therefore not a reasonable alternative.

## Policy LE2 Night-time and Evening Economy

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter XX:*

### **Policy LE2 Night-time and Evening Economy**

- A Within the Harrow Metropolitan Town Centre, proposals which enhance the evening and night-time economy will be supported where:
- a. They make a positive contribution to the vitality and vibrancy of the centre;
  - b. They satisfactorily mitigate any negative parking or traffic implications;
  - c. They appropriately address the agent of change principle as set out in Policy D13 of The London Plan (2021);
  - d. They demonstrate that the evening or night-time use will provide an active frontage during daytime hours; and
  - e. They satisfy the principles set out within the Harrow Metropolitan Town Centre Masterplan.
- B. Proposals which enhance the evening economy of town centres outside of the Metropolitan Town Centre will be supported with regard to:
- a. The role and function of the centre;
  - b. Their positive contribution to the vitality and vibrancy of the centre;
  - c. The satisfactory mitigation of any negative parking or traffic implications; and
  - d. The agent of change principle as set out in Policy D13 of The London Plan (2021).
- B.1 Proposals should demonstrate evening or night-time uses will remain active during daytime hours where possible.
- C. Proposals for the redevelopment of night-time or evening economy use to provide a mixed-use scheme will be supported where:
- a. There is a sufficient reprovision of the existing floorspace;
  - b. Adequate separation of access and servicing between the different uses is achieved;
  - c. The agent of change principle as set out in Policy D13 of The London Plan (2021) has been addressed; and
  - d. Wider policies within the development plan are complied with.
- D. Proposals that would compromise any component of this policy, or would be detrimental to the vitality and viability of town centres, will be refused.

- E. The loss of facilities that contribute to the evening and night-time economy will be resisted unless;
- a. Appropriate marketing of no less than 24 months to demonstrate they are surplus to requirement; or
  - b. There are suitable facilities within the centre that adequately provide for this use.

### **Supporting Text**

The night-time economy is an important element of the overall economy of an area, and specifically relates to activity between the hours of 6pm and 6am. Specifically, this also includes uses that are associated within the evening hours. Night-time economic activities include eating, drinking, entertainment, shopping and spectator sports, as well as hospitality, cleaning, wholesale and distribution, transport and medical services, which employ a large number of night-time workers.

Generally speaking, Harrow does not have a well-developed night-time economy. The primary reason for this is the proximity into central London and the greater selection of options for eating, drinking, leisure and cultural activities. However, with a growing population in the Harrow Metropolitan Centre and the cost of returning to Harrow late in the night can be time consuming and expensive, there is an opportunity to increase the offer for residents and visitors. Within Harrow, the Metropolitan Centre provides the optimal location for opening hours that are more unsociable and associated with late night uses such as clubs and restaurants. Harrow Metropolitan Town Centre has a London Plan (2021) night-time economy classification of NT2, which places it as an area of regional or sub-regional significance.

The Council intends to produce a masterplan for the Metropolitan Town Centre, setting out where land uses, including night-time and evening economy, would be best directed to across the town centre.

### **Reasonable Alternative:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy LE3 Industrial Land

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter XX:*

### **Policy LE3 Industrial Land**

The Council will support new development of industrial floorspace within appropriate locations, where they accord with other relevant policies within the development plan.

#### **A. Strategic Industrial Locations (SIL)**

- a. Proposals to intensify, increase or modernise floorspace and premises within SIL will be supported where the uses fall within the industrial-type activities below;
    - 1) General Industry (B2) and similar Sui Generis uses
    - 2) Storage and logistics/distribution (Use Class B8)
    - 3) Secondary materials, waste management and aggregates
    - 4) Utilities infrastructure (such as energy and water)
    - 5) Land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure
    - 6) Wholesale markets
    - 7) Emerging industrial-related sectors
    - 8) Flexible (B2/B8) hybrid space to accommodate services
    - 9) Low-cost industrial and related space for micro, small and medium-sized enterprises
  - b. New & emerging industrial uses must demonstrate operational compatibility with the wider SIL.
  - c. Subdivision of existing industrial floorspace will be supported where it supports appropriate diversification and meets the needs of a specific end user, and does not compromise the existing operators.
  - d. Any net loss of industrial floorspace and premises within a SIL will not be supported, and
  - e. Proposals that fall within use classes E(g) (ii) & (iii) will be resisted from being located within SIL, and will only be supported where demonstrated to support an existing Use Class B2 or B8 type use.
- A.1 Co-location of residential within a SIL will not be supported.

#### **B. Locally Significant Industrial Sites (LSIS)**

- a. Proposals to intensify, increase or modernise floorspace and premises within LSIS will be supported where the uses fall within the industrial-type activities below;
  - 1) General Industry (B2) and similar Sui Generis uses
  - 2) Storage and logistics/distribution (Use Class B8)
  - 3) Secondary materials, waste management and aggregates
  - 4) Utilities infrastructure (such as energy and water)

- 5) Land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure
  - 6) Wholesale markets
  - 7) Emerging industrial-related sectors
  - 8) Flexible (B2/B8) hybrid space to accommodate services
  - 9) Low-cost industrial and related space for micro, small and medium-sized enterprises
- b. New & emerging industrial uses must demonstrate operational compatibility with the LSIS.
  - c. Subdivision of existing industrial floorspace will be supported where it supports appropriate diversification and meets the needs of a specific end user, and does not compromise the existing operators.
  - d. Any net loss of industrial floorspace and premises within a LSIS will not be supported;
  - e. Proposals that fall within use classes E(g) (ii) & (iii) will be resisted from being located within LSIS, and will only be supported where demonstrated to support an existing Use Class B2 or B8 type use.
- B.1 Co-location of residential within a LSIS will not be supported.

### **C. Non-designated Industrial Land**

- a. Proposals to intensify, increase or modernise floorspace or premises within non-designated industrial sites will be supported where the uses fall within the industrial-type activities specified within Policy A.a above, and subject to compliance with other relevant policies within the development plan;
- b. Mixed use schemes will be supported where they comply with the criteria set out within Policy E7C of the London Plan 2021.

### **D. Non-industrial uses on industrial land.**

- a. Proposals that seek to introduce non-industrial uses within an industrial site must demonstrate the ancillary nature of the non-industrial use, or satisfactorily demonstrate it is unable to be located elsewhere within the borough with respect to the principle of development.
- b. Non-industrial uses that are not satisfactorily demonstrated as being ancillary to an industrial use or not demonstrated as being able to be located elsewhere within the Borough will not be supported.

## **Supporting Text**

Over recent years the Borough has experienced a trend of continual floorspace losses for industrial land. Numerous small, incremental losses have been supplemented by the loss of some larger sites to residential use including the Kodak Site which was previously designated as Strategic Industrial Land in its entirety but allocated for a comprehensive mixed-use development in the current Local Plan and the Strategic Industrial Land designation consolidated in the process. Such an approach of managed release of industrial land was consistent with the London Plan at the time.

The London Plan (2021) brought forward a step change in how industrial land should be considered across all of London, seeking to ensure there would be a sufficient



supply of land and premises to meet the current and future demand for industrial and related functions. To determine this, up-to-date evidence to determine what would constitute a sufficient provision at a borough level is required.

The London Industrial Land Supply Study (March 2023) sets out a comprehensive review and update of the London industrial land supply. For Harrow, it sets out the following supply of industrial land across the different typologies. The amount of industrial land within Harrow makes up 1% of the industrial land and premises of all of London.

Land Designation	Industrial Land Premise (ha)	Non-industrial land within designated sites (ha)	Total (ha)
Strategic Industrial Land	13.1	1.3	14.4
Locally Significant Industrial Sites	18.1	4.6	22.7
Non-Designated Industrial Land	16.7	N/A	16.7
<b>Total</b>	<b>48.4</b>	<b>5.9</b>	<b>54.3</b>

[figures directly from Table 2.7: London Industrial Land Supply Study (March 2023)]

The West London Employment Land Review (2021/22 Update) sets out that the floorspace requirements across the plan period equal 0.6 hectares. This policy seek to ensure that existing industrial floorspace and premises would be retained, and to seek renewal and provision of new quality premises where possible. Given the modest amount of floorspace that is required to be delivered, the Council will seek to deliver this within the existing industrial sites located across the borough. As at November 2021 the vacancy rate was 1.7% and this is below the Mayor of London's Land for Industry and Transportation Supplementary Planning Guidance (SPG) (2012), which sets out a reasonable average rate of frictional vacancy of 5%. By reason of this, there is limited justification for the release of industrial land in the borough.

Strategic Industrial Lands are a London Plan designation and are the main reservoir of land for industrial, logistics and related uses across London, and are given strategic protection because they are critical to the effective functioning of London's economy. There are two Strategic Industrial Locations in the Borough: the Wealdstone preferred industrial location and the Honeypot Lane industrial business park; the extent of these designations is shown on the Proposals Map. Harrow's SIL land forms part of the Park Royal / Heathrow sub-regional industrial property market area.

SIL estates are able to accommodate activities which - by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements - can raise tensions with other land uses, particularly residential development. It is for this reason that the Council will only support uses that require such space to operate successfully, and encouraging uses that are able to co-locate more easily in areas of the borough without harming the amenity of neighbouring occupiers.

The industrial floorspace requirements across the local plan period to 2041 is relatively minimal, being 0.6ha of floorspace and premises or just over 1% of current provision. Policy LE 03 (Industrial Land) seeks to actively promote the intensification and

modernisation of floorspace within SIL locations, and will direct industry that by reason of its very nature, would not be appropriate in more sensitive locations. Whilst Policy E4 (Land for industry, logistics and services to support London's economic function) of the London Plan (2021) set out conforming uses for industrial land, proposals for new development will only be supported where they are within use class B2 or B8, or where a Sui Generis use can be satisfactorily demonstrated as being of similar impacts to B2 or B8. Use Class E(g)(ii) and (iii) (Formerly B1 b/c) are listed as being appropriate within industrial land as set out in Policy E4 (Land for industry, logistics and services to support London's economic function).

However, by reason of the limited stock of industrial land within Harrow, this policy prioritises uses that are less likely to be able to be provided elsewhere within the borough (outside of designated industrial estates). Industrial uses that would fall within a B2, B8 or a similar scale and intensity Sui Generis use are often unneighbourly through their impacts, and coupled often with long opening hours, require space to be able to operate in such a manner without uncertainty of being restricted by sensitive receiving environments. Use Class E(g)(ii) and (iii) can be carried out in any residential area or town centre (as set out in the Use Class Order 2020) without causing detriment to the amenity of the area, and as such these uses are directed outside of designated industrial estates.

Residential use within SIL or LSIS is not appropriate as it leads to a reduction in the provision of industrial floorspace and premises for industrial activities and cannot be justified given the low vacancy rates in Harrow and the modest need for additional floorspace and premises.

The current evidence base for industrial land across Harrow sets out that the Borough is not in a position to release any further floorspace and premises from the borough stocks. Furthermore, it is forecast that across the Local Plan period (2041), the Council will deliver the required number of homes as set out in its housing target. By reason of this, the policy does not support the co-location of housing within designated industrial estates. By reason of this, in conjunction with the limited industrial floorspace and premises, there is not an evidenced need to provide housing in such locations, whereby potentially further eroding the brought industrial land supply.

In order for London to meet its industrial floorspace and premises requirements, protection must also be afforded to industrial sites that are not designated either as SIL or LSIS. During the London Plan (2021) Examination in Public amendments were made in relation to non-designated industrial land and premises, as it was considered for London to have the sufficient provision of industrial floorspace and premises, non-designated industrial and would need to play a stronger role. Accordingly, further protection was provided for its provision. Specifically for Harrow where there is a limited industrial stock, any opportunity to increase industrial floorspace on such sites will be encouraged and supported. Uses must conform with the appropriate uses set out in Policy E4 (Land for industry, logistics and services to support London's economic function) of the London Plan (2021). Thirty percent of Harrow's industrial stock is comprised of non-designated industrial land, and therefore protection of this is critical to ensuring sufficient floorspace is provided.

Co-location of non-designated industrial land may be an acceptable form of development, where it maintains industrial floorspace and delivers housing to assist in meeting wider development plan objectives. Such proposals will be on a case-by-case basis with great weight given to what any loss of industrial use and floorspace would be as part of a development. Proposals that would result in the loss of a use from a site that is unable to be demonstrated to be re-provided within the borough, will not be supported. Developments that are unable to re-provide successful industrial or appropriate employment floorspace, that cannot be re-provided elsewhere result in further loss of industrial floorspace and premises that evidentially cannot be released. Applications that seek to replace one industrial use for another, where the existing use is not easily capable of being relocated, and replaced with a use that could be located in more sensitive areas, will be resisted.

### **Appropriate Uses**

The Council will support non-conforming uses within industrial premises where they are ancillary to the main industrial use on the site or premises, and that the non-conforming use is clearly connected to the successful operation of an established industrial use. Considerations around the fact and degree of the primary industrial use of site or premises and the non-conforming ancillary element will need to be clearly set out and satisfied.

Non-conforming uses within an established industrial site prevent the optimal use of the site, which is to maximise the industrial capacity with uses that are unlikely to be acceptable in other locations. Non-conforming uses will result in less floorspace and premises within such sites, and by their nature are likely to be acceptable in sustainable locations outside of such established industrial sites, such as town centres. Policy E4 (Land for industry, logistics and services to support London's economic function) of the London Plan (2021) sets out a list of conforming uses for such sites, with Policy (this one) providing more specifics in relation to appropriate uses. The Council recognise that there are and will be emerging industries that will come forward over the life of the plan which are not listed within the policy. Proposals for emerging industrial uses may be appropriate, and will need to clearly set out how they would be generally consistent with uses within an industrial estate and why such a use would not be appropriate elsewhere.

### **Reasonable Alternatives:**

Option 1 – allow for the full range of appropriate industrial uses: An alternative policy could be to allow for all of the appropriate industrial uses set out under Policy E4A of the London Plan (2021) to occur within Strategic Industrial Land and Local Strategic Industrial Sites. By reason of the limited industrial floorspace within LB Harrow, such an approach is not the preferred option as this would mean uses that could occur elsewhere in the borough without adverse impacts would instead occur on the borough's limited amount of industrial land, at the opportunity cost of industrial uses that are more appropriately located on designated industrial land.

Option 2 – allow for co-location: An alternative policy approach may be to allow for the co-location of housing on Local Strategic Industrial Sites, which is set out as appropriate (subject to process) within the London Plan (2021). By reason of the

limited industrial floorspace within LB Harrow, which evidence suggests stock should be maintained to ensure a sufficient amount, and the forecasted ability to meet housing targets without requiring such an option, this is not the preferred option.

## Policy LE4 Culture and Creative Industries

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter XX:*

### Policy LE4 Culture and Creative Industries

- A. The Council will support proposals for cultural and creative industries where they:
  - a. Are in a location that is appropriate for their use;
  - b. Are of a size, layout and form that is suitable for the intended use;
  - c. Do not harm residential amenity or the free flow and safety of the public highway;
  - d. Take the opportunity to utilise vacant premises in appropriate locations for pop ups or meanwhile uses; and
  - e. Address the agent of change principle (Policy D12 of the London Plan (2021)).
- B. The Council will support the modernisation and / or the expansion and enhancement of floorspace that serves existing cultural facilities or creative industries where;
  - a. There is a demonstrable need for the extended floorspace; and
  - b. Relevant policies within the wider development plan are taken into consideration.
- C. The loss of existing cultural facilities or creative industry floorspace will be resisted. Proposals that seek to release floorspace or premises will only be supported where;
  - a. It can be robustly demonstrated that there is no longer any need for the existing use; or
  - b. The use is able to be provided elsewhere within the borough where:
    - i. The floorspace is of equal or greater quantum / quality; and
    - ii. The alternative location is within an equally or more accessible location.
  - c. Alternative cultural or creative industry uses have been considered

### Supporting Text

Cultural facilities are essential infrastructure that make up an important element of any place. Harrow has a wide range of assets that are of cultural importance, many of which are associated with the built environment and natural landscapes. Many of the heritage listed buildings in Harrow, such as St Mary's Church atop Harrow on the Hill are very prominent with views to it from many parts of the Borough. Many others have a more local connection. To the north-east of the Borough, Harrow Weald provides a vantage point across the Borough. These locations are designated as Areas of Special

Character, and provide culturally important assets for the Borough. Proposals that may impact on Area of Special Character must consider Policy HE3 of the Local Plan.

The Harrow Economic Needs Study (2023) suggests there is no clear qualitative or quantitative need for additional theatre, music/nightclub or cultural provision. However, there may be potential to increase LB Harrow's low market share and attract more demand from tourist visitors if provision is improved. The Inclusive Economy, Leisure and Culture division will continue to look for opportunities and work with stakeholders to increase the market share through improved provision.

The Westminster University Film School is located on the Borough boundary (within London Borough of Brent) and among other end users, in conjunction with the relatively affordable workspace, there is an opportunity to support this industry. Storage for set paraphernalia and props for filming are an essential requirement of the industry, and the small to medium sized storage style warehouses across the borough can provide affordable floorspace and premises. Furthermore, short term events such as art gallery or performance events are capable of taking up vacant premises or space within major developments.

The Council recognises the importance of the assets that it has within the borough, both natural and built, which contribute to the attractiveness of the place to live and / or work in or just to visit. For these reasons, the Council will seek to ensure that existing assets are retained and their continued operation and appreciation protected, and any opportunity to improve them is realised, including improving public access.

The Council will support new cultural floorspace where it is located in appropriate sites across the borough, and will encourage such space into town centres. Recognising that such floorspace can't always be located in highly sustainable locations by virtue of availability and affordability of premises and locational and design requirements. Where new floorspace is proposed, applicants will be required to demonstrate how the facility is able to address sustainability matters, and where applicable, set out mitigation measures for facilities not located in sustainable locations.

Creative Industries may be considered acceptable within industrial estates where they can be demonstrated that they are an emerging industry and would not compromise successful operation of the wider estate. Any application must demonstrate the appropriateness of its use in any location.

Where existing facilities are proposed to be modernised or extended, this will be supported where the extra floorspace is required to enable the ongoing success and function of the use that exists on the site. Where the modernisation or expansion of floorspace results in either a larger footprint or a more intensive use of the site, proposal must demonstrate that there would be no harm to the local area, either through residential amenity or impacts on parking and highway matters. The Harrow Arts Centre is the main centre of culture within the borough, and new development that helps to maintain or enhance this provision, whilst preserving its heritage contribution, will be supported.

Across the borough, vacant premises can provide the opportunity for pop-up or meanwhile uses for a range of uses, including cultural or creative industries. This could include premises that have been vacant for some time, or floorspace within major developments. Whilst premises or floorspace may not be intended to remain vacant across the long term, some pop-up events only seek short term space for an event.

Vacant premises or floorspace do not contribute positively to an area, and can also lead to anti-social behaviour issues arising by reason of such spaces being unoccupied and not providing natural surveillance. Where a meanwhile or pop-up use can utilise such space, it enlivens the area whilst providing an opportunity for space to contribute more positively to an area. In particular to creative industries, space can be difficult to obtain and can be expensive for start-up users for arts or creative space. Major developments which provide for non-residential floorspace will be expected to submit (for approval by the Council) a vacancy strategy. This strategy should set out how the non-residential floorspace is able to be let at an affordable cost to temporary users, specifically considering the cultural and creative industries.

**Reasonable Alternative:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy LE5 Tourism and Visitor Accommodation

*Linkages:*

*NPPF Chapter XX:*

*London Plan Chapter XX:*

### **Policy LE5 Tourism and Visitor Accommodation**

- A. Proposals for new hotel development and serviced apartments will be directed towards Harrow Town Centre and the wider Harrow & Wealdstone Opportunity Area. Proposals for new hotel development and serviced apartments outside of the Harrow & Wealdstone Opportunity Area will be directed to sites in accordance with the following sequential order of preference:
- a. town centres;
  - b. edge of centre;
  - c. highly sustainable locations
- B. Subject to compliance with A above, new tourism infrastructure will be supported where;
- a. the size and character of the site or building are suitable for the proposed use;
  - b. the development will be compatible with the character and appearance of the area;
  - c. the residential amenities of local residents will not be harmed by way of noise, disturbance, loss of light or privacy;
  - d. it provides a choice of accessible accommodation in accordance with Policy E10H (Visitor Infrastructure) of the London Plan (2021);
  - e. it would not result in an over-concentration of the type of accommodation within the locality;
  - f. there will be good access and links or opportunities for good access and links to modes of transport other than the private vehicle; and
  - g. vehicle access to and from the highway will be safe.
  - h. Ensure adequate access, drop-off/pick-up and servicing arrangements;
- C. The Council will resist the loss of tourist infrastructure. Any loss of tourism infrastructure will only be supported where;
- a. there is no longer a need for that facility; or
  - b. The redevelopment of the site would result in an over-riding public benefit; and
  - c. Any change in use or redevelopment complies with other policy requirements of the development plan.
- D. The use of a residential property for temporary sleeping accommodation (short term let or holiday let) must not exceed 90 nights within a calendar year. Proposals seeking to exceed this will require planning permission and must consider;
- a. The loss of a single-family home
  - b. Car parking
  - c. Residential amenity



- E. To assist with the circular economy, proposals for tourism accommodation should provide a statement to demonstrate how in the future the design of the proposal could allow its conversion into other uses appropriate for its location.

### Supporting Text

In addition to the 11th Century St Mary's Church, Harrow boasts tourist attractions that include Bentley Priory Museum, Headquarters to Fighter Command during the Battle of Britain, Harrow-on-the-Hill, West House, and Headstone Manor and Museum celebrating 1200 years of local history and including The Great Barn once owned by Henry VIII.

As an outer London borough, Harrow's tourism economy is still an integral part of the local and wider economy. A strong tourism economy provides opportunities for local residents through jobs and supports local businesses across the borough. The London Plan (2021) estimates that an additional 58,000 bedrooms of serviced accommodation will be needed in London by 2041, where Harrow is set to provide 347 serviced apartments over this same period.

The Borough has excellent links into central London, and enables convenient public transport for visits to central London, Wembley Stadium and Wembley Arena and accommodation is often competitively priced. Covid19 has had a significant impact on the tourism infrastructure globally, with London being no exception. There was a sharp fall across the hospitality sectors within West London and Harrow, and most notably in accommodation and food services. [footnote <https://wla.london/wp-content/uploads/2021/04/2021-April-Oxford-Economics-Report-Refresh-how-has-Coronavirus-impacted-the-West-London-economy.pdf>]. However, following the easing of restrictions imposed in relation to Covid19, saw some of the fastest (temporary) recoveries. Notwithstanding any recovery, it is anticipated that the sector will progress with a lower work force than pre-pandemic.

Notwithstanding the convenient links into central London, tourism accommodation also provides opportunities to visit local attractions. Specifically, Harrow boasts attractions such as Harrow School, and a number of museums including Heath Robinson, Headstone Manor, and Bentley Priory. The Council has invested in a number of attractions within the borough, with the aim to make these more accessible for the visiting public and viable as an attraction.

New hotel and leisure development is directed into the Harrow town centre, reflecting its Metropolitan centre status and in support of the Harrow & Wealdstone Opportunity Area objectives. Throughout the rest of the Borough, the Council will expect proposals for hotel development and other forms of tourism accommodation to locate in town centres to avoid impacts on residential amenity and to benefit from good public transport links and local services.

Given the London-wide demand for tourism infrastructure, specifically in relation to a range of tourism accommodation, any loss of such a use would not contribute to meeting the requirements across the plan period. Proposals that seek to reduce tourism infrastructure within the borough will be resisted, unless supported by robust justification. A marketing exercise covering a minimum continuous period of 24 months, including details of commercial agents, advertisements and lease terms

offered must support any such application. Submitted evidence will be reviewed by a suitably qualified professional to ensure appropriateness of the marketing. Alternatively, proposals that result in a loss of such a use that would form part of a comprehensive development, and which is demonstrated to result in an over-riding public benefit, will be supported.

Where the loss of tourism infrastructure is accepted, proposals should first seek to provide employment or community use floorspace where appropriate. Provision of employment space will assist in continuing or increasing the level of footfall, and sustaining the vitality and vibrancy of an area, which in most cases will be a town centre or a highly sustainable location.

Any change in use or redevelopment must comply with other policy requirements of the development plan.

Guest houses and bed & breakfast accommodation help to provide a choice of visitor accommodation. Such uses also provide business opportunities for residents that contribute to local economic activity. However care is needed, particularly in residential areas, to balance the impacts of guest house and bed & breakfast uses with the amenity of neighbouring occupiers and the character of the area. Over-intensive use of a property is likely to give rise to disturbance to neighbouring occupiers and could generate an excessive level of external activity by visitors' arrival and departure. Even where individual proposals are acceptable, an over concentration of guest houses and bed & breakfast accommodation in a road or locality can lead to unacceptable cumulative effects.

Guest houses and bed & breakfast (short term let or holiday let) must not exceed more than 90 days, this is to ensure the borough's housing stock is maintained. The government is seeking to introduce a new use class, Use Class C5, which will address short term let or holiday let accommodation. Whilst it is noted that such infrastructure can provide an alternative and often cost-effective option, it can be at the detriment of housing stock for Harrow residents.

The Council wishes to encourage tourism that does not harm the environment or residential amenity. New tourist development can widen the cultural and recreational opportunities available to local people for use and employment, making the best use of resources. To support the circular economy, purpose-built tourism infrastructure proposals should be supported by a statement setting how they can be repurposed to change use to other uses that would be appropriate to their locations. Given the sustainable locations of tourism infrastructure, often located in town centres, new builds should be flexible to be capable of multiple end users with minimal intervention. In the event that tourism infrastructure is no longer required (having been demonstrated through compliance with part C of the Policy), retrofitting the shell and core to another use is a much more sustainable option than demolition and rebuild. Furthermore, the flexibility of buildings, especially in town centre locations, assist in such locations being more able to adapt to changing market conditions.

#### **Reasonable Alternative:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

# **Chapter 06: Community Infrastructure**

## Strategic Policy 06: Social and Community Infrastructure

### Linkages:

*NPPF Chapter 8: Promoting Healthy and Safe Communities*

*London Plan Chapter 5: Social Infrastructure*

*London Plan Chapter 8: Green Infrastructure and the Natural Environment*

*London Plan Chapter 9: Sustainable Infrastructure*

### Strategic Policy 06: Social and Community Infrastructure

- A. Development must contribute to the protection, enhancement and additional provision of; community services and facilities; physical, social, green and blue infrastructure, to adequately address the Borough's existing and future needs. This will be achieved through:
- a. Ensuring new development and growth is co-ordinated and phased in tandem with the provision of appropriate physical and social infrastructure;
  - b. Requiring proposals for new development to demonstrate adequate infrastructure capacity exists or will be provided on and off site to serve the development;
  - c. The development or expansion of physical or social infrastructure, where it is needed to serve existing or proposed development, or required to meet projected future requirements;
  - d. Resisting the loss of community facilities unless adequate arrangements are in place for their replacement or the enhancement of other existing facilities;
  - e. Requiring all development to contribute to the delivery of strategic infrastructure identified in the Infrastructure Delivery Plan; and
  - f. Utilising the Community Infrastructure Levy (CIL) or any subsequent mechanisms to fund the maintenance and provision of infrastructure through legal agreements.

### Supporting Text:

The infrastructure policies in this chapter, have been developed in line with the Infrastructure Delivery Plan (IDP 2024). The IDP assesses the current state of infrastructure in Harrow and identifies where additional provision may be required in line with development and population growth. While development is required to create more capacity in our local infrastructure, strategic work must also be undertaken in line with the IDP to use our infrastructure resources more efficiently.

The Council will work with stakeholders to identify and infrastructure capacity issues and deliver required infrastructure. Applicants will be required to assess the impact of their proposals on infrastructure and include measures to facilitate the delivery of

new or enhanced infrastructure. Development contributions to infrastructure should be considered in the viability assessment of any proposal.

**Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy CI1: Safeguarding and Securing Social Infrastructure

*Linkages:*

*NPPF Chapter 8: Promoting Healthy and Safe Communities*

*London Plan Chapter 5: Social Infrastructure*

### **Policy CI1: Safeguarding and Securing Social Infrastructure**

#### **New Social Infrastructure**

A. Proposals will be required to make contributions towards the provision of enhanced or new social infrastructure, in locations where there are existing capacity issues or a need is identified, to support new development

B. Proposals relating to new or enhanced social and community infrastructure facilities, including the consolidation of existing facilities, will be supported where they respond to a demonstrable need and:

- a. Are located in areas easily accessible by public transport, walking and cycling, preferably in town centres or the Harrow and Wealdstone Opportunity Area;
- b. Are located within the community they are intended to serve;
- c. Do not adversely impact residential amenity or highway safety;
- d. Are provided in flexible, adaptable and all abilities accessible buildings, preferably co-located with other social infrastructure uses; and
- e. Must maximise wider community benefit through utilisation of community use agreements.

#### **Existing Social Infrastructure**

C. The Council seeks to retain and protect existing social infrastructure and community facilities from loss to alternative uses. Any proposals that result in loss of these uses will be resisted, unless proposals can adequately demonstrate that:

- a. There is no longer a need for the current use (as evidenced by 24 months of effective marketing), and there is no projected future need, or the site is unsuitable for the current use and there is no need for any other suitable community use on the site; and
- b. The loss of social infrastructure would not result in a shortfall in provision of that use; or
- c. A replacement facility is provided that would better meet the specific needs of existing and future users in regard to quantity, quality and location; or
- d. Redevelopment would secure enhanced social infrastructure re-provision (on or off-site) ensuring continued delivery of social infrastructure and related services.

D. Any proposal to redevelop an existing social infrastructure site should prioritise the use of the site for an alternative social infrastructure use.

**Explanatory text:**

Social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. It includes health provision, education, community, play, youth, early years, recreation, sports, faith, criminal justice and emergency facilities, as outlined in the London Plan.

Social infrastructure plays an important role in developing strong and inclusive communities. It can provide opportunities to bring different groups of people together, contributing to social integration and the desirability of a place.

The council will work closely with the community and stakeholders to identify infrastructure needs across the borough, and work to secure timely delivery of high-quality infrastructure and services. The Infrastructure Delivery Plan (IDP) will be used in conjunction with relevant corporate plans and strategies to plan the roll out of new and improved social infrastructure.

Development must be supported by new or enhanced social infrastructure to ensure that quality of life in the borough is improved. Opportunities for the delivery of enhanced or new infrastructure are scarce due to constrained nature of the built-up area and other development pressures. Therefore, existing social and community infrastructure sites will be protected for ongoing community use where possible. The policy seeks to enable the development of new social infrastructure and the protection of existing facilities from redevelopment pressure to competing land uses.

The loss of social infrastructure can have a detrimental effect on communities, therefore it will be avoided unless justified having regard to the overall need for infrastructure in the borough and any site-specific considerations.

Any proposals involving the loss of a community use should be evidenced by 24 months of continuous effective marketing, at a reasonable market rate. Evidence should include various examples of online and local marketing through reputable agents.

The Council is continuing to seek to identify and understand community need relating to burial space within the borough. As different religious groups have differing requirements for burial space this will be examined in detail to ensure there is adequate space going forward. The Council will continue to engage through Duty to Cooperate meetings with other boroughs, highlighting West London burial space needs as a consideration.

**Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy CI2: Play and Informal Leisure

*Linkages:*

*NPPF Chapter*

*London Plan Chapter*

### **Policy CI2: Play and Informal Leisure**

Development proposals that are likely to be occupied or used by children and young people must increase opportunities for play and informal recreation.

- A. Development proposals for new housing must incorporate well-designed and high-quality formal play provision of at least 10 square metres per child.
- B. Play space provision should be delivered on-site and made accessible to all children in the development. Where development is to be phased, there should be early implementation of play space. All play space must be designed to:
  - a. Ensure public access is not unreasonably restricted in major developments,
  - b. Provide a safe and stimulating environment for all age groups and abilities represented in the development,
  - c. Provide rest and amenities areas for children and parents (i.e benches, shade, access to water, etc), and
  - d. Incorporate landscaping and permeable surfaces.
- C. Off-site provision of play and recreation space will only be acceptable in exceptional circumstances, where it is demonstrated that:
  - a. On-site provision is not feasible and there is existing play space, or
  - b. New provision will be delivered within proximity to the development and can be accessed safely and easily by residents.
- D. Development proposals resulting in the loss of play space will be refused unless replacement provision of at least an equivalent amount and improved quality will be provided.

### **Explanatory Text:**

Development should provide opportunities for high-quality, accessible children's play space to support and encourage active living. Safe and stimulating play spaces have a positive impact on physical and mental wellbeing of both children and parents. Play facilities are an important tool in the fight against childhood obesity and also provide opportunities for social interaction and development in young people.

In line with the London Plan, new residential developments must provide formal play space of at least 10 square metres per child in order to address child occupancy requirements. Provision should be proportionally based on the number of children expected to occupy the development and an assessment of future needs. The GLA's play space calculator can be used to find and evidence the level of play space required.



Play space should be delivered on-site. Off-site provision will only be considered in exceptional circumstances where it is demonstrated; on-site provision is not feasible and there is existing play space, or new provision will be delivered within proximity to the development and can be accessed safely, easily by residents. Applicants will be required to provide evidence to demonstrate that delivery on-site is not feasible, including a design options appraisal, and assurance that the need generated by the development will be adequately met.

All new play space should be delivered through a carefully considered design-led approach with the end user in mind. Play space and other outdoor communal amenity space should be integrated at the street or ground floor level. The siting of provision on rooftops should be avoided where possible as this may impede safe access. Developments should maximise opportunities to integrate nature and 'green' features into play space, including tree planting and landscaping. This provides a pleasant environment that contributes to informal play, climate change mitigation and biodiversity uplift.

Play space should be designed in a way that is accessible to all children and parents regardless of ability. Play England's 'design for play' guide should be used to guide the design of play spaces, particularly with regard to all abilities access.

**Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy CI3: Sport and Recreation

*Linkages:*

*NPPF Chapter*

*London Plan Policy*

### Policy CI3: Sport and Recreation

- A. Proposals that would increase the capacity and quality of outdoor sport and recreation facilities, and those that would secure community access to private facilities, will be supported provided that:
  - a. There would be no conflict with Green Belt, Metropolitan Open Land or open space policies;
  - b. The proposal would not have a detrimental impact on any heritage or biodiversity assets within or surrounding the site; and
  - c. There would be no adverse impact on residential amenity or highway safety.
- B. Proposals for uses that would support existing or proposed outdoor sport and recreational facilities will be supported where they are:
  - a. Ancillary in terms of size, frequency, use and capacity; and
  - b. Do not displace or prejudice facilities needed for the proper functioning of the principal outdoor sport and recreational uses.
- C. Proposals for floodlighting will be supported where they would:
  - a. Enhance outdoor sport and recreation facilities; and
  - b. Not detrimentally impact the character of open land, the amenity of neighbouring occupiers or biodiversity.
- D. All proposals should facilitate community access to sport and recreation facilities through a community use agreement, unless it can be demonstrated that it is not feasible.
- E. Proposals which would lead to the loss of, or would prejudice the use of a sports or recreation facility will be resisted unless:
  - a. Any loss of facilities would be replaced by equivalent or better provision in terms of quantity and quality, in a suitable location in accordance with Policy CI1 (Safeguarding and securing new Social Infrastructure); or
  - b. The development is for alternative sports and recreational provision for which the identified need clearly outweighs the loss of the existing facility.

### Supporting text:

The provision of formal and informal sport and recreation facilities encourages physical activity and delivers a range of social, health and wellbeing benefits to communities.

The Harrow Indoor and Outdoor Sports Facilities Strategy (2023 – 2037) assesses existing and future needs for sporting infrastructure provision across the borough. The aim of the document is to ensure the on-going provision of high-quality, accessible playing pitches and built sport facilities to meet the needs and demands of the borough's current and future populations.

The Strategy identifies key objectives and local needs (current and projected to 2037), including:

- The need to replace or improve existing Leisure and recreation facilities;
- Additional pressures arising from a growing, ageing and changing population;
- The need to protect future usage and extend access to facilities where possible;
- The important role the Council plays as an enabler in developing better quality facilities in partnership with Sport England and National Governing Bodies of Sport;
- The role of sport and physical activity to support residents and visitors through recovery from the pandemic and the cost-of-living crisis.

The document provides evidence that Harrow's sporting infrastructure needs to be protected and enhanced in line with population growth, and existing deficits addressed where possible. Sport and recreation facilities are detailed in the Infrastructure Delivery Plan as essential infrastructure. Any development should consider projects identified in the IDP for infrastructure contributions. Any loss of sporting infrastructure resulting from development must be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.

New and upgraded sport and leisure facilities should ensure that sustainable transport options are prioritised for users to minimise reliance on cars for access.

Sport and leisure facilities should ensure that all abilities access and amenity is provided on site.

Community use agreements will be secured by the planning authority in the form of a legal agreement with the landowner.

Harrow will continue to work with strategic partners such as Sport England to assess and respond to demand for sporting infrastructure, and seek arrangements to ensure community access to facilities within the borough.

### **Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy CI4: Digital and Communications Infrastructure

*Linkages:*

*NPPF Chapter*

*London Plan Policy*

### **Policy CI4: Digital and Communications Infrastructure**

- A. Proposals for the installation of telecommunications equipment will be supported where:
  - a. The installation would be on an existing mast or building or, if a new mast is proposed, it has not been possible to find a suitable existing mast or building to meet operational requirements;
  - b. The siting and design of the installation would minimise its impact upon the amenity of neighbouring occupiers, the host building (where relevant), and the appearance and character of the area;
  - c. There would be no unacceptable impact upon areas of designated open space, heritage, landscape and biodiversity value;
- B. Where installation of telecommunications infrastructure is required to support the effective functioning of the emergency services, compliance with A. above may not be feasible. These applications will be determined on a case by case basis, based on evidence submitted by the applicants.
- C. Existing communications infrastructure (i.e masts, cabinets, aerials, etc) and sites must be utilised where possible to minimise over proliferation of equipment. Any grounds for rejecting co-location of infrastructure or sites must be clearly justified.

### **Supporting Text:**

High-speed, reliable digital connectivity is a necessity for businesses, students and individuals, playing an important role in maintaining a competitive local economy, attracting new investment and creating jobs in the Borough. Infrastructure that supports the operation of digital connectivity should be planned for and facilitated by infrastructure providers and the Council.

The pandemic created new cultural shifts for businesses and residents with increased rates of people working from home and utilising video calls. This has created a significant demand and reliance on digital technology and broadband connections.

To meet these needs, the Council will continue to work with private sector providers to roll out required infrastructure. This will ensure Harrow has a high-quality broadband fibre network and mobile phone services for its residents and businesses. Providers and planning agents are encouraged to engage with the council through digital infrastructure pre-application services to establish plans and address any issues early in the planning process.

Rates of full-fibre broadband connectivity are lower in Harrow than the London average. Several key projects have been identified in the Harrow Infrastructure Delivery Plan (IDP) to increase connectivity rates.

Development proposals must demonstrate how they will improve digital connectivity on sites located in areas where full-fibre broadband, or equivalent infrastructure, is not currently available or on sites that are otherwise poorly served by broadband coverage, including in designated employment areas and town centres. Proposals must address the findings of Harrow's Infrastructure Delivery Plan.

Digital and communications infrastructure should utilise existing sites or equipment where possible to minimise on-street and visual clutter. Evidence that providers have assessed opportunities for sharing of infrastructure needs to be provided as part of any application for new infrastructure. The proliferation of new telecommunications structures should be kept to a minimum, ensuring visual impacts are appropriately mitigated. All digital and communications infrastructure should be neatly and discretely screened to minimise visual clutter.

Advertisements associated with wi-fi or telecommunications infrastructure must be proportionate to the overall structure, and must not lead to an over proliferation within a locality, in line with Policy GR12 (Advertisements, digital displays and hoardings).

Opportunities for the rationalisation or screening of equipment already installed on existing masts, buildings and street cabinets should be explored.

Where new telecommunications provision is crucial to the operations of the emergency services, such provision should be enabled without undue impediment in the interests of the safety of Harrow residents.

### **Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

# **Chapter 07: Green Infrastructure**

## Strategic Policy 07: Green Infrastructure

*Linkages:*

*NPPF Chapter*

*London Plan Chapter*

### **Strategic Policy 07: Green Infrastructure**

- A. Green infrastructure should be identified, protected, restored, enhanced, and extended. The planning, design, and management of green infrastructure should be integrated, and the context carefully considered to ensure the most appropriate benefits are targeted, maximised and maintained.
- B. Access to green infrastructure will be enhanced where possible.
- C. Green Belt and Metropolitan Open Land (MOL) will be protected from inappropriate development in line with Policy GI1 (Green Belt and MOL).
- D. Development will not be permitted on designated open space, other than for small-scale, ancillary facilities needed to support or enhance the proper functioning of the open space in line with Policy GI2 (Open Space).
- E. There should be no net loss of green space in the borough. Additional green space provision will be supported.
- F. The quality and functionality of green infrastructure will be enhanced.
- G. Biodiversity should be enhanced both retrospectively and in new development, particularly where this will strengthen local ecological networks or address deficits in line with policy GI3 (Biodiversity);
- H. Drainage is considered, and flood risk reduced giving priority to natural SuDS provision in line with Policy CN4 (Sustainable Drainage);
- I. Green spaces should be multifunctional providing a range of ecosystem services and benefits, targeting local need;
- J. Local food growing measures (allotments, urban gardens, stop and grow) will be supported in line with Policy GI5 (Food Growing);
- K. Opportunities for cross-borough collaboration and the consideration of green infrastructure in an integrated way as part of a network will be pursued.

### **Supporting Text:**

The term 'Green Infrastructure' refers to the network of blue and green spaces, parks and gardens, nature reserves, sports pitches and playing fields, allotments, cemeteries, trees and woodlands, green roofs and drainage systems. The type, condition and degree of connectivity of the natural capital features that form part of the borough's green infrastructure assets determines the extent and nature of the ecosystem services they provide in supporting human wellbeing and quality of life. Maximising the value and benefits derived from these assets, requires planning, design, and management.

Metropolitan Open Land and Green Belt spaces provide some of Harrow's largest green infrastructure assets. These are protected from inappropriate development through the London Plan and NPPF. Private gardens, green spaces, green corridors,

and landscaped areas are also green infrastructure assets requiring protection, enhancement and reconnection, particularly in areas deficient in natural capital.

Green infrastructure and the natural capital it supports will play an increasingly pivotal role in keeping the borough liveable and providing equitable public goods from which everyone should benefit. Green infrastructure plays several important roles, including:

- Cooling our cities and combatting the urban heat island effect,
- Minimising flooding by providing enabling natural drainage,
- Removing pollution from the air and creating oxygen,
- Supporting and providing access to bring about higher levels of biodiversity.

Improvements in green infrastructure provision can facilitate mental and physical health and wellbeing, climate change mitigation and adaptation, water and air quality improvements, active travel (walking and cycling), ecological connectivity and resilience, wildlife conservation and habitat condition and local food growing, as well as traditional aspects such as play, sport and recreation.

While this policy aims to protect and enhance Harrow's environment, there are ongoing examples of front and rear gardens being hard surfaced, and vegetation removal contributing to biodiversity loss and climate risks in the borough. The council will resist proposals that do not contribute to a clean and green borough or impact on ecosystem services.

### **Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.



## Policy GI1: Green Belt and Metropolitan Open Land

*Linkages:*

*NPPF Chapter*

*London Plan Policy: G2 London's Green Belt*

*London Plan Policy: G3 Metropolitan Open Land*

### **Policy GI1: Green Belt and Metropolitan Open Land**

- A. Green Belt Land:
  - a. Any proposals for development in the Green Belt will be considered in accordance with the NPPF.
  - b. Development adjacent to Green Belt should not have a significant detrimental effect on the openness of the Green Belt, and must respect the character of its surroundings.
- B. Metropolitan Open Land (MOL):
  - a. In accordance with the London Plan, Metropolitan Open Land is to be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt.
- C. Proposals for the beneficial use of land in the Green Belt and MOL will be supported where the use would not have an inappropriate impact on the openness and permanence of the Green Belt and MOL, having regard to:
  - a. Visual amenity and character;
  - b. Potential to enhance public access as part of the Green Grid;
  - c. Use of land for food growing or community gardening;
  - d. The protection and enhancement of heritage assets;
  - e. Biodiversity improvements;
  - f. Natural capital improvements.

#### Redevelopment or Infilling of Sites

- D. Proposals for the redevelopment, infilling or partial infilling of previously developed sites in the Green Belt and MOL will only be supported where the proposal would not have a greater impact on the openness and permanence of the Green Belt and MOL, and the purposes of including land within it, than the existing development, having regard to:
  - a. The height of existing buildings on the site;
  - b. Visual amenity and character of the site and surrounds;
  - c. The proportion of the site that is already developed;
  - d. The footprint, distribution and character of existing buildings on the site; and
  - e. The relationship of the proposal to any retained development on the site.
- E. All proposals on Green Belt or MOL land should be put forward in the context of a comprehensive, long term plan(s) for the site as a whole.

#### Inappropriate and Harmful Development in the Green Belt and Metropolitan Open Land

F. Proposals for inappropriate development, or redevelopment which would harm the essential characteristics or purpose of the Green Belt or Metropolitan Open Land will be refused in the absence of clearly demonstrated very special circumstances.

### Supporting Text

Harrow's Green Belt accounts for 21.6% of Harrow's land area, and benefits from a variety of uses that help to maintain its openness and character. As well as a number of farmland and woodland areas, uses of the Borough's Green Belt include sports grounds, public open space, nature reserves and burial space. The Green Belt's purpose is to provide a break between urban areas and rural areas.

Metropolitan Open Land is strategic open land located in the urban area and is specific to London. MOL uses in the Borough include parks, outdoor sports pitches, golf courses and allotments.

Beneficial uses of Green Belt and Metropolitan Open Land help to sustain their openness and usefulness for the current and future generations.

The NPPF and London Plan strongly advocate for the protection of Green Belt and MOL land. The primary aim of the Green Belt is to prevent urban sprawl by keeping land permanently open.

Inappropriate development is, by definition, harmful to the Green Belt and will not be approved except in very special circumstances. Very special circumstances arise when harm resulting from a proposal is clearly outweighed by other considerations.

Harrow's MOL should be protected from inappropriate development in accordance with the same national planning policy tests that apply to the Green Belt. Proposals that enhance community access to MOL or provide additional appropriate benefits for the community will be encouraged. Examples include improved public access, inclusive design, sport and recreation facilities, habitat creation, landscaping improvement and flood mitigation.

A significant strategic redevelopment opportunity exists at the Royal National Orthopaedic Hospital in the Green Belt (Site Allocation XX). The Hospital is a nationally and internationally recognised facility located in the Green Belt at Brockley Hill, Stanmore. The hospital complex is spread over a substantial site area and occupies many outdated, substandard buildings. Redevelopment of the site offers the potential to provide a modern, fit for purpose accommodation that befits the hospital's status, and improves the openness of the site by rationalising the footprint of the buildings. The desirability of providing new accommodation for the hospital is a significant consideration and may constitute very special circumstances for enabling development that would otherwise be inappropriate development in the Green Belt.

Another strategic Green Belt redevelopment opportunity exists at Harrow College (Site Allocation XX). The College is currently spread over two sites, with the principal campus located in Lowlands Road, Harrow Town Centre. Parts of the site are substantially open in character and should remain so; redevelopment will be confined within the boundary shown in the Policies Map. The original college building on the site is of some local architectural and historic merit and every effort should be

made to retain it. However, the wider complex contains many later additions, the potential redevelopment of which could secure rationalisation of built form and enhance the site's contribution to Green Belt openness. Open land to the north of the existing complex of buildings could form an extension to Harrow Weald cemetery.

Biodiversity improvements on MOL of Green Belt land will be encouraged in line with Policy GI4 (Biodiversity) and must be a consideration for all forms of development. Harrow's two Sites of Special Scientific Interest and the majority of the Borough's Sites of Importance for Nature Conservation (SINC) are located in the Green Belt, contributing to the character, openness and biodiversity value of the area. Food growing (allotments) and community gardens will be encouraged on MOL and Green Belt land.

**Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy GI2: Open Space

*Linkages:*

*NPPF Chapter*

*London Plan Policy: G4 Open space*

### Policy GI2: Open Space

- A. Development proposals must:
  - a. Contribute to the provision, protection and enhancement of high quality, multi-functional, publicly accessible open space, particularly in areas of deficiency;
  - b. Not result in the net-loss of publicly accessible open space;
  - c. Improve access to green space where possible, particularly in areas where deficiencies in access have been identified; and
  - d. Enhance biodiversity and improve access to biodiversity and natural capital.
  
- B. Major development proposals must incorporate new publicly accessible open space unless it can be clearly demonstrated that this is not feasible, in which case off-site contributions will be required.
  
- C. Existing open space, sports pitches, recreational buildings, and playing fields should not be built on unless:
  - a. An assessment has been undertaken that clearly demonstrates the open space, buildings or land are surplus to requirements; or
  - b. The loss resulting from the proposed development would be replaced by equivalent or better provision, in terms of quantity and quality in a suitable location; or
  - c. The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
  - d. The development is required for critical social infrastructure, the positive benefits of which clearly outweigh the loss of the current or former use.

### Supporting text:

Open Space is a vital component of London's open space network and, more locally, the West London Green Grid, which contributes significantly to the environmental quality and natural capital of the borough and surrounds. Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.

Much of Harrow is relatively well served by parks and open spaces. However, since the pandemic there has been increased usage and damage to Harrow's open spaces. This is evidenced by Harrow's performance in the Good Parks London

rankings, falling from 11<sup>th</sup> out of 32 London Boroughs in 2018, to 26<sup>th</sup> out of 29 London Boroughs in 2022<sup>25</sup>.

Several areas within the borough have a deficiency in access to green space. The south and central areas of the borough have a deficiency in the quantity of open space provision, while deficiencies in accessibility exist in the south-eastern and south-western areas of the borough, as shown by the map below. Work must be undertaken to improve the number and quality of open spaces in these areas in line with the Harrow Open Space PPG17 Study (2011), and the Harrow Sports Facilities Strategy (2023).

Open space should be taken into account in planning for new development and considering proposals that may affect existing open space in the borough. Upgrades have been made to several key sites in recent years, although more work is required to secure a greater number of green spaces, adding to the Harrow Green Grid and improving the quality of the existing spaces in the borough.

Opportunities exist to improve the quality of open spaces including nature sites and the connections between them; protecting and adding to residents' opportunities for access to nature and the benefits this provides. Open spaces that are well-designed and well-managed for people and nature can provide a range of other ecosystem benefits. To realise these, development must support the provision, protection and enhancement of open spaces. Development must maintain and wherever possible enhance access to, and connections between the network of open spaces within and outside the Borough, prioritising measures that encourage walking and cycling.

Development proposals located adjacent to open space must respond positively to the character of the open space as well as protect, and wherever possible enhance, the biodiversity value and visual amenity provided by the space.

**Table X.X: Harrow Open Spaces Hierarchy**

Type	Number	Land area
District Parks	9	TBC
Local Parks and Open Spaces	11	TBC
Small Open Spaces	5 +1	TBC
Pocket Parks	2*	TBC
Linear Open Spaces	1	TBC

\*Pocket Parks – The Weald Village Tenants' and Residents' Association made a successful application for a grant for a pocket park in 2013 but there's no information available about it at present.

## INSERT MAP OF OPEN SPACE DEFICIENCY

<sup>25</sup> <https://parksforlondon.org.uk/wp-content/uploads/2022/12/Good-Parks-for-London-2018.pdf>

**Reasonable Alternatives:**

One reasonable alternative to this policy is proposed. This policy specifies that Open Space could be used for the development of community infrastructure in exceptional circumstances. A reasonable alternative would be to make this policy more restrictive, removing this specification and not allowing development of community infrastructure on Open Space land. This alternative would however potentially impact upon the provision of community infrastructure required to support development and the ability for the LPA to consider the overall planning balance for individual community infrastructure proposals impacting upon open space.

## Policy GI3: Biodiversity

Linkages:

NPPF Chapter

London Plan Policy: G6 Biodiversity and access to nature

### Policy GI3: Biodiversity

#### Protection of Biodiversity & Natural Capital

- A. Biodiversity and natural capital must be protected and enhanced. Development proposals must be adequately evidenced and follow the Ecological Mitigation Hierarchy.
- B. Development proposals must not result in loss of, or pose direct or indirect negative impacts to:
  - a. Irreplaceable habitats (e.g. ancient woodland) or features (e.g. ancient/veteran trees)
  - b. Sites nationally or internationally designated for nature conservation or geodiversity
  - c. Core areas identified within the Local Nature Recovery Strategies (LNRSs) for London or Hertfordshire
  - d. Other important sites, features or functions where losses or impacts could not be adequately mitigated or compensated for with regard to:
    - i) LNRS areas;
    - ii) Sites of Importance for Nature Conservation/ Regionally Important Geological Sites;
    - iii) Areas of priority habitat;
    - iv) Populations of protected, priority or locally notable species;
    - v) Important features (e.g. historic hedgerows);
    - vi) Green or blue corridors or other functional linkages within the local ecological network; and
    - vii) Ecosystem function or resilience.
- C. Development proposals that would increase deficiencies in access to nature will be resisted.

#### Biodiversity and nature recovery

- D. Development proposals should:
  - a. Conserve and enhance Harrow's biodiversity;
  - b. Utilise nature-based solutions to manage environmental pressures;
  - c. Strengthen the Borough's natural capital;
  - d. Improve access to nature where practicable; (link to deficiency in access)
- E. All major and minor development proposals must be supported by a proportionate Biodiversity Net-Gain Plan (BGP) which clearly identifies how the development will minimise harm and maximise biodiversity gain. Proposals will be required to demonstrate compliance with the criteria below and provide:
  - a. A minimum of 2 biodiversity units per hectare;

- b. A minimum net uplift in biodiversity unit value of 20%;
- c. A minimum of one wildlife shelter (i.e swift box/bee brick etc.) per residential unit; and
- d. Details surrounding the delivery, monitoring and maintenance of BNG units, whether wholly on-site, or utilising locally strategic off-setting location(s).

**Explanatory text:**

Nationally, the UK has experienced extreme losses of biodiversity over the last 50 years, and is now one of the most nature-depleted countries on earth<sup>26</sup>. Recently, there has been greater recognition of the value of nature and its role in mitigating climate change. It is now considered imperative that greater efforts are made to better manage land and restore ecosystems.

The Environment Act 2021 sets out the framework for a national Nature Recovery Network which local authorities will support through the preparation of Local Nature Recovery Strategies (LNRS).

Harrow has a wide variety of flora and fauna habitats as identified in the Harrow Biodiversity Action Plan. Threats to Harrow's local biodiversity include increased recreational pressure, air pollution, climate change, development, fragmentation, water use and vandalism. The Local Plan aims to combat or mitigate each of these pressures.

To ensure that biodiversity degradation in Harrow is reversed, the council has set a biodiversity net gain target of a minimum 20% increase in habitat value for wildlife compared with the pre-development baseline. This will be calculated using an appropriate Biodiversity Metric. Biodiversity net gain should be fully integrated into a design-led approach with consideration given to the site context and wider landscape setting.

Development proposals must submit an ecological assessment which identifies biodiversity interests within and surrounding the development site and assess any potential impacts. Proposals should demonstrate how the development will respond positively to identified biodiversity interests. The scale of development will determine the level of detail required in the assessment. The NPPF sets out principles for determining planning applications where there is potential harm to biodiversity, as does the London Plan.

Biodiversity net gain should be secured and maintained for as long as the development exists. Maintenance payments for off-site biodiversity units should cover a minimum of 30 years. Planning conditions and/or legal agreements may be used to secure Management Plans where they are considered necessary to support nature conservation. Where a development is unable to achieve the appropriate level of net gain, an offsite contribution equivalent to the percentage of deficit will be agreed with the Council.

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<sup>26</sup> State of Nature Report 2023 [https://stateofnature.org.uk/wp-content/uploads/2023/09/TP25999-State-of-Nature-main-report\\_2023\\_FULL-DOC-v12.pdf](https://stateofnature.org.uk/wp-content/uploads/2023/09/TP25999-State-of-Nature-main-report_2023_FULL-DOC-v12.pdf)



Where adverse impacts to biodiversity cannot be avoided, mitigation measures must be in place to offset the impacts. The hierarchy of mitigation measures is as follows:

1. Avoid damaging the significant ecological features of the site;
2. Minimise the overall spatial impact and mitigate it by substantially improving the quality or management of the rest of the site; and
3. Deliver off-site compensation of higher biodiversity value.

All types of development should aim to incorporate some form of wildlife shelter i.e a swift brick, bee brick or similar. Utilisation of native species and plants of high biodiversity value should be major components of formal landscaping or garden planting.

All proposals should make provision for the eradication of Invasive Non-native Plant species listed on Schedule 9 of the Wildlife and Countryside Act and/or by London Invasive Species Initiative where these occur on site.

### **Reasonable Alternatives:**

One reasonable alternative to this policy is proposed. This policy requires a Biodiversity Net Gain of 20%. A reasonable alternative would be to align with the Environment Act and stipulate that a Biodiversity Net Gain of only 10% is required, this is the status quo for all local authorities. The Biodiversity evidence base shows that a Biodiversity Net Gain of 20% would be achievable for most developments without being too onerous or disproportionately impacting viability.

## Policy GI4: Urban Greening, Landscaping and Trees

*Linkages:*

*NPPF Chapter: xx*

*London Plan Chapter: xx*

### Policy GI4: Urban Greening, Landscaping and Trees

- A. Development proposals must demonstrate that a design-led approach has been used to maximise opportunities for local greening. Proposals should include the integration of high quality and species diverse landscaping, trees, wildlife habitat, green roofs, green walls and Sustainable Drainage Systems, giving preference to native species where possible.
- B. Major development proposals must increase the overall value of green cover on site to achieve the London Plan recommended Urban Greening Factor (UGF), unless it can be adequately demonstrated that this is not feasible. Predominantly residential development should achieve a UGF score of 0.4. Predominantly commercial development should achieve a score of 0.3. Existing green cover retained on-site will count towards the UGF score. Planning contributions will be sought where the required level is not achieved on-site in order to secure offsite provision.
- C. All new development should retain and integrate existing trees of value into the site layout. Opportunities for additional tree planting and habitat creation should be maximised. There is a presumption in favour of retaining and integrating existing trees, woodlands and hedgerows within development sites.
- G.
- D. Trees identified for retention must be protected during the construction phase of development, and replaced where necessary upon completion of the development.
- E. Planning permission will be refused where proposals would result in the loss of or harm to:
  - a. Trees subject to a TPO
  - b. Ancient or Veteran trees, ancient woodlands or hedgerows
  - c. Trees categorised as suitable quality and value (as categorised within BS5837 survey)
- F. Where there is an unavoidable loss of trees onsite, replacement trees will be required to be planted on site where appropriate at a rate of at least two new trees for each tree lost. Where this requirement cannot be met on site, financial contributions will be sought for offsite provision of any shortfall.
- G. Proposals for works to trees in conservation areas and those the subject of tree preservation orders will be permitted where the works are for sound arboricultural reasons and do not risk compromising the long-term health

and appearance of the tree. Proposals for work which are not in accordance with best practice (BS3998:2010) will be refused.

- H. Proposals which would result in the loss of ancient or veteran trees, woodland or hedgerows, will not be permitted under any circumstances.
  
- I. Development proposals that fail to make appropriate provision for hard and soft landscaping, or fail to contribute to streetside greenery where appropriate, will be refused. Appropriate provision of hard and soft landscaping must:
  - a. Be appropriate to the character of the area;
  - b. Be well laid out in terms of access, car parking and the living conditions of future occupiers and neighbours;
  - c. Achieve a suitable visual setting for the building(s);
  - d. Provide sufficient space for new or existing trees and planting to grow and does not result in post-development pressure, and;
  - e. Support biodiversity.
  
- J. The Council will undertake and encourage new planting of street trees and shrubs, secured by legal agreement if necessary, and provide, restore and/or maintain grass verges on public and private streets. Where new streets are proposed these should be tree-lined, and provisions for long term maintenance will be required.
  
- K. Proposals for the provision of hard surfacing of forecourts and front gardens will be resisted. If allowed, in part permeable materials and soft landscaping should be utilised in development proposals.

### **Supporting Text:**

Harrow is largely characterised by extensive tree and shrub cover, with woodland, streetside vegetation and forecourt greenery an essential aspect of its character. The Council will seek to protect, enhance and add to these important features, increasing the borough's natural capital. The Council will seek to protect and enhance these important features.

### Urban Greening

The London Plan sets an Urban Greening Factor (UGF) requirement for major developments. The UGF provides a target for the value of green cover that development is expected to provide. The Council will adhere to the recommended UGF factors for major residential and commercial development as set by the London Plan. Existing green cover retained on site as part of a development proposal will count towards the target UGF score.

Major development proposals should meet and seek to exceed the target UGF score. Consideration will be given to proposals that suitably demonstrate that the target cannot be achieved due to technical feasibility or financial viability, in which

case proposals should show that they have been designed to achieve the highest score possible. Guidance in the Urban Greening Factor SPG should be followed.

Development proposals should utilise green roofs and walls, where appropriate, ensuring that they are appropriately designed, installed and maintained. Major development proposals will be expected to demonstrate integration of green walls and roofs has been fully investigated. If the incorporation of green walls and roofs has not been pursued an explanation for this decision must be provided. Minor development proposals are strongly encouraged to incorporate green walls and roofs. All green roof and wall proposals must maximise benefits for biodiversity, sustainable drainage and cooling, complying with the latest industry standards. Design led solutions should be used to ensure that green roofs and walls do not detract from the character of the dwelling or surrounds.

### Trees and Landscaping

Landscape design is integral to the design and functioning of the whole site and surrounds. The landscape and buildings need to be considered together from the start of the design process.

Design and Access statements must be supported by a robust, illustrated masterplan and a landscape strategy including management and maintenance proposals to ensure that the development is established and maintained in accordance with the design objectives, and is required for outline planning applications. A combination of hard and soft landscaped spaces should provide attractive and usable amenity areas, avoiding awkward spaces.

The level of detail provided in the landscape plan should be commensurate with the detail provided about the building in a planning application. Planning applications are required to demonstrate that proposed landscaping and other urban greening measures will be appropriate, can be implemented effectively and will be suitably managed over the lifetime of the development. Appropriate management and maintenance programmes will be required to be implemented to protect newly planted trees.

Development proposals must ensure adequate replacement tree planting and maintenance where the retention of trees is not reasonably practical. The Council will require trees identified for retention to be protected during construction, and to be retained or replaced where necessary following the completion of the development. In some instances, it may be more appropriate to include replacement or new tree planting as part of a development's landscaping scheme.

In wholly exceptional circumstances, where protected trees are proposed to be removed, suitable re-provision will require replacement and/or additional planting to re-provide at least equal canopy cover and/or equal environmental amenity and visual value. Where on-site re-provision cannot be provided, a financial contribution of the full cost of appropriate re-provision will be required.

Developer contributions towards trees within the public realm may be required and will be secured by a legal agreement or other relevant mechanism.

When a financial obligation is required for replacement trees the value should be calculated using the Capital Asset Value for Amenity Trees (CAVAT) or a similar suitable methodology. Financial contributions will be expected to include on-going

maintenance costs for a minimum of 30 years where trees are planted in the public realm.

Financial contributions may also be sought to enhance the Harrow Green Grid and connections.

#### Impermeable Landscaping

Substantial areas of hard surfacing are considered to be any more than 5 square metres, as allowed for in the Town and Country Planning (General Permitted Development Order) 2015 (GPDO) (as amended) or any smaller threshold set out in subsequent GPDO.

Hard landscape surfacing should be minimised in any development or planning application to maximise the efficacy of sustainable drainage systems, mitigate flooding, enhance biodiversity and urban greening. Permeable paving and surfacing options should be utilised in development, and their permeability maintained.

## Policy GI5: Food Growing

*Linkages:*

*NPPF Chapter*

*London Plan Policy: G8 Food growing*

### **Policy GI5: Food Growing**

- A. The Council will resist proposals that result in the loss of allotments, city farms and community gardens in order to support sustainable food growing locally, and to enhance opportunities for biodiversity, leisure, social interaction and education.
- B. The Council will support proposals to enhance, and increase provision of allotments, city farms and community gardens including necessary ancillary facilities in suitable areas, having regard to flood risk, soil quality, access to sunlight and land contamination.
- C. Major development proposals for housing and/or community facilities will be required to demonstrate they have explored options to include the provision of space and/or infrastructure for community gardening and food growing.
- D. Redevelopment proposals on sites with existing food growing assets should retain or re-provided any land and infrastructure, resulting in no net loss of provision.

### **Supporting Text:**

Allotments and community gardens form part of Harrow's green infrastructure network. They are an important local resource for many reasons, including:

- Local food production and minimisation of food miles;
- Increased biodiversity and green space;
- Fostering community through social interaction and reducing loneliness;
- Educational resources for adults and children;
- Leisure and recreation;
- Health and wellbeing.

There are currently 34 statutory allotment sites in the borough which will be protected and enhanced as valuable green infrastructure assets. The provision of additional allotment and community garden sites will be encouraged on a permanent or temporary basis on vacant or under-utilised land, or as a meanwhile use.

Allotments are particularly invaluable to those who do not have access to a private garden, helping to promote inclusivity in the community. For this reason, the inclusion of allotments and community gardens is heavily encouraged in new developments to provide residents with a meeting place to interact.

New residential and community development proposals should incorporate provision for food growing as a design-led consideration early on in the planning process. Provision should be of a high quality that meets the needs of all age groups and abilities. Ancillary facilities should also be provided in the form of water taps, storage facilities and composting bins. Additional guidance for the planning of allotments can be found in the Harrow Allotment Strategy, and the National Allotment Society's guidance for planners and developers<sup>27</sup>.

**Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

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<sup>27</sup> <https://www.nsalg.org.uk/wp-content/uploads/2023/08/NAS-Development-Brochure-2023-LR.pdf>

# **Chapter 08: Responding to the Climate and Nature Emergency**



## Strategic Policy 08: Responding to the Climate and Nature Emergency

Linkages:

NPPF Chapter

London Plan Chapter 9: Sustainable Infrastructure

London Plan Policies: SI 2 Minimising greenhouse gas emissions, SI 3 Energy infrastructure

### Strategic Policy 08: Responding to the Climate and Nature Emergency

A. In compliance with the Council's Climate and Nature Strategy (2023-30), all development in Harrow must be undertaken in accordance with sustainable development practices, and positively manage natural capital for the benefit of current and future generations. Development must contribute to achieving the following objectives:

#### Clean Energy Used Efficiently

- a. Make the fullest possible contribution to reducing greenhouse gas emissions in both the construction and operational phases of development by maximising energy efficiency and conservation measures, whilst prioritising the use of low carbon heating, renewable energy solutions and local renewable energy generation in line with Policy CN2 (Energy Infrastructure).
- b. Ensuring that all new housing is net zero carbon in line with Policy CN1 (Sustainable Design and Retrofitting).

#### Green Mobility

- c. Prioritise active and low carbon transport options to include walking, cycling and public transport.
- d. Reduce fossil fuel vehicle journeys, supporting necessary ongoing private vehicular travel needs by facilitating and encouraging car-sharing and electric vehicle usage.

#### Waste-Free Economy

- e. Minimise the embodied carbon and ecological footprint of new development by ensuring that materials are sustainably sourced, sustainable construction techniques are utilised, and waste is re-used and recycled as part of the circular economy.
- f. Through careful material selection and design, ensure developments are capable of being easily altered and adapted for future needs to ensure the fullest possible utilisation during their lifetime, and are otherwise capable of disassembly and full re-use or recycling of materials at end of life.
- g. Design developments to enable occupiers to apply the waste hierarchy during day-to-day use, and to support the growth of the circular economy by increasing re-use and recycling of materials whilst minimising residual waste.

**Healthy Places for us and Nature**

- h. Contribute to building a healthier, more resilient and thriving local natural environment that is valued by the people of Harrow. This will include:
1. Making space for Nature and increasing levels of biodiversity, the integrity of ecosystems and the borough's stock of natural capital;
  2. Where possible avoiding or otherwise minimising light and noise pollution, and improving air, water and soil quality;
  3. Protecting people and places from climate impacts and risks through locally distinctive, high quality and sustainable design and multi-functional green infrastructure that increases local resilience, including to drought, overheating, storm and flooding events;
  4. Improving residents' health and wellbeing by affording greater opportunities for direct connection with the natural world locally; and
  5. Protecting and enhancing carbon storage in the local natural environment.

**Explanatory Text:**

The London Borough of Harrow has declared a climate and nature emergency. This acknowledges the far-reaching ecological impacts of human-induced climate change. This declaration recognises that a changing climate will have severe and enduring social, economic, and environmental implications.

In response to the above, the Council has produced a Climate and Nature Strategy 2023-30. This establishes a framework of key actions which the Council, local communities and other stakeholders can prioritise to significantly reduce greenhouse gas emissions in the period to 2030, support the recovery of the natural world and increase local resilience to the impacts of climate change. These measures are reflected in the policies contained within this Local Plan.

In accordance with the NPPF (Paragraph 152) (2021), 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.'

The London Plan sets a strategic objective and framework for London to become a net zero-carbon city by 2050. The plan provides an overarching set of aims for mitigation and adaptation to climate change across London.

The Harrow Climate and Nature Strategy 2023-2030 highlights four action areas illustrated in the policy above, and identifies climate change as 'The destabilisation of

our climate by the burning of fossil fuels, and the associated weakening and depletion of ecosystems on our planet caused by human activity’.

Locally significant changes will need to be made to the way the borough grows as we attempt to limit global warming and adapt to a changing environment. The Local Plan and the Climate and Nature Strategy will be the foundation of the Borough’s response to the climate and nature emergency.

**Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy CN1: Sustainable Design and Retrofitting

Linkages:

NPPF Chapter

London Plan Policy

### Policy CN1: Sustainable Design and Retrofitting

#### New Buildings

- A. All new buildings should be designed and built to be Net Zero Carbon in operation. They should be ultra-low energy buildings, utilise low carbon heat with no fossil fuels burnt on-site, contribute to the generation of renewable energy on-site, and be constructed with low levels of embodied carbon.
- B. All new buildings should meet the following standards:

#### Space Heating Demand

- a. All dwellings should achieve a space heating demand of less than 15 kWh/m<sup>2</sup> GIA/yr; and
- b. All non-domestic buildings should achieve a space heating demand of less than 15 kWh/m<sup>2</sup> GIA/yr;

#### Energy Use Intensity (EUI)

- c. Domestic buildings - All dwellings should achieve an Energy Use Intensity (EUI) of no more than 35 kWh/m<sup>2</sup>GIA/yr;
- d. Non-domestic buildings - Non-domestic buildings should achieve an Energy Use Intensity (EUI) of no more than the following (where technically feasible) by building type or nearest equivalent:

Building Typology	EUI Standard
Student or keyworker accommodation, care homes, extra care homes	35 kWh/m <sup>2</sup> GIA/yr
Warehouses and light industrial units	35 kWh/m <sup>2</sup> GIA/yr
Schools	65 kWh/m <sup>2</sup> GIA/yr
Offices, Retail, HE Teaching facilities, GP surgeries	70 kWh/m <sup>2</sup> GIA/yr
Hotels	160 kWh/m <sup>2</sup> GIA/yr

#### Offsetting (as last resort)

- e. Offsetting will only be accepted as a means to achieving planning policy compliance as a last resort if the building is compliant with all other Net Zero Carbon building aspects. In these circumstances, the applicant should establish the shortfall in renewable energy generation to enable the annual renewable energy generation to match the Energy Use

Intensity in kWh. The applicant should pay into the Council's offset fund a sum of money equivalent to the shortfall; this contribution will be secured by way of a planning obligation.

### **Retrofit of Existing Buildings**

- C. The use of sustainable conversion and retrofitting measures will be encouraged and supported to improve the energy efficiency of buildings, as well as the quality of living for their occupants. Retrofitting measures should consider how the building has been constructed, its context, and energy use.
- D. Development proposals for major residential domestic refurbishment must achieve a certified 'Excellent' rating under the BREEAM Domestic Refurbishment 2014 scheme<sup>28</sup>. or future equivalent, unless it can be demonstrated that it is not feasible.
- E. Development proposals for major non-residential refurbishment, including mixed-use development, will be required to achieve a certified 'Excellent' rating under the BREEAM Non-Domestic Refurbishment scheme, or future equivalent, unless it can be demonstrated that it is not feasible.
- F. Proposals for retrofit of existing buildings must consider impacts on the historic environment, heritage assets, and amenity of the building's users and neighbours.

### **Supporting Text:**

In accordance with the NPPF, 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures'. The Central government, Greater London Assembly (GLA) and the London Borough of Harrow have each declared a climate emergency and committed to minimising greenhouse gas emissions.

In 2022, the residential sector emitted approximately 17% of all carbon emissions in the UK<sup>29</sup>. The age of a property is the single biggest factor in the energy efficiency of homes, according to the ONS<sup>30</sup>. This highlights that new homes, and other buildings, are significantly more energy efficient than older building stock, which requires retrofitting to bring them up to appropriate Energy Performance Certificate (EPC) ratings of 'C'. EPCs are required for all buildings when constructed, sold, or rented.

To achieve the Council's carbon reduction aspirations by 2030 all new buildings in Harrow are required to be Net Zero Carbon. Exceptions to this rule exist for

<sup>28</sup> ([https://tools.breeam.com/filelibrary/BREEAM%20Refurb/KN4613\\_-\\_BREEAM\\_Domestic\\_Refurbishment.pdf](https://tools.breeam.com/filelibrary/BREEAM%20Refurb/KN4613_-_BREEAM_Domestic_Refurbishment.pdf)),

<sup>29</sup>

([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/114737/2/2022\\_Provisional\\_emissions\\_statistics\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/114737/2/2022_Provisional_emissions_statistics_report.pdf)).

<sup>30</sup> (<https://www.ons.gov.uk/economy/environmentalaccounts/articles/climatechangeinsightsuk/august2022>)

residential annexes and extensions, outbuildings, storage buildings, structures that are not buildings (i.e pylons, plant machinery etc.). Minor developments can simplify the process through the use of pro-forma reports to reduce the pre-planning costs associated with predictive energy modelling.

Net Zero Carbon is defined by the London Energy Transformation Initiative (LETI) as 'A building which operates at net-zero carbon does not burn fossil fuels, has ultra-high energy efficiency and is 100% powered by renewable energy<sup>31</sup>'. Extensive retrofitting of existing building stock will be required to achieve this efficiency, and future proofing of buildings will be required to ensure future works are easily facilitated. Constructing new buildings to be low-carbon from the outset is significantly cheaper than retrofitting and typically delivers more effective outcomes.

High standards of sustainable design are expected of all developments, including new development, retrofit, conversion and refurbishments. All development should aim to make effective use of resources and materials, future proofing for increased efficiency and reuse of materials where possible. Sustainability, including embodied carbon in buildings, should be considered early in the design process in order to maximise energy and carbon savings, and minimise construction and operational costs.

All buildings in England must comply with Part L 2021 of the Building Regulations. They set a minimum level of performance. However, there is currently a significant gap between these buildings standards and the standards required to genuinely become net zero. The average Energy Use Intensity (EUI) required to achieve a net zero carbon balance across UK housing stock is 35 kWh/m<sup>2</sup>/yr, which is significantly lower than the average that current building standards deliver.

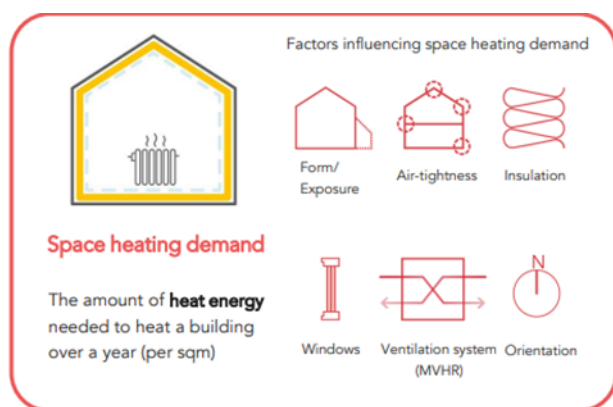
The London Plan imposes higher standards for net zero development; however, it does not fully deliver net zero according to the LETI definition. The London Plan policy does not take unregulated emissions into account, allows for up to 65% of regulated emissions to be offset, and only applies to major development schemes.

To fully achieve net zero development and ensure climate change resilience, Harrow has set the standards in the policy above considering regulated and unregulated energy use. These are measured through Space Heating Demand and Energy Use Intensity (EUI). The evidence base for this work (Delivering Net Zero 2023) was undertaken in collaboration with 18 London boroughs, all of whom are seeking to achieve net zero development.

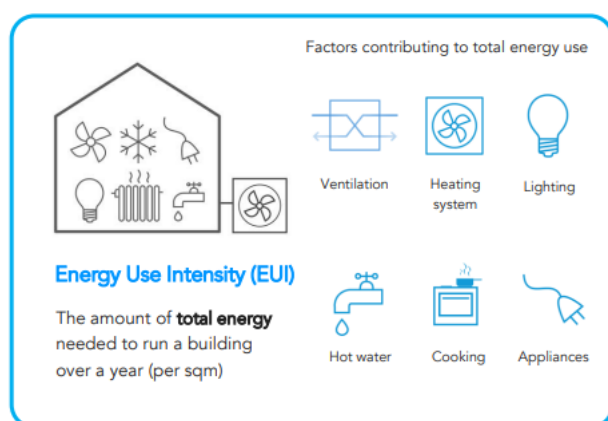
Space Heating Demand refers to the amount of heat energy needed to heat a building over the course of a year per square metre. Various design and specification decisions affect space heating demand including building form and orientation, insulation, airtightness, windows and doors and the type of ventilation system.

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<sup>31</sup> <https://www.levittbernstein.co.uk/site/assets/files/3494/leti-climate-emergency-design-guide.pdf>



Energy Use Intensity (EUI) represents the total amount of energy used by a building divided by its floor area (GIA) and is reported in kWh/m<sup>2</sup> year. The EUI is a good indicator of the energy efficiency of a home/building and can be calculated at both the design stage and post completion. For buildings heated by an individual heating system, performance monitoring will be simple as it will be the annual 'energy at the meter' divided by the floor area.



Developments should be connected to a low or zero carbon district heating network where possible, in accordance with Policy CN2 (Energy Infrastructure).

On-site renewable energy generation will be required in most instances for buildings to be net-zero. There is a preference for low lying roof mounted solar PV, although other forms of generation may be appropriate. Where the use of on-site renewable energy generation to match total energy consumption is not technically feasible or economically viable, renewable energy generation should be maximised as much as possible. Where this is not possible, a contribution to the Harrow carbon offset fund will be required.

Developments should be designed to reduce the extent of heat loss by reducing the number of junctions and optimising elevation design to create passive energy efficiency, as well as optimising orientation and utilising dual aspects. Passivhaus principles should be followed in the design stages of a development, and where possible in retrofitting existing buildings.

Buildings must also comply with the additional requirements of the Building Regulations Part L 2021, including Fabric Energy Efficiency criterion for domestic

buildings and Primary Energy criterion for all buildings and demonstrate compliance at planning stage.

### Offsetting

Offsetting will only be allowed where the following conditions are met:

- The proposed building must not use fossil fuels on-site.
- It must have a level of space heating demand and energy use intensity (EUI) compliant with levels set in the Local Plan.
- On-site renewable energy generation (e.g. through PVs) has been maximised and achieves at least 80 kWh/m<sup>2</sup> building footprint for all building types (and 120 kWh/m<sup>2</sup> building footprint for industrial buildings).

Development should seek to minimise predicted energy and maximise PV (or other acceptable renewable energy) generation on site. Once officers are satisfied that the building complies with the policy requirements above, energy offsetting may be used to deal with the shortfall between EUI and on-site renewable energy generation. Applicants must work out the difference between the development's EUI and how much renewable energy it will generate. Any shortfall of renewable energy generation will lead to an energy offset payment to the council, this cost is based on the basis of the cost of solar PVs. The evidence base has set the energy offset price at **£1.32/kWh/yr**, this price will be reviewed as necessary.

### **Reasonable Alternatives:**

Two reasonable alternatives have been identified for this policy.

#### *Alternative 1: Development size threshold (not the preferred option)*

The policy outlined above applies to all new buildings, with reasonable exclusions for outbuildings. An alternative policy would have an option that just focusses on major applications / development proposals, (i.e 10+ units) or the small site threshold (sites less than 0.25 ha in size). This option has not been pursued as it would likely undermine the strategic intent of the policy for all buildings to meet net zero standards, particularly for smaller housing developments of 9 units or less. If this option were pursued, smaller developments would need to demonstrate that they have aimed to make buildings as close to net zero as possible, within the limits of viability. As Harrow is likely to experience significant incremental development outside of the opportunity area (reflected by the indicative small sites target in the London Plan being a significant proportion of the overarching housing target for Harrow), many buildings in the suburban areas would not be required to be net zero, which would be a missed opportunity to minimise carbon emissions and future proof the borough's buildings.

#### *Alternative 2: Approach to measuring zero carbon – Part L, Building Regulations*



Outlined below is an alternative option (referred to as Policy Option 1, with Policy Option 2 being the preferred option set out in the above draft policy CN1) for the Sustainable Design Policy, based on a continuation of the approach of using Part L of the Building Regulations to define and measure carbon / net zero.

### **Part L, Building Regulations (not the preferred option):**

All developments must achieve Net Zero Carbon according to the Building Regulations framework, i.e. a 100% improvement over Part L 2021 and offset their residual emissions.

#### **On-site carbon reduction**

All developments must reduce carbon emissions on-site as much as possible. In terms of regulated emissions, the minimum level of on-site performance required is:

- Domestic buildings: 65% better than Part L 2021
- Office buildings: 25% better than Part L 2021
- School buildings: 35% better than Part L 2021
- Industrial buildings: 45% better than Part L 2021
- Hotel: 10% better than Part L 2021
- Other non-domestic buildings: 35% better than Part L 2021 (tbc)

Buildings must also comply with the other requirements of the Building Regulations Part L 2021, e.g. Fabric Energy Efficiency criterion for domestic buildings and Primary Energy criterion for all buildings and demonstrate compliance at planning stage.

Applicants must undertake Part L 2021 modelling to demonstrate compliance.

Unregulated emissions must also be reduced as much as possible.

#### **Carbon offsetting**

On-site carbon reductions should be maximised as far as possible before any remaining emissions are offset. If the Council is satisfied that the development has maximised on-site reductions, but the development is still short of achieving Net Zero Carbon, the developer is expected to make a cash-in-lieu contribution to the Council's carbon offsetting fund at a price of **£880/tCO<sub>2</sub>** per year over a period of 30 years in order to offset any remaining carbon emissions and achieve net zero carbon.

#### *Rationale for not being the preferred option*

Option 1 reflects the 'standard' energy policy as contained in the London Plan 2021. It focuses on a single metric, the % reduction in regulated carbon emissions using Building Regulations Part L 2021 compliance modelling tools.

Utilising Building Regulations Part L results in a narrow definition of zero carbon, as it only considers 'regulated' carbon emissions (e.g. it does not include equipment and appliances). Option 2 (the preferred option which is set out in the above draft policy CN1) considers all energy uses in the building and seeks to achieve a balance between energy use and on-site renewable energy generation (i.e., zero carbon), only allowing offsetting to address a potential imbalance.

Option 2 is also considered more robust, as it sets absolute targets (namely absolute energy use) which can be checked and verified against actual (metered) energy usage in the occupied building after completion. Option 1 however sets targets (percentage carbon reduction) relative to the Building Regulations Part L baseline, which is less tangible and hard to verify once a building is complete and in actual usage.

The preferred option is also considered stronger as it covers several metrics to separately measure each of the key attributes needed to achieve Net Zero: space heating demand for energy efficiency, total energy use and renewable energy generation (to offset total energy usage). This is considered more robust than the Part L Building Regulations option, which focuses on a single performance metric (reduction in regulated carbon emissions) so does not fully reflect the energy usage of a building (in operation) and energy production required to offset this.

The Council's evidence base modelled various building typologies to inform the standards set in both options, in order to ensure they are achievable and viable. It also demonstrated the relative strength of the preferred option compared to the continued use of Part L Building Regulations.

## Policy CN2: Energy Infrastructure

*Linkages:*

*NPPF Chapter*

*London Plan Policy: SI 3 Energy Infrastructure*

### Policy CN2: Energy Infrastructure

- A. Development proposals must be designed in response to a site-specific assessment of the most effective and efficient energy supply options that are capable of delivering net zero operational carbon, taking into account any local energy master plans where applicable.
- B. Major development proposals must adhere to London Plan requirements with regard to communal low-temperature heating systems, heating hierarchy and future connections to heat networks (London Plan Policy SI3 Energy Infrastructure, parts D and E).
- C. Major development must, and minor development should, maximise onsite renewable energy generation through the provision of rooftop solar photovoltaic (PV) panels, or other suitable renewable energy generation method.
- D. Where car parking is proposed in a development, electric vehicle charging infrastructure must be provided in line with the Harrow Electric Vehicle Strategy, and Policy M3 (Parking).
- E. The council will support standalone renewable energy infrastructure where it meets all other relevant aspects of this Local Plan.

### Explanatory text:

London currently sources 95% of its energy from outside the GLA boundary. In order to meet the GLA, and Harrow's zero-carbon targets, significant changes are required to the way electricity is generated and used. The West London electricity grid is under pressure from development, a growing population and a high concentration of data centres. There is growing pressure to adopt and deliver on net-zero targets in line with the Mayor of London's Accelerated Green Pathway, which aims for rapid and mass electrification of heating and transport across London.

Development must deliver electricity through local, clean and low-carbon sources, shifting away from fossil fuels and utilising a diverse range of heat sources and localised electricity generation options. This will ensure that Harrow becomes more self sufficient and resilient with regard to its energy generation, distribution and usage.

To achieve this, major development proposals must engage at an early stage with relevant energy suppliers and bodies to establish future energy and infrastructure requirements to support the development. Minor development proposals must

investigate the feasibility of incorporating on-site energy generation and low carbon heating options such as heat networks and heat pumps.

The West London Local Area Energy Plan (WLLAEP) provides context surrounding the current and future energy infrastructure and requirements of nine West London boroughs. The Plan aims to support a change in the energy efficiency of buildings and identify constraints and risks in energy transition, while planning for sustainable reinforcement of the grid. The plan and associated mapping should be a consideration in development across the borough as it relates to energy infrastructure, supply and demand.

### **Heat Networks**

Development proposals should prioritise connections to district heat networks where possible. The London Plan identifies Heat Network Priority Areas that identify where in London the heat density is sufficient for heat networks to provide a competitive solution for supplying heat to buildings and consumers.

Within Harrow and reflecting the spatial strategy of this Local Plan, the Harrow and Wealdstone Opportunity Area is considered to have greater potential for district heat networks, given the quantum of development, its density, existence of communal heat networks capable of connection in the future, and a number of large development sites being in Council / public ownership.

Major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system. The heat source must be selected in accordance with the London Plan heating hierarchy (see Policy SI3 Energy Infrastructure).

Where developments are proposed within Heat Network Priority Areas but are beyond existing heat networks, the heating system should be designed to facilitate cost-effective future connection. This may include, allocating space in plant rooms for heat exchangers and thermal stores, safeguarding suitable routes for pipework from the site boundary and making provision for connections to the future network at the site boundary.

### **Onsite Renewable Energy Generation**

Development proposals should maximise the amount of renewable and secondary energy generated on site. This includes the use of solar photovoltaics (PV), heat pumps and solar thermal, both on buildings and at a larger scale on appropriate sites. There is also potential for wind based renewable energy in some locations. Innovative low-and zero-carbon technologies will be supported. Rooftop PV panels should be low-lying and visually unobtrusive where possible, particularly in Conservation Areas.

**Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy CN3: Reducing Flood Risk

*Linkages:*

*NPPF Chapter*

*London Plan Policy*

### **Policy CN3: Reducing Flood Risk**

- A. Proposals will be required to apply the sequential and exceptions test (where necessary) in line with National Policy.
- B. Proposals that require a Flood Risk Assessment (FRA), in line with National Policy must demonstrate that the development will be resistant and resilient to all relevant sources of flooding including surface water. The design and layout of proposals requiring a FRA must:
  - a. Minimise the risk of flooding on site and not increase the risk of flooding elsewhere;
  - b. Wherever possible, reduce flood risk overall;
  - c. Ensure a dry means of escape for occupiers of the development; and
  - d. Achieve appropriate finished floor levels which, for residential development in flood zone 3 (subject to sequential and exceptions tests), should be at least 300mm above the modelled 1 in 100 year plus climate change flood level; and
  - e. flood resilience measures must be fitted to 0.5m above finished floor level.
- C. Proposals that would fail to make appropriate provision for flood risk reduction and mitigation, or which would increase the risk or consequences of flooding, will be refused.
- D. Sites that are mapped as falling within 'Developed' Flood Zone 3B will be treated as having a high probability of flood risk, for the purposes of applying the sequential and (where necessary) exception tests, provided that the development would be safe and would not increase the risk or severity of flooding elsewhere, opportunities will be sought from the redevelopment of sites in 'Developed' Flood Zone 3B to restore the natural function and storage capacity of the floodplain.
- E. Sites that are mapped within 'Greenfield' Flood Zone 3B will be treated as functional floodplain for the purposes of applying the sequential and exception (where necessary) tests. Proposals that involve the loss of undeveloped floodplain or otherwise would constrain its natural function, by impeding flow or reducing storage capacity, will be refused.
- F. Basement development will not be allowed on sites within Flood Zone 3B. Outside of these areas, development that involves the formation of new basements, or the change of use of existing basements, must have regard to flood risk and ensure that it is specifically addressed through the Flood Risk Assessment. The installation of resilience measures to basements will be required. Proposals for the formation of new dwellings or additional habitable accommodation within basements will be refused.
- G. Natural flood management methods should be employed in development proposals.

**Explanatory Text:**

The National Planning Policy Framework demonstrates the Government's commitment to pro-active management of development in relation to flood risk, and to planning for climate change impacts. It also tasks the planning system with preventing new and existing development from contributing to, or being put at unacceptable risk from, environmental water pollution and the remediation of historic pollution where appropriate.

The London boroughs are Lead Local Flood Authorities (LLFAs) and are responsible for local surface water flood risk management and for maintaining a flood risk management assets register. LLFAs are required to produce Flood Risk Management Strategies.

The policies in this chapter respond to the Borough's evidence base, in particular Harrow's Strategic Flood Risk Assessment, Local Flood Risk Management Plan and Strategy, and Surface Water Management Plan. A Hydrological Catchment Strategy is proposed to replace the Surface Water Management Plan 2012 and the Local Flood Risk Management Strategy 2016. This would replace the mapped critical drainage areas with hydrological catchment areas. This amendment to the evidence base may be made in 2024, prior to Regulation 19 consultation of the Local Plan.

Local Authorities are required to meet flood risk mitigation requirements whilst facilitating development needs.

The NPPF and accompanying PPG state that a sequential, risk-based approach to the location of development should be applied, with the aim of avoiding possible flood risk to people and property and taking the impacts of climate change into account. This is reinforced by London Plan Policy SI12.

The West London Strategic Flood Risk Assessments (SFRA)<sup>32</sup> / has identified in broad terms areas that are liable to flooding from rivers and ordinary watercourses within the catchments of the Rivers Brent, Colne and Crane, and the associated probability of flooding. It also identifies areas subject to surface water flooding. The strategic assessment informs spatial planning in the Borough and form a principal component of the evidence base that underpins planning policies and site allocations. Applicants should consider the findings of the SFRA when undertaking a site specific SFRA (where necessary), and ensure the requirements of the sequential and exception test are met.

In urban areas surface water is an additional source of flood risk. Rainwater falling onto impermeable surfaces such as buildings and hard surfaces has traditionally been disposed of via Harrow's surface water drainage network. Incremental urbanisation of the Borough and finite drainage network capacity has increased surface water flooding in recent years. Harrow's Surface Water Management Plan

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<sup>32</sup> <https://westlondonsfra.london>

(2012) identifies 15 critical drainage areas which extend over most of the borough and are susceptible to flooding from surface water and other sources.

Harrow's Local Flood Risk Management Strategy (2016) outlines the priorities for local flood risk management, assesses risk, provides a delivery Action Plan, and identifies roles and responsibilities of authorities.

The Harrow Infrastructure Delivery Plan has identified existing and planned flood alleviation schemes. These schemes aim to mitigate both identified and predicted flood risks, while considering the cumulative impact of development.

Harrow will work with the West London LPA and Strategic Flood Group to adopt a catchment based approach to flood alleviation, and the collection and use of developer contributions to fund mitigation measures.

Proposed site allocations for development will be subjected to sequential and exception tests where necessary as part of the Local Plan process.

Some of the Borough's open spaces contain river corridors and form a part of the functional flood plain. The modelled flood extents illustrated on Harrow's flood maps represent the best available information about the strategic risk of flooding. Consideration must be given to areas within the functional floodplain, which represent the most frequent and serious risk of flooding. The NPPF requires Local Plans to identify Flood Zones (3B). Harrow has made a distinction between Greenfield Zone 3b and Developed Zone 3b. Undeveloped floodplain, defined as Flood Zone 3B within areas designated as Green Belt, Metropolitan Open Land or open space on the Policies Map, is of particularly high value within the urban context. It provides unimpeded space where water is able to flow or be stored during times of flood. However, much of the Borough is already urbanised with many rivers culverted, changing their behaviour in response to rainfall and flooding. Previously developed land within the floodplain, defined as Developed Flood Zone 3B on land not designated as Green Belt, Metropolitan Open Land or open space on the Policies Map, provides opportunity through development to realise flood risk management and reduction objectives outlined in this policy.

All Flood Zone 3B land represents land where water has to flow or be stored in times of flood, therefore it remains essential that development in this zone is designed to be safe and does not displace flood risk to land elsewhere in the borough.

### **Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.



## Policy CN4: Sustainable Drainage

*Linkages:*

*NPPF Chapter*

*London Plan Policy*

### **Policy CN4: Sustainable Drainage**

- A. All development is required to reduce the risk of surface water flooding, through separating foul and surface water flows, and incorporating Sustainable Urban Drainage Systems (SuDS) where necessary to control discharge rates, reducing surface and storm water run-off. Greenfield run off rates should be achieved. The drainage hierarchy identified in London Plan Policy SI13 (Sustainable Drainage) should be applied to all development.
- B. The design and layout of major development proposals will be required to:
  - a. Maximise the use of Sustainable Urban Drainage Systems to control the rate and volume of surface water run-off, and follow the London Plan Drainage Hierarchy (Policy SI13);
  - b. Ensure separation of surface and foul water systems;
  - c. Make reasonable provision for the safe storage and passage of flood water in excessive events; and
  - d. Ensure adequate arrangements are in place to secure the long-term responsibility for the management and maintenance of on-site infrastructure;
- C. Proposals for minor developments, householder development, and conversions should make use of sustainable drainage measures wherever feasible and must ensure separation of surface and foul water systems.
- D. There is a presumption against impermeable hard standing on residential gardens and public open space. No impermeable hard standing will be permitted if it fails to control and reduce surface water runoff.
- E. Proposals that would fail to make adequate provision for the control and reduction of surface water runoff will be refused.

### **Explanatory Text:**

Ongoing population growth and development has increased pressure on drainage infrastructure. To alleviate this pressure, development needs to utilise sustainable drainage methods. Increased development and hard surfacing has resulted in additional incidents of overland flows and flooding due to insufficient natural drainage.

Harrow, in partnership with the North-West London Strategic Flood Group will work with providers to identify and undertake work to design and install strategic flood storage and attenuation drainage solutions.

Drainage should be designed and implemented in a partnership manner that promotes multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation. The London Sustainable Drainage Action Plan addresses and promotes the awareness and retrofitting, of sustainable drainage systems across London, and should be followed as an example of good practice.

Approaches to surface water management that consider flooding, pollution, biodiversity and amenity are referred to as Sustainable Drainage Systems (SuDS). SuDS systems are generally considered the best practice approach to surface water management as they provide flow on effects and replicate natural water catchments and storage systems. SuDS measures aim to manage surface water runoff as close to the source as possible. A strong preference is given to green over grey drainage features. Developments should follow the sustainable drainage hierarchy identified in London Plan Policy SI13 (Sustainable Drainage).

The London Sustainable Drainage Proforma sets the standard for information required in a Sustainable Drainage Strategy and must be utilised by applicants to avoid delays in the planning process.

Thames Water has raised concerns around drainage and sewer network capacity across several proposed development sites identified in their Drainage and Wastewater Management Plan (Drainage and Wastewater Management Plan | Thames Water). For major applications, a Surface Water Drainage Strategy will need to be produced by developers in liaison with Thames Water Develop Services. This is to include a detailed model of the network capacity to determine if mitigation is required. The Drainage Strategy is required to ensure any appropriate mitigation, including network upgrades, are undertaken ahead of occupation of the development, and should detail:

- Pre and post development runoff rates and water quality impacts, ensuring run-off is clean and safe; and
- Ownership, management and maintenance plan arrangements of any Sustainable Urban Drainage System features.

Where greenfield runoff rates cannot be achieved this should be clearly justified by the applicant. The fact that a site is previously developed and has an existing high run-off rate will not constitute justification.

New hardstanding should be made from permeable materials. Development proposals will be expected to utilise permeable surfacing and include an ownership, management and maintenance plan as part of any planning application. The collection of water through tanks is encouraged as it creates resilience to drought and flooding.

### **Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy CN5: Waterway Management

*Linkages:*

*NPPF Chapter*

*London Plan Policy*

### Policy CN5: Waterway Management

- A. Development proposals should seek to maximise the multifunctional social, economic and environmental benefits of rivers and waterways.
- B. The design and layout of development on sites where there is a main river or ordinary watercourse within, adjacent to or abutting the site boundary will be required to maintain an undeveloped buffer zone of 8 metres either side of a main river, 5 metres either side of an ordinary watercourse, or an appropriate width as may be agreed by the Environment Agency or Council LLFA.
- C. Applications for major development on sites containing a main river or ordinary watercourse within the site boundary will be required to:
  - a. Have regard to the relevant provisions of the Thames River Basin Flood Risk Management Plan<sup>33</sup>;
  - b. Investigate and, where necessary, secure the implementation of environmental enhancements to open sections of river or watercourse; and
  - c. Investigate and, where feasible, secure the implementation of a scheme for restoring culverted sections of river or watercourse which must include an adequate buffer for flooding and maintenance purposes.
- D. Where on-site enhancements or deculverting are financially viable but not feasible, the Council will seek a financial contribution towards relevant other projects for the enhancement or deculverting of other sections of the river or watercourse.
- E. Proposals that would adversely affect the infrastructure of main rivers and ordinary watercourses, or which would fail to secure feasible enhancements or deculverting, will be refused.

### Supporting Text:

Watercourses in Harrow form part of the complex network of rivers and streams within the London basin that drain to the River Thames. All the watercourses in Harrow originate within the Borough, reflecting Harrow's location at the upper reaches of the natural drainage system in London, and form part of catchments for three of the principal tributary rivers to the Thames: the Brent, the Colne and the Crane. Of the total 93.39 km length of water courses that run through Harrow,

<sup>33</sup> (Thames River Basin District Flood Risk Management Plan 2021 to 2027 ([publishing.service.gov.uk](https://publishing.service.gov.uk)))

39.65km (just under 43%) is culverted. Today, watercourses are valued as an important resource both for biodiversity and for sustainable flood management. As previously developed sites come forward for redevelopment, these offer the opportunity to maintain and enhance the natural functioning of the watercourse, or where culverted, to restore the watercourse back to a more natural state. All water courses should aim to have a minimum of 'good' status under the Water Framework Directive (<https://www.legislation.gov.uk/ukxi/2017/407/contents/made>).

The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 aims to improve the condition inter alia of surface waters including rivers and lakes having regard to biological, physical and chemical qualities. To contribute to the objectives of the Directive any activities or developments within an area of river, watercourse or water body must not cause deterioration and should enhance the condition of the river, watercourse or water body. Specifically, activities and developments should promote sustainable water use, reduce pollution and achieve 'good ecological status or potential'. The Borough's network of main rivers and ordinary watercourses are mapped in the West London Strategic Flood Risk Assessment (2018 Live).

The London Plan (2021) highlights the strategic role of waterways and their multifunctional benefits. As London's waterways cross boundaries, it is important to take an area catchment based approach to waterway management and work closely with other West London Boroughs to ensure a cohesive and multi-beneficial approach.

### **Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

# **Chapter 09: Managing Waste and Supporting the Circular Economy**

## Strategic Policy 09: Managing Waste and Supporting the Circular Economy

*Linkages:*

*NPPF Chapter*

*London Plan Chapter*

### Strategic Policy 09: Managing Waste and Supporting the Circular Economy

- A. The Council supports sustainable waste management and will:
  - a. Aim to reduce the amount of waste produced in the Borough and promote waste self-sufficiency in line with London Plan policy SI8;
  - b. Promote waste as a resource and encourage the increased re-use of materials and recycling in line with Circular Economy principles and London Plan policy SI7;
  - c. Require all new development to address waste management at all stages of a development's life from the design and construction stages through to the end use and activity on site. This will ensure all waste is managed towards the upper end of the waste hierarchy;
  - d. Safeguard existing waste sites in line with the West London Waste Plan 2015 or any subsequent documents;
  - e. Require the provision of additional compensatory land with equal or greater waste management capacity, to replace any loss of a waste management site; and
  - f. Work in conjunction with its partners in West London, to identify and allocate suitable new sites for waste management facilities within any replacement to the West London Waste Plan, to provide sufficient capacity to meet the apportionment requirements of the London Plan.
- B. Development proposals for new waste management sites will be assessed using the West London Waste Management Plan, and the London Plan, including impacts of the proposal on the local environment and residential amenity.
- C. Proposals for new waste management facilities, extensions and alterations should be appropriately designed and contribute positively to local character.

#### Explanatory Text:

As the population of Harrow increases, so does its waste collection and management requirements. The London Plan states that waste must be managed sustainably through the minimisation of waste, and the safeguarding and optimisation of waste management sites.

In partnership with the West London Waste Authority, Harrow has collaborated with neighbouring local authorities to proactively plan for our future waste infrastructure

needs in line with the West London Waste Strategy and the West London Waste Plan. The strategy is renewed every three years with the shared vision of reducing reliance on landfill and working towards being net self-sufficient. It is proposed that the West London Waste Plan is updated to reflect the new requirements and waste apportionments in the London Plan 2021.

The strategy identifies current capacity, waste management sites for protection and enhancement, and anticipated future demand. Both the strategy and the Waste Plan should be referred to when developing plans for any waste management site.

**Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy CE1: Reducing and Managing Waste

*Linkages:*

*NPPF Chapter*

*London Plan Chapter*

### **Policy CE1: Reducing and Managing Waste**

- A. All proposals will be required to make on-site provision for general waste, the separation of recyclable materials and the collection of organic material for composting. On-site provision must:
  - a. Ensure there is adequate space for temporary storage of waste generated by that site allowing for the separate storage of recyclable materials pending collection;
  - b. Ensure safe access for collectors and, where relevant, collection vehicles; and
  - c. Be located and screened to mitigate amenity impacts (odour, vermin, noise) to occupiers and adverse visual impact.
- B. All proposals for major development should promote circular economy outcomes and aim to be net zero-waste. Applications should include a circular economy statement in accordance with London Plan policy SI 7.
- C. Residential development proposals for new dwellings and conversions have regard to the guidance in the council's waste management standards, and ensure that:

#### **Flatted development**

- a. There is adequate space within each flat/apartment for the temporary storage of waste generated by the dwelling, allowing for the separate storage of recyclable materials;
- b. There is adequate accessible communal storage for waste, including separate recyclables pending its collection;
- c. Storage and collection systems (e.g. dedicated rooms, storage areas, chutes or underground waste collection systems) for waste are of high-quality design and enable adequate, convenient access for all residents and waste collection operatives;
- d. Measures are incorporated to manage amenity impacts to acceptable levels, including odour, noise, vermin and dust;
- e. The on-site treatment of waste has been considered and any system to be incorporated will take into account of the factors listed above; and
- f. Adequate contingency measures are in place to manage any breakdowns of any mechanical equipment that may be required for the movement and storage of waste.



**Other residential development**

- g. There is adequate space within each dwelling for the temporary storage of waste generated, allowing for the separate storage of recyclable materials; and
  - h. There is adequate external storage space for waste, including separate recyclables, pending its collection.
- D. Proposals for all types of new development should be accompanied by a recycling and waste management strategy that considers the above matters and demonstrates the ability of the new development to meet local authority waste management recycling targets.

**Explanatory Text:**

Recycling rates in London have historically been quite low due to the limited availability of communal and household storage space, and poorly designed buildings.

Evidence shows that recycling rates for communal flat collections are significantly lower than those from individual household kerbside collections. This is due to a complex set of circumstances including the communal nature of collections, inconsistent and often poor collection provision, poor bin storage, and a lack of knowledge, ownership and engagement from residents. This is also the case in some office and commercial buildings. To address this issue, greater consideration must be given to the design of buildings in relation to waste management.

In order to meet the waste management targets set in the London Plan and protect amenity, proposals for new developments should include a detailed waste storage and management strategy. The scope of this strategy should be commensurate to the scale of development and provide detail relating to the management of waste arising from the occupation of the building including plans to indicate how waste will be stored, collected, and managed. Details regarding the storage and reuse of construction materials on site should also be submitted in line with circular economy principles.

Appropriate types of storage and collection systems for waste will depend on the type of development proposed. Examples of development typologies include HMOs, live/work accommodation and residential institutions, including specialist housing for older people, and student accommodation, as well as office and commercial spaces. The Council has adopted a Waste Strategy that provides guidance for flats and HMO dwellings, this guidance should be considered early in the design phase of any development to ensure its efficacy.

All development should respond to waste management guidance set out in the NPPF, London Plan and Re:London guidance.

**Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy CE2: Design to Support the Circular Economy

*Linkages:*

*NPPF Chapter*

*London Plan Chapter*

### **Policy CE2: Design to Support the Circular Economy**

- A. Development proposals should apply circular economy principles in order to conserve resources and improve resource efficiency, with reference to London Plan policy SI7 (Reducing waste and supporting the circular economy).
- B. Major development proposals should aim to be net zero-waste. Any development proposals referred to the Mayor of London are required to submit a Circular Economy Statement in compliance with London Plan policy SI7.
- C. Consideration of Circular Economy principles should be given to the construction and operation of all types of development. Demonstration of circular economy considerations will be looked upon favourably in planning applications.

### **Explanatory Text:**

A circular economy is achieved by keeping materials in use for as long as possible, delivering the highest value, for as long as they can. The circular economy is the opposite of a linear economy where things are made, used and then thrown away. To achieve the circular economy and minimise embodied carbon in buildings we need to look for new ways to manufacture, select, use and reuse materials, particularly reusing materials on site from old buildings and incorporating them in new buildings.

All development should aim to minimise waste and maximise recycling of materials in new developments.

### **Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

# **Chapter 10: Transport and Movement**

## Strategic Policy 10: Movement

*Linkages:*

*NPPF Chapter*

*London Plan Chapter*

### **Strategic Policy 10: Movement**

Travel in Harrow will be designed and integrated around communities to support everyday journeys and drive long-term sustainable growth, minimising private vehicle travel where possible. To achieve this, The London Borough of Harrow is committed to creating more pleasant neighbourhoods and town centres with better air quality, safer streets, improved accessibility and sustainable travel opportunities for all.

Public and active transport travel networks will be enhanced to become attractive alternatives to private vehicles. Those travelling through the borough will be encouraged to shift towards these healthier and greener choices. This will support the borough's mission to decarbonise transport, ensure infrastructure is resilient to climate change, and secure Harrow's long-term status as an attractive location for residents, workers and visitors.

To achieve the above vision:

- A. Development proposals must facilitate improvements to transport infrastructure through active travel, and the public transport network to deliver safe, accessible, inclusive, healthy, walkable and sustainable neighbourhoods.
- B. Development must make effective use of land, improving its connectivity and accessibility to existing and future public transport, walking and cycling routes, and mitigating any adverse impacts on London's transport networks and supporting infrastructure.
- C. The Council will seek to improve access to public transport, particularly in areas of deprivation and for people with a disability, by working with Transport for London (TfL) to promote and improve public transport infrastructure and all abilities access to this.
- D. The Council will apply the Healthy Streets Approach to transport outlined in the Mayor of London's Transport Strategy (2018), and any subsequent Transport Strategy.
- E. The Council will seek to encourage and enable people to choose active transport by improving walking and cycling infrastructure across the borough. Improvements to road safety will be made to facilitate this.
- F. The Council will seek to reduce vehicular emissions through supporting a switch to electric vehicles and car clubs, and encouraging efficient, low-emission freight and delivery trips.

## **Supporting Text:**

### **Context**

A decarbonised, integrated, safe and accessible transport system is a vital requirement of the inclusive and healthy borough that the Council is working to create. Transport connects people to jobs, goods to businesses, and provides opportunities for education and leisure so that everyone benefits from sustainable economic growth.

The NPPF requires transport issues to be considered at the earliest stages of plan making and development proposals to address the potential impacts of development on transport networks, and realise opportunities presented by transport infrastructure, active travel, public transport, and climate change mitigation. Careful consideration needs to be given to the design of schemes so that they contribute to the making of high-quality places.

As identified in the Mayor of London's Transport Strategy(footnote), the only realistic way to address some of the transport challenges problems is to reduce dependency on cars in favour of active, efficient and sustainable modes of travel. The Mayor's Strategy has set a target for 80% of all trips in London to be made on foot, by cycle or using public transport by 2041. The Healthy Streets Approach identified in the Strategy is also central to the development of healthy and sustainable streets across Harrow.

The Harrow Long Term Transport Strategy (LTTTS) provides the policy framework for the planning and delivery of improved transport infrastructure and services in Harrow. The Strategy aims to address current barriers that affect the movement of people and goods and respond to the declared climate emergency.

### **The Challenge**

Harrow, as an outer London Borough, still has higher than average rates of private vehicle use however, there has been a significant uptake in electric vehicle usage in recent years. The Council will support the transition to sustainable transport by enabling the use of electric private vehicles where necessary, and through providing infrastructure to increase rates of active and public transport.

While private car use will continue to have a role in the borough during the Local Plan period, enabling people to make more active travel choices as part of their daily lives will play an important role in improving health and wellbeing, and reducing dependence on private vehicles.

A shift to sustainable travel modes and lower emissions vehicles will also be vital enable Harrow to decarbonise its activities by 2030 and reduce air pollution. To encourage higher levels of public transport usage, additional bus routes with enhanced connectivity will be sought in and through the borough. The Council will work with TfL and other partners to deliver additional bus routes and services.

This chapter aims to ensure that people are able to freely, safely, efficiently and sustainably move around and through the borough. Everyone should have access to sustainable neighbourhoods that provide for day-to-day needs without requiring a private vehicle.

The policies set out in this chapter have cross cutting objectives with most other policies in this Local Plan, in particular those relating to climate change, health, air quality, and good design.

**Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy M1: Sustainable Transport

*Linkages:*

*NPPF Chapter: 9 Promoting Sustainable Transport*

*London Plan Chapter: 10 Transport*

### **Policy M1: Sustainable Transport**

- A. Development must:
- a. Contribute to the delivery of sustainable neighbourhoods through the enhancement of cycle and pedestrian connections, and other forms of sustainable travel, to local destinations, town centres, transport hubs, schools and amenities;
  - b. Design new development in accordance with the London Plan's Healthy Streets approach, prioritising safe and convenient access routes for pedestrians, cyclists and those with disabilities;
  - c. Protect and enhance any existing publicly accessible cycle and pedestrian routes that cross development sites and maximise opportunities to improve public accessibility by providing new connections through sites;
  - d. Support the delivery of strategic or local cycle networks in and through the borough;
  - e. Provide accessible, secure, and convenient cycle parking for all users, located in prominent locations, which meet or exceed London Plan requirements and London Cycle Design Standards. Facilities should include provision for charging of electric bikes.
  - f. Deliver accessible cycle parking for people using cargo bikes or adapted cycles, and for people who may not be able to lift bikes;
  - g. Provide a development contribution towards publicly accessible cycle parking and dockless cycle and scooter hire schemes where required;
  - h. Provide well-designed, accessible facilities including prominent, accessible and well-located showers, changing rooms and lockers.
- B. Major development proposals must demonstrate through the submission of a Travel Plan and Transport Assessment, (or a Transport Statement for Minor development proposals) that the negative impacts on the transport network have been considered, identified and mitigated, supporting modal shift away from private vehicles.

### **Supporting Text:**

The London Plan aims to enable a boom in active travel with walking and cycling becoming the primary, default choice because it has been made easier and safer. Active travel requires journeys to be made through physically active modes such as walking, cycling, skateboarding, scooters, etc.



Walking and cycling are environmentally friendly, healthy, cheap and reliable forms of transport that provide a realistic alternative to the car for many short trips. Active travel choices are one of the easiest ways to integrate regular exercise into a daily routine, enhancing physical and mental health incidentally. All development must aim to facilitate active travel choices, as good planning can make it easy for people to build activity into their daily lives.

Development can enable active travel through contributing to convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns. Much of this can be facilitated through the masterplanning process of town centres and transport corridors, in which the development of specific sites will contribute via planning obligations, or on-site provision.

At present, car travel is still the dominant mode of transport in Harrow, with a particularly low cycling mode share. The borough has somewhat poor public transport accessibility and low levels of step free access at rail and tube stations. Many opportunities exist to realise the potential Harrow has to create a robust, green and inclusive transport system. These opportunities are planned for in Harrow's Long Term Transport Study (2023), which should be read in conjunction with the Mayor of London's Transport Strategy (2018). These documents should be used to inform future development proposals and decision making around transport in the borough.

### **Minimising the Impact of Development**

Applicants must minimise the adverse impact of development on the surrounding area and ensure that developments are consistent with policy objectives. To achieve this, the likely impact of development needs to be assessed through planning applications. The mitigation of any development should focus on reducing the need for, and impact of, private vehicles and provide increased opportunities for sustainable access through public transport, walking and cycling.

Different types of development will have different impacts on the environment and local surroundings. The impact of the development may be influenced by the following aspects:

- Scale of development
- Proximity to employment, town centres, services (retail / leisure etc) and community infrastructure
- Characteristics of people using / visiting the development
- Construction time
- Servicing facilities
- Proximity to public transport (PTAL Levels)
- Surrounding road network and local service roads
- Building accessibility
- Available car parking
- Available car clubs
- Availability of electric vehicle charging facilities

- Local car ownership
- Local traffic conditions
- Availability of parking permits
- Local parking restrictions
- Walking and cycling ease
- Wayfinding and legibility
- Bike hire facilities
- Cycle path availability

### **Transport Assessments:**

Transport Assessments consider the impact of development on all forms of transport and explain how these impacts will be dealt with. Transport Assessments provide information on transport conditions and transport issues before, during and after completion of the development. Assessments should address impacts to public transport, the highway network, the strategic and local cycle network, and impacts on cyclists and pedestrians.

Transport Assessments need to demonstrate that the development will not have a negative impact on safety, cause congestion or lead to illegal or additional parking near the site of the proposed development. They must also show how the development is going to restrict car dependency, and improve, provide and promote sustainable travel through public transport and active travel.

Where multiple major developments are proposed an area, the Council will encourage developers to cooperate to assess the cumulative impacts of the proposals on the transport network. Transport Assessments should be proportionate to the scale of the development proposal. A transport assessment may still be required for smaller developments where the proposal is likely to have a significant transport impact. This will be agreed with applicants at pre-application stage.

### **Transport Statements:**

Transport Statements are a simplified Transport Assessment prepared as part of a smaller scale development application where the impact on local transport networks is likely to be of a smaller scale.

Applicants should demonstrate that the development proposal satisfies the Council's transport policies through a Transport Statement. The scope of any transport statement should be agreed with the Council at pre-application stage in discussion with Traffic and Highways. A Transport Statement should outline the existing site conditions and the proposed transport aspects of the development design (parking, site access points, servicing arrangements, access to public transport, cycle parking provision).

**Travel Plans:**

Travel Plans are an agreed set of measures that reduce reliance on private vehicles and as a result, reduce the impact of travel and transport on the environment (i.e car clubs, bike hire/storage, etc). This contributes to a reduction in fossil fuel use, energy consumption, the need to travel and reduced air pollution.

Travel Plans seek to ensure that once a development is occupied and operational, the management / mitigation measures identified through the transport assessment are implemented and their effectiveness monitored. Travel Plans play an important role in bringing forward initiatives that contribute to the achievement of a modal shift away from car use.

While Travel Plans should be developed as a standalone document, they should aim to address any issues identified within the associated transport assessment through the promotion of sustainable transport.

Travel Plans must be submitted as part of the initial planning application, alongside the Transport Assessment. Travel Plans will be secured by way of a condition on the permission or a S106 planning obligation, which the applicant will need to continue to implement and manage over the lifetime of the development. The Council will require developer contributions by planning obligation for the monitoring and review of Travel Plans.

**Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy M2: Parking

*Linkages:*

*NPPF Chapter*

*London Plan Chapter*

### **Policy M2: Parking**

- A. Proposals that make on-site provision for parking will be supported where:
  - a. the number of vehicle parking spaces (including those with electric vehicle charging points) complies with the maximum London Plan standards;
  - b. there is provision for 1 motorcycle parking space per 20 car parking spaces subject to all developments with more than 10 car parking spaces having a minimum of 1 space; and
  - c. the number of cycle parking spaces would meet or exceed the minimum London Plan standards and comply with London Cycle Design Standards.
- B. Proposals involving parking provision that would not be consistent with the London Plan will be assessed having regard to any exceptional operational requirements and satisfactory mitigation, any special safety considerations and the desirability of achieving modal shift away from private car use.
- C. Proposals that secure the delivery of car club schemes in lieu of parking provision for private vehicles will be encouraged.
- D. The design and layout of parking areas (including those for scooters, motorcycles and bicycles) should be safe, secure and fit for purpose. Access to and from the public highway should maintain and, where necessary, improve safety and give priority to the convenience of pedestrians and cyclists.
- E. Proposals that would result in inappropriate on-site parking provision, having regard to the supporting text in this policy, and those which would create significant on-street parking problems, prejudice highway safety or diminish the convenience of pedestrians and cyclists, will be resisted.
- F. Off-street parking should provide adequate soft landscaping, permeable surfaces and appropriate boundary treatments to offset adverse visual impacts and increases in surface water run-off. Parking on front gardens should provide a minimum 50% coverage of soft landscaping and permeable surfaces. Car park entrances must be of an acceptable width to ensure safe access and visibility.
- G. Development in Town Centres should prioritise walking, cycling and public transport. The public realm will be designed to support modal shift away from car use. London Plan car parking maximums for office, retail and hotel accommodation must be complied with.
- H. Any proposed reduction of car parking (either on-street or off-street) should have regard to the overall parking provision in the centre, and should not adversely impact upon town centre vibrancy and vitality. Proposals to improve the quality of existing off-street car parking will be supported and encouraged.

**Supporting Text:**

Parking for new development will be managed to contribute to the delivery of a modal shift from private cars to more sustainable modes, with an emphasis on active travel and public transport. Development should provide parking in accordance with standards set by the London Plan.

Car free developments should be the starting point in areas that are well connected to public transport (PTAL 4-6). Developments in areas with lower public transport connectivity (PTAL0-1) should adhere to both minimum and maximum parking standards as set by the London Plan.

All development must include infrastructure for EV and ultra-low-emissions vehicles in conformity with London Plan Policy T6 (G). Proposals with higher rates of EV charging infrastructure (>50% of overall spaces) will be looked upon favourably. Integration of bike and car sharing clubs should be strongly considered.

Households in Harrow continue to exhibit comparatively high levels of car ownership. It is likely that car ownership will continue to be a preference for many residents and that this mode will continue to be a component of economic activity and outer London inter-connectivity for the foreseeable future.

The objective of this policy is to realise the transport benefits of Harrow's spatial strategy by ensuring that proposals contribute to modal shift and meet the transport needs of future occupiers of developments. This will be achieved by focusing new development in areas of high public transport accessibility and where access to services is possible by sustainable transport modes such as walking and cycling.

Transport is a matter of strategic significance to London as a whole and is therefore addressed in the NPPF (2021) and the London Plan (Chapter 10 Policy T6). The London Plan sets standards for car parking of all types, development proposals must comply with these standards.

There is greater demand for car use in outer London given its lower-density, suburban nature and lower levels of public transport accessibility and sustainable transport options. Due to the demand generated by occupiers and users of development in outer London it is anticipated that developers will continue to seek to provide parking as part of their proposals. In many instances some level of vehicle parking is likely to be necessary for operational reasons. On-site provision of vehicle parking often overcomes issues with on-street parking particularly in residential areas where on-street parking can result in congestion and hindrance to traffic flow.

The London Plan specifies maximum general parking standards. Minimum standards are set with respect to disabled parking, cycle parking and the percentage of car parking spaces that must have active provision for electric vehicle charging. London Plan guidance must be followed as it refers to outer London PTAL levels, and space numbers must not exceed the maximum standard outlined in the London Plan. Minimum parking standards must be provided in areas with a PTAL score of 0-1.

Car free developments are those that make no general on or off-site provision for car parking other than that required to meet the needs of disabled persons. Where located in areas of high public transport accessibility levels (PTAL4-6) and access to services through sustainable transport modes, such schemes are an effective means of delivering a modal shift away from private car use. New development must

demonstrate that future occupiers' ability to access their reasonable shopping, service and employment needs would not be disadvantaged, and that visitors and other users of the development (particularly in respect of non-residential uses) would not be severely disadvantaged by the absence of car parking. In Harrow, the Harrow & Wealdstone Opportunity Area and town centres with a PTAL of 4-6 provide the most suitable locations for car-free development. They provide occupiers with direct access to local shops, services and employment opportunities, and are generally served by multiple local bus services and/or a rail station for access to shops, services and employment elsewhere.

Applicants should provide detailed Parking Design and Management plans as part of any application proposing implementation of car parking. The Plans should detail all aspects outlined in the London Plan.

Development in the Harrow & Wealdstone Opportunity Area and Town Centres should prioritise walking, cycling and public transport. Infrastructure to support modal shift away from fossil fuel car use should be prioritised by any development including:

- Safe and secure bike parking (ideally covered with CCTV in operation in accordance with London Cycling Design Standards);
- Rapid electric vehicle charging points;
- Parking spaces for shared electric bikes and scooters;
- Installation of cycle lanes;
- High quality pedestrian thoroughfares.

### **Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.

## Policy M3: Deliveries, Servicing and Construction

*Linkages:*

*NPPF Chapter*

*London Plan Chapter*

### **Policy M3: Deliveries, Servicing and Construction**

All development proposals should seek to minimise the adverse impacts of deliveries, freight and servicing by:

- A. Reducing the number freight, servicing and delivery trips to and from developments at the construction and operational phases;
- B. Demonstrating through the submission of a Construction Management / Logistics Statement, any impacts on the transport network during the construction phase of the development (including road closures and damage to the transport network) will be managed and mitigated to the satisfaction of the Council.,
- C. Demonstrating that the proposal and site layout make adequate provision for emergency services access, deliveries, servicing, refuse collection, and visitor drop-off and pickups.
- D. Arranging construction deliveries outside of peak hours and in the evening or night-time.
- E. Where appropriate, promoting facilities to enable efficient online retailing and minimise additional freight trips arising from missed deliveries, including storage lockers or concierge services.
- F. Facilitating efficient, safe and low-emission delivery and servicing trips in accordance with TfL's latest guidance on Delivery and Servicing Plans.

### **Supporting Text**

#### *Construction Logistics*

The construction phase of development can present significant logistic and environmental challenges particularly for large, complex and constrained sites or sites that are located in town centres, residential areas or near schools. Construction typically generates a significant number of vehicle trips, often involving heavy goods vehicles and machinery. These trips should be considered and mitigated to minimise disruption and safety hazards in accordance with TfL's Construction Logistics Plan Guidance. Any damage to road surfaces caused by vehicle movements to, from and around the development site will be repaired at a cost to the applicant. The Construction Logistics Plan should prioritise the maintenance of safe and inclusive access for pedestrians, cyclists and public transport users.

Construction works will need to secure the necessary approvals and licenses from the Council's Highways Department a minimum of 60 days before commencement of

works. Financial contributions may be sought to ensure that disruption to roads is minimised, and any damage is repaired.

### *Deliveries and Servicing*

Deliveries and servicing are often thought of late in the design of developments, which can lead to poor outcomes for occupants and disruption to the highway network. To avoid this, the logistics of servicing and deliveries must be considered early in the design of developments.

Since the pandemic there has been an increase in online shopping and home deliveries leading to increase delivery trips, often using heavy goods vehicles. This results in more traffic on the roads, particularly using larger vehicles that stop often for pick-ups and drop-offs. These vehicles can cause congestion and are often required to stop in areas not designated for loading, which can in turn disrupt traffic, cyclists, pedestrians and parking. Ensuring that there is a safe and easily accessible area for goods and servicing vehicles in the early stages of development must be a priority.

Where a development is likely to generate a significant amount goods or delivery vehicles trips, a Delivery and Servicing Plan will be required in accordance with TfL's latest guidance. These plans are required to improve the safety, efficiency and sustainability of delivery and servicing vehicles through interventions including consolidation, low carbon delivery modes and the retiming of movements to avoid peak hours. Consideration should be given to onsite electric charging infrastructure and parking to support low carbon fleets including e-cargo bikes, where appropriate.

Safe servicing access must be provided for recycling and refuse in accordance with Policy CE1 Reducing and Managing Waste.

An accessible, safe and secure postal storage area must be provided for postal servicing, including a secure parcel storage area to minimise parcel theft. Applicants are advised to discuss such elements with the Metropolitan Police (Secure by Design) early in the design of a scheme.

### **Reasonable Alternatives:**

This policy has been drafted to be consistent with national policy and in general conformity with the London Plan. It is considered there are no reasonable alternatives under national policy or the London Plan.



# Appendices:

## Appendix 1 – Glossary (in progress)

**Sheltered housing** These schemes typically offer self-contained accommodation for rent. It is accommodation specifically designed for older people aged 60 and over who can continue to live independently and manage their own tenancy, sometimes with some support from family, friends or support services. It offers a community, communal facilities and the security of knowing that help is close by if needed. Personal care is not provided by sheltered housing staff.+

**Retirement housing:** This is typically similar to sheltered housing, but it is usually built by private developers or in some cases by housing associations. Once all the properties have been sold, the scheme is usually run by a separate management company that employ the scheme manager and organise maintenance and other services

**Extra Care Housing** is a form of sheltered housing for older people who are becoming frailer and less mobile and have higher support and care needs than those that can be met in general needs or sheltered housing. It includes self-contained homes and communal facilities with design features and care and support services which enable self-care and independent living. It enables older people with a wide range of needs to remain living independently in the community, whilst being able to access care from staff available 24 hours per day if needed.

**Residential care home:** a residential setting where a number of older people live, usually in single rooms, and have access to on-site care services. Personal care services include help with washing and dressing.

**Nursing care home:** similar to a residential care home, but additionally providing personal care from qualified nurses. These are sometimes called ‘care homes with nursing’.

**To:****London Borough of Harrow Council****cc: Mohammed Azram and David Hughes****From:****SLR Consulting Limited****Date:** 19 January 2024**Project No.** 430.000059.00001**RE: Local Plan IIA, Preferred Policies and Alternatives Assessment Findings, Draft Technical Note**

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## 1.0 Introduction

This memo sets out the methodology and draft findings of the Integrated Impact Assessment (IIA) of the preferred Local Plan policies and their alternatives. The IIA is a combination of Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA) requirements. It identifies potential impacts on protected groups and health outcomes and helps to identify opportunities within the power of the Local Plan for more positive outcomes for protected groups and health. In addition, the Habitats Regulation Assessment (HRA) screening will be reflected in the IIA Report and in a separate HRA Screening Statement.

An IIA Framework (see Appendix 1) was developed in the first stage of the IIA (Stage A: Scoping) to provide a set of objectives against which to identify the potential positive, negative, health, equalities, environmental, economic and social effects of the Local Plan policies and their alternatives. The overall aim of the IIA is to maximise the potential positive effects; minimise or mitigate potential negative effects and uncertainty; and to promote sustainable development.

This memo provides a summary and commentary of the relative performance of the preferred policies and their alternatives, providing information to London Borough of Harrow Council (LBHC) officers to inform discussions with Members. The assessments have been undertaken in detailed excel spreadsheets which will be provided to officers for review, at a future date. The IIA findings will therefore be refined over the coming weeks as the detailed assessment is reviewed and finalised with officers.

## 2.0 Methodology

The IIA is now in the second stage (Stage B: Options Assessment). Preferred policies for the Local Plan were provided to SLR in chapters. Reasonable alternatives to the draft Local Plan policies have also been assessed, where they have been identified in discussion between SLR and Council officers. 60 policies and 43 alternatives have been assessed in total. There may be ongoing amendments to the policies prior to consultation. These are likely to be related to clarity around drafting, factual updates and supporting text but not the policy positions themselves.

All policies and alternatives have been subject to assessment against the IIA Framework which can be found in Appendix 1. Assessments have been undertaken using detailed assessment matrices in Excel format. One matrix has been completed per policy. Where an alternative is sufficiently different to the preferred policy, it has been assessed using an assessment matrix in the same way as the preferred policy and to the same level of detail. Where an alternative is not sufficiently different to the preferred policy and an assessment would result in the same performance against the IIA Framework, a commentary has been provided by the assessors to explain this and discuss the differences between the preferred policy and the alternative.

The assessments of the policies and any alternatives have been undertaken by skilled and experienced assessors, using their professional judgement and with reference to baseline data from the Borough. The assessors consider specific requirements of the SEA Regulations including whether a potential effect could be indirect/direct, permanent or temporary, replaceable/irreplaceable, and the potential magnitude and duration. Table 2.1 explains how this is considered and how significance has been determined within the assessments by the assessors.

Mitigation measures have been put forward within the assessment tables to address potential negative and uncertain effects. These measures are intended to either offset a potential negative effect, reduce uncertainty or reduce the significance of a potential negative effect. Enhancement measures have also been put forward within the assessment tables to improve performance where either neutral or positive effects have been identified. Mitigation and enhancement measures will be provided to officers within the assessment tables and will also be presented within the IIA Report which is being prepared for consultation.

The IIA findings will continue to be refined as policies are amended as a result of consultation, further evidence and feedback within the IIA process.

Table 2.1: Significance definitions		
Symbol	Definitions of Significance of Effects Against the IIA Objectives	General assumptions on the nature of effects
++	<b>Significant Positive Effect:</b> the option or policy supports the achievement of this objective; it addresses all relevant assessment questions and could result in a potentially significant beneficial effect e.g. improved access by walking and cycling modes to a local or town centre	Permanent Continual Magnitude: High 80%+ receptor or environmental capacity affected; or Medium 40-80% of receptor or environmental capacity of affected The effect could be to: <ul style="list-style-type: none"> <li>• enhance and redefine a location in a positive manner, making a contribution at a national or international scale;</li> <li>• enhance and redefine a location in a positive manner;</li> <li>• repair or restore receptors badly damaged or degraded through previous uses; and/or</li> <li>• improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific regional or national designation.</li> </ul>
+	<b>Minor Positive Effect:</b> the option or policy supports the achievement of this objective; it addresses some relevant assessment questions, although it may have only a minor beneficial effect	Reversible Infrequent or intermittent Magnitude: Low 20-40% of receptor or capacity affected. The size, nature and location of a proposed scheme could: <ul style="list-style-type: none"> <li>• improve undesignated yet recognised receptor qualities at the neighbourhood scale;</li> <li>• fit into or with the existing location and existing receptor qualities;</li> <li>• affect a localised receptor; and/or</li> <li>• enable the restoration of valued characteristic features partially lost through other land uses.</li> </ul>
0	<b>Neutral Effect:</b> the option or policy has no impact or effect and is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant	N/A

Table 2.1: Significance definitions		
Symbol	Definitions of Significance of Effects Against the IIA Objectives	General assumptions on the nature of effects
?	<b>Uncertain Effect:</b> Uncertain or insufficient information on which to determine the assessment at this stage	N/A
-	<b>Minor Negative Effect:</b> the option of policy appears to conflict with the achievement of this objective; it does not address relevant assessment questions and may result in minor adverse effects	<p>Reversible</p> <p>Infrequent or intermittent</p> <p>Magnitude: Low 20-40% of receptor or capacity affected.</p> <p>The size, nature and location of a proposed scheme could:</p> <ul style="list-style-type: none"> <li>• be out of scale with the location;</li> <li>• affect a localised receptor; and/or</li> <li>• leave an adverse impact on a receptor of recognised quality such as a specific district or county designation.</li> </ul>
--	<b>Significant Negative Effect:</b> the option or policy works against the achievement of this objective; it does not address relevant assessment questions; it could exacerbate a negative situation and may result in a potentially significant adverse effect e.g. loss of all or part of a designated ecological site of national importance.	<p>Permanent</p> <p>Irreversible</p> <p>Continual</p> <p>Magnitude: High 80%+ receptor or environmental capacity affected; or Medium 40-80% of receptor or environmental capacity of affected</p> <p>The effect could be:</p> <ul style="list-style-type: none"> <li>• to permanently degrade, diminish or destroy the integrity of the receptor;</li> <li>• to cause a very high-quality receptor to be permanently changed and its quality diminished;</li> <li>• not fully mitigable and may cumulatively amount to a severe adverse effect;</li> <li>• at a considerable variance to the location, degrading the integrity of the receptor; and/or</li> <li>• substantially damaging to a high-quality receptor such as a specific regional or national designation.</li> </ul>

## **2.1 Assessment Assumptions**

Assumptions made have been recorded within the detailed assessment matrices. For example, for some alternatives, it has been assumed that the preferred policy forms the basis of the alternative policy wording, with only limited amends to certain parts of a policy or additional criteria being added.

A general assumption made during the assessments is that all of the preferred policies would be taken forward as proposed and that the policies within the Local Plan will not be considered on their own. More detail on the assumptions made in the assessments will be included within the IIA Report currently being prepared for consultation.

## **2.2 Assessment Limitations**

No site allocation options or preferred site options are available at the time of writing. Therefore, the preferred policies and any reasonable alternatives have been assessed using strategic spatial information (such as set out within the Spatial Strategy policy) and in the absence of any locally specific information on site allocations. This has limited the identification of the potential full effects of policies relating to the spatial strategy, housing and economic growth. Site allocation options and preferred options will be subject to IIA later in 2024.

### 3.0 Assessment Findings

The summary tables in this section present the sustainability performance of the 103 policies and alternatives of the draft Local Plan. The policies are arranged within the following chapters and this section uses the same structure:

- Spatial Vision
- High Quality Growth
- Heritage
- Housing
- Local Economy
- Community Infrastructure
- Green Infrastructure
- Climate and Nature
- Waste and Circular Economy
- Movement

For each group of policies, a summary table is presented which contains symbols and colours showing the potential sustainability effects against each of the IIA Framework Objectives. The key to the sustainability effect scores is shown in Table 3.1.

<b>Table 3.1: Key to Sustainability Significance Scores</b>	
<b>Potential Sustainability Effect</b>	<b>Symbol</b>
Significant positive	++
Minor Positive	+
Neutral	0
Uncertain	?
Minor Negative	-
Significant Negative	--

The policies and alternatives assessed are listed in the left-hand column of each summary table. The summary tables contain the performance of reasonable policy alternatives (shown in purple colour and italics) alongside the preferred policies in order to allow comparison.

A discussion of the performance of the policies within each chapter is provided under each summary table. The discussion also compares the performance of any reasonable alternatives identified and assessed.

Details of the policies and alternatives included within this memo can be found in Appendix B.



### 3.1 Performance of Spatial Strategy Policy and Alternatives

The Spatial Vision chapter includes one Spatial Strategy policy, as shown in the summary table below. Two alternatives to the spatial strategy have also been assessed.

**Table 3.2: Summary of Spatial Strategy Policy and Alternatives Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Spatial Strategy	++	+	+	+	++	++	+	+	0	+	+	+	+	0
<i>Spatial Strategy: Alternative 1</i>	++	+	+	+	++	++	0	0	0	+	+	++	+	+
<i>Spatial Strategy: Alternative 2</i>	++	+	+	+	++	++	+	+	0	--	--	--	--	0

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The Spatial Strategy policy generally performs well, with potential significant positive effects being identified in relation to IIA1 (Economy), IIA5 (Housing) and IIA6 (Sustainable Travel) for both the policy and its two alternatives. Potential significant positive effects have also been identified in relation to IIA4 (Health and Wellbeing) and IIA12 (Landscape and Townscape) for Spatial Strategy Alternative 1. Spatial Strategy Alternative 1 may have a more significant positive effect on IIA12 (Landscape and Townscape) as the policy text is more restrictive than the preferred policy text in terms of safeguarding vulnerable areas from development. For example, the text of Spatial Strategy Alternative 1 safeguards suburban areas as areas of low density, family housing in order to protect suburban character, as well as protects the Borough’s Metropolitan Open Land, Green Belt and other open space (including gardens) from development. This has resulted in a more positive performance of the Spatial Strategy Alternative 1 in relation to IIA12 (Landscape and Townscape) compared to the preferred policy. Although the rest of the preferred Local Plan policies do place restrictions on these matters it is not reflected so clearly within the preferred Spatial Strategy Policy text. It is therefore suggested

that should the text of the preferred Spatial Strategy Policy be amended and more detail on restrictions added, the policy could perform more positively in relation to IIA12 (Landscape and Townscape).

Four potential significant negative effects were identified for Spatial Strategy Alternative 2 in relation to IIA10 (Biodiversity and Geodiversity), IIA11 (Historic Environment), IIA12 (Landscape and Townscape) and IIA13 (Water and Soil). This alternative seeks to go beyond the level of development identified in the proposed strategy and provide more employment, retail and cultural / leisure floorspace. As a result, development may encroach on the Borough's Metropolitan Open Land, Green Belt and other open space. This is likely to negatively impact efforts to conserve and enhance biodiversity and the historic environment, as well as protection of landscape/townscape character and natural resources.

### 3.2 Performance of High Quality Growth Policies

The High Quality Growth chapter includes twelve preferred policies, as shown in the summary table below. Three alternatives to the preferred policies have also been assessed.

**Table 3.3: Summary of High Quality Growth Policies Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 01: High Quality Growth	++	0	0	+	0	+	0	0	?	0	+	++	0	0
GR1 Delivering High Quality Design	0	0	+	+	0	?	++	?	?	+	+	+	?	?
GR2 Inclusive Neighbourhoods	+	0	+	+	0	+	0	0	0	0	+	0	0	0

Table 3.3: Summary of High Quality Growth Policies Assessments

GR3 Public Realm and Connecting Places	0	0	+	+	0	+	+	+	+	0	+	+	0	0
GR4 Building Heights	+	0	0	+	+	0	0	0	0	0	+	++	0	0
GR5 View Management	0	0	+	0	0	0	0	0	0	0	0	++	0	0
GR6 Areas of Special Character	0	0	0	+	0	0	+	0	0	+	+	+	0	0
<i>GR6 Areas of Special Character: Alternative 1</i>	0	0	0	?	0	0	0	0	0	-	-	-	0	0
GR7 External Lighting	0	0	0	+	0	0	+	0	0	+	0	+	0	0
GR8 Shopfronts and Forecourts	+	0	+	+	0	0	0	0	0	0	+	+	0	0
GR9 Outdoor Advertisement, Digital Display and Hoardings	0	0	+	+	0	0	++	0	0	0	+	+	0	0
GR10 Infill and Backland Sites, Back Gardens and Amenity Areas	0	0	+	+	+	+	0	0	0	+	0	+	0	+
<i>GR10 Infill and Backland Sites, Back Gardens</i>	0	0	0	-	-	0	0	0	0	0	0	-	0	0

**Table 3.3: Summary of High Quality Growth Policies Assessments**

<i>and Amenity Areas: Alternative 1</i>														
<i>GR10 Infill and Backland Sites, Back Gardens and Amenity Areas: Alternative 2</i>	0	0	?	+	?	?	0	0	0	+	0	?	0	+
GR11 Planning Obligations	0	+	+	+	+	+	0	0	0	+	0	+	0	0

All of the policies within this chapter of the Local Plan have generally performed well, with potential significant positive effects being identified in relation to IIA1 (Economy) for Strategic Policy 01: High Quality Growth, IIA7 (Air, Light and Noise Pollution) for Policy GR1 Delivering High Quality Design and Policy GR9 Outdoor Advertisement, Digital Display and Hoardings and IIA12 (Landscape and Townscape) for Strategic Policy 01: High Quality Growth, Policy GR4 Building Heights and Policy GR5 View Management.

A number of uncertain effects have been identified in relation to Strategic Policy 01 High Quality Growth, Policy GR1 Delivering High Quality Design, GR6 Alternative 1, and GR10 Alternative 2. Mitigation measures have been identified for these uncertain effects; these are listed in the detailed appraisal matrices.

### 3.3 Performance of Heritage Policies

The Heritage chapter includes three preferred policies, shown in the summary table below.

**Table 3.4: Summary of Heritage Policies Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 02: Harrow Heritage Assets	+	0	0	0	0	0	0	0	+	+	++	+	0	0
HE1 Heritage Assets	+	0	0	0	0	0	0	+	+	+	++	++	0	0
HE2 Enabling Development	+	0	0	0	+	0	0	0	0	0	0	0	0	0

All of the policies within this chapter of the Local Plan have generally performed well, with potential significant positive effects being identified in relation to IIA11 (Historic Environment) for Strategic Policy 02 Harrow Heritage Assets and Policy HE1 Heritage Assets and IIA12 (Landscape and Townscape) for Policy HE1 Heritage Assets.

### 3.4 Performance of Housing Policies

The Housing Policies includes thirteen preferred policies and thirty-one alternative policies. Due to the number of policies and alternatives for Chapter 4, the results are presented per policy below.

**Table 3.5: Summary of Strategic Policy 03 and Alternatives Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 03: Meeting Harrow's Housing Needs	+	0	+	0	++	+	-	0	0	0	0	+	+	0
<i>Strategic Policy 03: Meeting Harrow's Housing Needs: Alternative 1</i>	?	0	+	0	?	+	?	+	-	--	?	--	--	0
<i>Strategic Policy 03: Meeting Harrow's Housing Needs: Alternative 2</i>	0	0	+	0	-	+	0	0	0	0	0	0	0	0

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Strategic Policy 03 performs well, particularly with regards to the provision of housing (IIA5), for which a potential significant positive effect has been identified. The inclusion of reference to the scale of development sites could further enhance this policy. The potential effect for IIA13 (Water and Soil) could be enhanced with the explicit mention of avoiding greenfield land where possible for future development within the policy.

Conversely, Strategic Policy 03 Alternatives 1 and 2 do not perform as positively as the preferred policy, as Strategic Policy 03 Alternative 2 may not meet the identified need and Strategic Policy 03 Alternative 1 could be undeliverable due to the greater levels of development required.

**Table 3.6: Summary of Policy HO1 and Alternatives Assessment**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
HO1 Dwelling Size Mix	0	0	+	+	++	+	0	0	0	0	+	+	0	0
<i>HO1 Dwelling Size Mix: Alternative 1</i>	0	0	+	+	--	+	0	0	0	0	+	+	0	0
<i>HO1 Dwelling Size Mix: Alternative 2</i>	0	0	+	+	-	+	0	0	0	0	+	+	0	0
<i>HO1 Dwelling Size Mix: Alternative 3</i>	0	0	+	+	?	+	0	0	0	0	+	+	0	0
<i>HO1 Dwelling Size Mix: Alternative 4</i>	0	0	+	+	?	+	0	0	0	0	+	+	0	0

Policy HO1 Dwelling Mix is a generally positively performing policy which will help to ensure a mix of dwellings sizes are created to meet the needs of Harrow's residents. Therefore, a potential significant positive effect has been identified for IIA5 (Housing). There is potential to enhance the minor positive effects identified for IIA3 (Accessibility) and IIA4 (Health) through the inclusion of wording in criterion B (Flatted Developments) to the effect of ensuring houses on lower floors are prioritised for all residents with mobility difficulties.

The alternatives to this policy perform similarly, except for the housing objective (IIA5) due to the nuances between them. Whilst an uncertain effect has been recorded for HO1 Alternatives 3 and 4, and a potential significant negative for Alternative 1, a minor negative effect has been identified for HO1 Alternative 2.

**Table 3.7: Summary of Policy HO2 and Alternatives Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
HO2 Conversion and Redevelopment of Larger Dwellings	0	0	+	+	++	+	+	0	0	0	+	+	+	+
<i>HO2 Conversion and Redevelopment of Larger Dwellings: Alternative 1</i>	0	0	0	+	?	0	+	0	0	0	0	0	+	+
<i>HO2 Conversion and Redevelopment</i>	0	0	+	?	?	+	+	0	0	0	+	?	+	+



Table 3.7: Summary of Policy HO2 and Alternatives Assessments

<i>of Larger Dwellings: Alternative 2</i>														
<i>HO2 Conversion and Redevelopment of Larger Dwellings: Alternative 3</i>	0	0	+	-	?	+	+	0	0	0	+	+	+	+
<i>HO2 Conversion and Redevelopment of Larger Dwellings: Alternative 4</i>	0	0	-	+	++	-	+	?	0	0	+	+	+	+
<i>HO2 Conversion and Redevelopment of Larger Dwellings: Alternative 5</i>	0	0	+	+	--	+	+	0	0	0	--	--	+	-
<i>HO2 Conversion and Redevelopment of Larger Dwellings: Alternative 6</i>	0	0	?	?	++	?	+	0	0	0	+	+	+	+

Policy HO2 Conversion and Redevelopment of larger dwellings seeks to control the redevelopment of larger dwellings into small flats and ensure family sized homes are retained and when conversions are permitted there is no net loss in family housing, therefore a potential significant positive effect has been identified for IIA5 (Housing). The minor positive effect identified for IIA4 (Health) could be enhanced through wording

within criterion 3e which requires development to achieve excellent environment in relation to privacy, daylight, sunlight, outlook and exposure to external noise.

HO2 Alternatives 1-5 do not perform as positively as the preferred policy option. There is potential for HO2 Alternative 6 to result in potentially positive effects, as this would target redevelopment in appropriate locations and protect family sized dwellings in areas which need them most. However, further investigation is needed in order to understand the precise locations for the application of HO2 Alternative 6.

**Table 3.8: Summary of Policy HO3 Assessment**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Policy HO3 Optimising the Use of Small Housing Sites	0	0	+	+	+	+	0	0	0	+	0	+	0	0

Policy HO3 Optimising the use of small housing sites performs positively across all IIA objectives, with no significant positive or negative effects identified. A potential enhancement measure has been identified in relation to IIA10 (Biodiversity and Geodiversity; the expansion of criterion 3e to consider connections with adjoining sites or expansion of existing GI on those sites, which could help to increase the network of habitats within the Borough.

Table 3.9: Summary of Policy HO4 and Alternatives Assessments

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Policy HO4 Genuinely Affordable Housing	0	+	0	0	++	0	0	0	0	0	0	0	+	0
<i>Policy HO4 Genuinely Affordable Housing: Alternative 1</i>	0	+	0	0	-	0	0	0	0	0	0	0	+	0

Policy HO4 Genuinely Affordable Housing aims to increase the affordable housing available within the Borough, therefore there is potential for a significant positive effect to occur in relation to IIA5 (Housing). There is some uncertainty regarding total provision of affordable housing as Policy HO4 contains some criteria which allow for affordable housing not to be provided when this is unviable. However, in such a case, market housing would be provided which will still support housing provision across the Borough and therefore an overall potential significant effect is identified. It is noted that the alternative to the proposed policy does not perform as favourably, as this option puts a greater emphasis on intermediate products rather than low-cost rental affordable housing for which there is a greater need in Harrow.

**Table 3.10: Summary of Policy HO5 and Alternatives Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Policy HO5 Housing Estate Renewal and Regeneration	0	0	-	++	?	++	0	+	0	-	0	+	+	0
<i>Policy HO5 Housing Estate Renewal and Regeneration: Alternative 1</i>	0	0	?	++	?	0	0	0	0	0	0	0	0	0
<i>Policy HO5 Housing Estate Renewal and Regeneration: Alternative 2</i>	0	0	++	++	?	++	0	+	0	+	0	+	+	0

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Policy HO5 Housing Estate Renewal and Regeneration sets out the criteria for regeneration of estates within the Borough. The proposed policy has potential for a significant positive effect on IIA6 (Sustainable Travel) due to the need for good active and public transport links and IIA4 (Health) through providing a healthy living environment and better quality housing. However, a potential minor negative effect has been identified in relation to IIA3 (Accessibility) as the proposed policy allows for the loss of some external amenity space. Such loss is allowed, however, in order to ensure that redevelopments can work in practice. It is recommended that the policy should make it clearer that quality improvements would be sought to remaining amenity space.

An uncertain effect has been identified for IIA5 (Housing) this because further clarity is needed regarding the rights of returning residents and potential net affordable dwelling loss. Several potential effects could also be enhanced – IIA6 (Sustainable Travel), IIA8 (Climate Change Adaption) and IIA10 (Biodiversity and Geodiversity). Measures include the addition of public transport access within estates, the inclusion of low carbon and energy efficient design within dwellings and a new criterion requiring the maintenance of existing (and creation of new) biodiversity and green infrastructure, particularly where this connects to neighbouring sites.

HO5 Alternative 1 is not to have a specific policy on housing estate renewal and regeneration, which does not perform as favourably. HO5 Alternative 2 requires the re-provision of external amenity space and this is the primary reason why it performs more favourably than the proposed policy. However, it could result in a lower level of provision of affordable housing, hence an uncertain effect is identified for IIA5 (Housing).

**Table 3.11: Summary of Policy HO6 and Alternatives Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Policy HO6 Accommodation for Older People	0	0	+	+	++	+	0	+	0	0	0	0	0	0
<i>Policy HO6 Accommodation for Older People: Alternative 1</i>	0	0	+	+	+	+	0	0	0	0	0	0	+	0
<i>Policy HO6 Accommodation for Older People: Alternative 2</i>	0	0	?	?	++	?	0	?	0	0	0	0	0	0
<i>Policy HO6 Accommodation</i>	0	0	+	+	?	+	0	+	0	0	0	0	0	0

**Table 3.11: Summary of Policy HO6 and Alternatives Assessments**

*for Older People:  
Alternative 3*

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Policy HO6 Accommodation for Older People has performed positively. A potential significant positive effect has been identified for IIA5 (Housing) as accommodation for older people will be created within the Borough – a key issue for the lifetime of the Local Plan. The inclusion of wording within this policy to maintaining existing (or the creation of new) links to public transport could help to further the positive effect identified. None of the three alternative policy options perform as positively as the proposed policy.

**Table 3.12: Summary of HO7 and Alternative Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Policy HO7 Supported and Sheltered Housing	0	0	++	+	+	+	0	0	0	0	0	0	+	+
<i>Policy HO7: Supported and Sheltered Housing: Alternative 1</i>	0	0	+	+	+	+	0	0	0	0	0	0	+	0

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Policy HO7 Supported and Sheltered Housing makes provision for supported and sheltered housing across the Borough, including provision for the adaptation of existing dwellings. A potential significant positive effect has been identified in relation to IIA3 (Accessibility), as it makes provision for accessible housing of the right size and type for the intended user, such as by adapting homes for those with specific needs. This policy has also performed positively against several other objectives, although it is noted that there is potential for enhancement of the positive effects for IIA4 (Health) and IIA5 (Housing) with the inclusion of a criterion which requires developers to consult with the council and local charities, as well as protected groups for whom the housing is intended, on the design of future sheltered and supported housing. Policy HO7 Alternative 1 performs similarly.

**Table 3.13: Summary of Policy HO8 and Alternatives Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Policy HO8 Purpose Built Student Accommodation	+	0	+	-	?	+	0	0	0	0	0	0	0	0
<i>Policy HO8 Purpose Built Student Accommodation: Alternative 1</i>	0	0	-	-	?	-	0	0	0	0	0	0	0	0
<i>Policy HO8 Purpose Built Student Accommodation: Alternative 2</i>	+	0	+	-	?	+	-	0	0	0	0	0	0	0

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Policy HO8 Purpose Built Student Accommodation sets out requirements for purpose-built student accommodation (PBSA). The performance of this policy and the alternatives are mixed, as there is a lack of clarity surrounding the need for PBSA within Harrow. Further discussion with the planning officers into this need is required to mitigate the uncertain effects identified in relation to IIA5 (Housing). Potential minor negative effects have been identified for IIA4 (Housing) and IIA14 (Waste) for the preferred policy and both alternative policies. The policies do not provide for access to open space or green infrastructure, which could inhibit wellbeing as not all students will be able to afford paid-for recreation facilities to maintain physical and mental health.

Two reasonable alternatives to Policy HO8 Purpose Built Student Accommodation have been identified and assessed. HO8 Alternative 1 performs more negatively than the preferred policy, with potential minor negative effects being identified in relation to IIA3 (Accessibility), IIA4 (Health and Wellbeing), and IIA6 (Sustainable Travel). HO8 Alternative 2 performs only slightly more negatively, with a potential minor negative effect being identified in relation to IIA7 (Air, Light and Noise Pollution).

**Table 3.14: Summary of Policy HO9 and Alternatives Assessment**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
HO9 Large Scale Purpose Built Shared Living	+	+	+	+	?	+	0	0	0	0	0	+	0	+
<i>HO9 Large Scale Purpose Built Shared Living: Alternative 1</i>	-	-	0	-	-	-	0	0	0	0	0	-	0	-



Table 3.14: Summary of Policy HO9 and Alternatives Assessment

<i>HO9 Large Scale Purpose Built Shared Living: Alternative 2</i>	+	+	+	+	?	+	0	0	0	0	0	0	+	0	+
<i>HO9 Large Scale Purpose Built Shared Living: Alternative 3</i>	+	+	+	+	?	+	0	0	0	0	0	0	-	0	+
<i>HO9 Large Scale Purpose Built Shared Living: Alternative 4</i>	+	+	?	+	?	+	0	0	0	0	0	0	-	0	+

Policy HO9 Large Scale Purpose Built Shared Living outlines how large-scale purpose-built shared living (LSPBSL) will be considered in development proposals. The preferred policy and HO9 Alternative 2 both perform well relative to the other alternatives, with the least amount of negative or uncertain effects being identified.

A number of uncertain effects were identified across the policies and alternatives for IIA3 (Accessibility) for HO9 Alternative 4, and IIA5 (Housing) for the preferred policy and HO9 Alternatives 2, 3 and 4. HO9 Alternative 1 which is for no policy option to be implemented, performs the worst with a number of potential minor negative effects being identified.

**Table 3.15: Summary of Policy HO10 and Alternatives Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
HO10 Housing with shared facilities (Houses in Multiple Occupation)	0	0	+	+	+	+	0	0	+	+	0	+	0	+
<i>HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 1</i>	0	0	+	0	-	+	0	0	+	+	0	+	0	-
<i>HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 2</i>	0	0	+	+	-	+	0	0	+	+	0	-	0	+
<i>HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 3</i>	0	0	+	+	-	+	0	0	+	+	0	-	0	+

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**Table 3.15: Summary of Policy HO10 and Alternatives Assessments**

<i>HO10 Housing with shared facilities (Houses in Multiple Occupation): Alternative 4</i>	0	0	-	+	-	+	0	0	+	+	0	-	0	+
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Policy HO10 Housing with shared facilities (Houses in Multiple Occupation) sets out how Houses of Multiple Occupancy (HMOs) will be considered in development proposals. The preferred policy performs the most positively out of all of the policies/alternatives suggested for HO10, with no potential negative or uncertain effects being identified.

**Table 3.16: Summary of Policy HO11 Assessment**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
HO11 Self-build and Custom-build Housing	0	0	+	0	+	0	0	0	0	0	0	0	0	0

Policy HO11\_Self-build and Custom-build Housing outlines how self- and custom-Build development proposals are considered for development across the Borough. The policy generally performs well, with a mixture of neutral and potential minor positive effects being identified.

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**Table 3.17: Summary of Policy HO12 and Alternatives Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
HO12 Gypsy and Traveller Accommodation Needs	0	0	+	+	+	+	0	0	+	?	0	+	?	+
<i>HO12 Gypsy and Traveller Accommodation Needs: Alternative 1</i>	0	0	--	--	--	?	0	0	--	?	0	-	0	0
<i>HO12 Gypsy and Traveller Accommodation Needs: Alternative 2</i>	0	0	--	--	--	+	0	0	+	?	0	+	?	+

006

Policy HO12 Gypsy and Traveller Accommodation Needs outlines how Gypsy and Traveller Accommodation needs are considered across the Borough. In the preferred policy, the Council aims to retain the existing site at Watling Farm but will support proposals for new sites and pitches providing that there is an identified need. The preferred policy generally performs well, with only two uncertain effects being identified for IIA10 (Biodiversity and Geodiversity) and IIA13 (Water and Soils). Although the preferred policy does not encourage development on Green Belt/Metropolitan Open Land or Sites of Importance for Nature Conservation, uncertain effects have been identified in relation to IIA10 and IIA13 as development on these areas is allowed in exceptional circumstances under the National Planning Policy Framework (NPPF). The precise nature of potential effects for IIA10 and IIA13 cannot be determined without details of the design and location of sites this policy could apply to.

The alternatives to Policy HO12 perform poorly in comparison to the preferred policy, with potential significant negative effects being identified for IIA3 (Accessibility), IIA4 (Health and Wellbeing) and IIA5 (Housing) for both alternatives. The assessment of HO12 Alternative 1 also identified a potential significant negative effect for IIA9 (Climate Change Mitigation). A number of uncertain effects were also identified for IIA6 (Sustainable Transport), IIA10 (Biodiversity and Geodiversity), and IIA13 (Water and Soil).

### 3.5 Performance of Local Economy Policies

The Local Economy chapter includes seven preferred policies, as shown in the summary table below. Three alternatives to the preferred policies have also been assessed.

**Table 3.18: Summary of Local Economy Policies Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 04: Local Economy	++	++	0	0	0	0	0	0	0	0	0	0	0	0
Strategic Policy 05: Harrow & Wealdstone Opportunity Area	++	+	+	+	+	++	0	+	+	+	+	+	0	0
LE1 Development Principles and	++	+	+	+	0	+	+	0	0	0	0	+	0	+

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Table 3.18: Summary of Local Economy Policies Assessments														
Town Centre Hierarchy														
<i>LE1 Development Principles and Town Centre Hierarchy: Alternative 1</i>	+	+	+	+	0	+	+	0	0	0	0	+	0	+
LE2 Night-time and Evening Economy	++	+	0	0	0	0	+	0	0	0	0	0	0	0
LE3 Industrial Land	+	+	0	0	0	+	0	+	0	0	0	0	0	+
<i>LE3 Industrial Land: Alternative 1</i>	+	+	0	0	0	+	0	+	0	0	0	0	0	+
<i>LE3 Industrial Land: Alternative 2</i>	?	+	0	0	+	+	0	+	0	0	0	0	0	+
LE 4 Culture and Creative Industries	+	+	0	+	0	0	+	0	0	0	+	+	0	0
LE5 Tourism and Visitor Accommodation	++	+	+	+	0	+	+	0	0	0	+	+	0	+

All of the policies within this chapter of the Local Plan have generally performed well, with potential significant positive effects being identified in relation to IIA1 (Economy) for five of the policies. Potential significant positive effects have also been identified in relation to IIA2 (Employment) for Strategic Policy 04: Local Economy and IIA6 (Sustainable Travel) for Strategic Policy 05: Harrow & Wealdstone Opportunity Area.

The reasonable alternative to Policy LE1 Development Principles and Town Centre Hierarchy performs similarly to the preferred policy, however a potential minor positive effect for IIA1 (Economy) is identified instead of a potential significant positive effect, as a less restrictive alternative would not control or protect main centre uses, which may impact on the vitality and vibrancy of town centres.

Two reasonable alternatives to policy LE3 Industrial Land have been identified and assessed. LE3 Alternative 1 performs the same as the preferred policy. One uncertain effect was identified in relation to IIA1 (Economy) for LE3 Alternative 2. This alternative policy allows for the co-location of housing on Local Strategic Industrial Sites. It is uncertain what impact this may have on the economy as it is dependent on where the housing is located, the magnitude of impact this may have on industrial floorspace, and the types of industry impacted.

### 3.6 Performance of Community Infrastructure Policies

The Community Infrastructure chapter includes five preferred policies, as shown in the summary table below.

Table 3.19: Summary of Community Infrastructure Policies Assessments														
Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 06: Social and Community Infrastructure	+	+	+	+	0	0	0	0	+	+	0	0	0	0
C11 Safeguarding and Securing Social Infrastructure	+	+	+	++	0	+	+	0	0	0	0	0	0	+
C12 Play and Informal Recreation	0	0	+	++	0	0	0	0	+	+	0	0	0	0

**Table 3.19: Summary of Community Infrastructure Policies Assessments**

CI3 Sport and Recreation	+	+	+	++	0	+	+	0	0	+	+	+	+	0
CI4 Digital and Communications Infrastructure	+	+	+	0	0	0	0	0	0	+	+	+	0	0

All of the policies within this chapter of the Local Plan have generally performed well, with potential significant positive effects being identified in relation to the health IIA objective for three of the policies relating to social infrastructure, play and informal recreation and sports and recreation.

### 3.7 Performance of Green Infrastructure Policies

The Green Infrastructure chapter includes six preferred policies, as shown in the summary table below. Two alternatives to the preferred policies have also been assessed.

**Table 3.20: Summary of Green Infrastructure Policies Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 07: Green Infrastructure	0	0	0	+	0	0	+	0	+	+	0	+	+	0



Table 3.20: Summary of Green Infrastructure Policies Assessments

GI1 Green Belt and Metropolitan Open Land	0	0	0	+	0	0	0	0	0	+	+	+	+	0
GI2 Open Space	0	0	+	+	0	0	0	0	+	?	0	0	0	0
<i>GI2 Open Space: Alternative 1</i>	0	0	0	+	0	0	0	0	+	+	0	0	0	0
GI3 Biodiversity	0	0	0	+	0	0	0	0	+	++	+	0	+	0
<i>GI3 Biodiversity: Alternative 1</i>	0	0	0	+	0	0	0	0	+	++	+	0	+	0
GI4 Urban Greening, Landscaping and Trees	0	0	0	0	0	0	+	0	+	++	+	+	+	0
GI5 Food Growing	0	0	0	+	0	0	0	0	+	+	0	0	+	0

The policies within the Green Infrastructure chapter generally perform well against the IIA objectives, with potential significant positive effects being identified in relation to IIA10 (Biodiversity and Geodiversity).

An uncertain effect has also been identified for GI2 Open Space, for IIA10 (Biodiversity and Geodiversity). This is because the requirements of the policy enhance biodiversity and natural capital, as well as access to biodiversity, whilst ensuring that there is no loss of access to natural greenspace from development. However, as the policy allows for the development of community infrastructure in exceptional circumstances, this could also cause harm to existing biodiversity. In order to mitigate for this uncertain effect, the policy should state that in circumstances where the development of community infrastructure is allowed for on Open Space, there must be no loss/harm to biodiversity, and that the development must meet the Biodiversity Net Gain of 20% as set out in Policy GI3.

Policy G12 Open Space performs well and could result in a number of minor positive effects. The reasonable alternative to Policy G12 performs slightly better than the preferred policy, as the preferred policy identified uncertainty in relation to IIA10 (Biodiversity and Geodiversity). This outcome is due to the alternative policy being more restrictive than the preferred policy; this restriction removes the uncertainty identified in the preferred policy relating to potential harm to existing biodiversity as a result of the development of community infrastructure in exceptional circumstances. However, the preferred policy G12 performs more positively with regards to community infrastructure provision.

Policy G13 Biodiversity performs well and could result in a significant positive effect for IIA10 (Biodiversity and Geodiversity). The reasonable alternative to policy G13 has been identified and assessed. G13 Alternative 1 performs the same as the preferred policy. The assessment notes that although both requirements will result in a significant positive result for IIA10 (Biodiversity and Geodiversity), G13 Alternative 1 is unlikely to benefit biodiversity to the same extent as the preferred option policy due to the requirement of a smaller biodiversity net gain for developments.

### 3.8 Performance of Climate and Nature Policies

The Climate and Nature chapter includes six preferred policies, as shown in the summary table below. Two alternatives to the preferred policies have also been assessed.

**Table 3.21: Summary of Climate and Nature Policies Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 08: Responding to the Climate and Nature Emergency	0	+	0	+	?	++	+	++	+	+	0	0	+	+

Table 3.21: Summary of Climate and Nature Policies Assessments															
CN1 Sustainable Design and Retrofitting	+	+	0	+	0	0	0	0	++	+	+	+	+	0	0
<i>CN1 Sustainable Design and Retrofitting: Alternative 1</i>	+	+	0	+	?	0	0	0	+	+	+	+	+	0	0
<i>CN1 Sustainable Design and Retrofitting: Alternative 2</i>	+	+	0	+	0	0	0	0	+	+	+	+	+	0	0
CN2 Energy Infrastructure	0	+	0	0	0	+	+	++	0	+	0	+	0	0	0
CN3 Reducing Flood Risk	+	0	0	+	0	0	0	0	++	+	0	0	0	+	0
CN4 Sustainable Drainage	+	0	0	+	0	0	0	0	++	+	0	0	0	++	0
CN5 Waterway Management	0	+	0	0	0	0	0	0	0	+	+	0	0	+	0

The policies within the Climate and Nature chapter generally perform well against the IIA objectives, with potential significant positive effects being identified in relation to IIA6 (Sustainable Travel), IIA8 (Climate Change Adaptation), IIA9 (Climate Change Mitigation) and (IIA13 Soil and Water).

An uncertain effect is identified for Strategic Policy 08 Responding to the Climate and Nature Emergency and CN1 Alternative 1 in relation to IIA5 which relates to housing. This is because the requirements of the policy might lead to increased developer costs and therefore affect delivery. To mitigate the uncertain effect, a viability assessment should be undertaken to ensure that the policy is deliverable.

Policy CN1 Sustainable Design and Retrofitting performs well and could result in a potential significant positive effect in relation to IIA8 (Climate Change Adaptation). Two reasonable alternatives to Policy CN1 have been identified and assessed. CN1 Alternative 1 would just focus on major applications / development proposals, (i.e. 10+ units) or the small site threshold (sites less than 0.25 ha in size). The assessment of CN1 Alternative 1 identified uncertainty in relation to IIA5 which relates to housing. The alternative may result in smaller site developments but there is uncertainty over how many smaller site development proposal may come forward within the Borough, hence the uncertain effect is identified. CN1 Alternative 2 requires all developments to achieve Net Zero Carbon according to the Building Regulations framework, i.e. a 100% improvement over Part L 2021 and offset their residual emissions. CN1 Alternative 2 uses a different definition to the preferred policy approach and is therefore less stringent. It therefore performs less well with regards IIA8 (Climate Change Adaptation). Neither CN1 alternative performs as well as the preferred policy.

### 3.9 Performance of Waste and Circular Economy Policies

The Waste and Circular Economy chapter includes three preferred policies, as shown in the summary table below.

**Table 3.22: Summary of Waste and Circular Economy Policies Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 09: Managing Waste and Supporting the Circular Economy	0	0	0	0	0	0	0	0	0	0	0	+	0	++
CE1 Reducing and Managing Waste	0	0	0	0	0	0	+	0	0	0	0	0	0	++
CE2 Design to Support the Circular Economy	0	0	0	0	0	0	0	0	0	0	0	0	0	++

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The policies within the waste chapter generally perform fairly well against the IIA objectives, although most potential effects are identified as neutral. This is largely because the policies are not considered to be relevant to many of the IIA objectives. As would be expected, all three of the policies should result in potential significant positive effects with regards to IIA14 (Waste).

### 3.10 Performance of Movement Policies

The Movement chapter includes four preferred policies, as shown in the summary table below.

**Table 3.23: Summary of Movement Policies Assessments**

Policy	IIA Objective													
	Economy	Employment	Accessibility and Inequalities	Health	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Adaptation	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape and Townscape	Water and Soil	Waste
	IIA1	IIA2	IIA3	IIA4	IIA5	IIA6	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
Strategic Policy 10: Movement	+	0	+	+	0	++	+	+	0	0	0	0	0	0
M1 Sustainable Transport	0	0	+	+	0	++	+	+	0	0	0	0	0	0
M2 Parking	0	0	+	+	0	++	+	+	+	0	0	+	0	0
M3 Deliveries, Servicing	0	0	0	+	0	+	+	+	0	0	0	0	0	0

**Table 3.23: Summary of Movement Policies Assessments**

and Construction														
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All of the policies within this chapter of the Local Plan generally perform well, although many potential effects are identified as neutral. This is largely because the policies are not considered to be relevant to many of the IIA objectives. Potential significant positive effects have been identified in relation to IIA6 (Sustainable Travel) resulting from Strategic Policy 10: Movement, Policy M1 Sustainable Transport and Policy M2 Parking.

## **4.0 Habitats Regulations Assessment**

At this early stage in the IIA, Habitats Regulations Assessment (HRA) is integrated within the wider integrated assessment. The scope of the HRA was included within the IIA Scoping Report (Appendix B)(i.e. the Habitats Sites which will be considered in the HRA). The preferred policies within the draft Local Plan will be screened to identify whether the preferred policies could result in Likely Significant Effects (LSE) on the integrity of any of the Habitat Sites, in terms of its conservation objectives and qualifying interests.

The HRA process requires close working with Natural England in order to agree the process and outcomes and, if necessary, obtain information and agree mitigation proposals.

Each preferred policy will be screened to identify LSEs which could arise resulting from the policies in isolation and/or in combination with other plans or projects. The screening process is currently ongoing and will be discussed with officers over the coming weeks.

Details on the results of HRA screening will be presented in the IIA Report and in a separate HRA Screening Statement. Natural England will be consulted on the findings of the screening exercise presented within the IIA Report.

## **5.0 Next Steps**

Detailed assessment matrices in an Excel format will be provided to officers for their comment after which amendments may be made to the assessments by SLR. Once agreed, the assessment findings will be presented within an IIA Report which will accompany the Regulation 18 draft Local Plan when it is consulted on.

Natural England will specifically be consulted on the findings of the HRA Screening.



**Appendix A      Agreed IIA Framework (for reference only, not for amendment)**

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Proposed IIA Objective	Assessment Question. Does the policy or option...?
<p><b>IIA1 Economy:</b>  <b>To deliver economic growth and support the creation of new businesses, whilst supporting the growth and retention of existing businesses</b></p>	<ul style="list-style-type: none"> <li>• support existing and new businesses within the borough by encouraging innovation, diversification and good quality economic development?</li> <li>• support the provision of world class infrastructure and connectivity?</li> <li>• support flexible working practices?</li> <li>• protect and retain an adequate supply of employment floor space to address business needs?</li> <li>• enhance the vitality and viability of town centres, by retaining and providing additional floor space for town centre use?</li> <li>• safeguard existing town centres?</li> <li>• maintain a range of uses in town centres including retail, community infrastructure, culture, residential and employment?</li> <li>• improve existing shopping facilities within town centres and neighbourhood parades?</li> <li>• support the redevelopment / intensification of existing employment land to provide additional and high quality employment floor space?</li> <li>• support the economic regeneration of areas such as the Harrow and Wealdstone Opportunity Area?</li> </ul>
<p><b>IIA2 Employment:</b>  <b>To create greater employment opportunities and higher value jobs for all ages across the whole borough</b></p>	<ul style="list-style-type: none"> <li>• create new jobs in high value sectors, including in the green sector?</li> <li>• encourage developers to demonstrate how they are investing in skills and employing local people?</li> </ul>
<p><b>IIA3 Accessibility:</b></p>	<ul style="list-style-type: none"> <li>• ensure all residents have equitable access to local services and facilities, taking into account the needs of an aging population, including:</li> </ul>

Proposed IIA Objective	Assessment Question. Does the policy or option...?
<p><b>To improve local accessibility to healthcare, education, retail facilities, general community facilities and recreational resources (including open spaces and sports facilities)</b></p>	<ul style="list-style-type: none"> <li>○ education facilities?</li> <li>○ recreation facilities?</li> <li>○ health services?</li> <li>● increase the delivery of new or enhanced community and health facilities?</li> <li>● help ensure all children have access to a local school within reasonable walking distance?</li> <li>● increase education facility provision for children with learning disabilities?</li> <li>● ensure local facilities have capacity to accommodate proposed development?</li> <li>● ensure all residents have equitable access to education, community services and facilities irrespective of race, religion, sex, age, sexual orientation, disability, gender reassignment, marriage and civil partnership or pregnancy/maternity?</li> <li>● avoid an adverse/ discriminatory impact on protected characteristics/equality groups?</li> <li>● ensure development is built to accessible and inclusive design standards to address the needs of a range of users, including those who are disabled, elderly, families with children?</li> </ul>
<p><b>IIA4 Health and Wellbeing:</b> <b>Enable residents to lead a healthy, good quality life</b></p>	<ul style="list-style-type: none"> <li>● use design to create safe and attractive neighbourhoods, suitable for all members of the community, which contribute towards quality of life and community cohesion?</li> <li>● ensure everyone has access to places to mix and meet such as community facilities (e.g.: community halls and places of worship) and recreation facilities?</li> <li>● increase and improve opportunities for active travel including walking and cycling?</li> <li>● increase and improve provision of informal and formal recreation (e.g.: swimming pool, sports centre) facilities?</li> <li>● ensure everyone has access to open space to help promote healthy lifestyles and wellbeing?</li> <li>● increase provision of private amenity space?</li> <li>● encourage the protection of allotments and encourage the delivery of new spaces to grow food?</li> <li>● ensure all representative groups will be consulted and engaged with?</li> </ul>
<p><b>IIA5 Housing:</b></p>	<ul style="list-style-type: none"> <li>● increase the number of additional homes delivered to meet local needs/targets?</li> </ul>

<b>Proposed IIA Objective</b>	<b>Assessment Question. Does the policy or option...?</b>
<b>To deliver a range of housing sites and ensure everyone has access to housing, which is affordable, and meets the needs of all residents including the elderly, families with children and other vulnerable groups</b>	<ul style="list-style-type: none"> <li>• increase the delivery of the right size of housing to address local needs, particularly family sized housing (three bed or more)?</li> <li>• provide affordable homes of the tenure and size to meet the identified needs?</li> <li>• increase the delivery number of and range of suitable accommodation to address the needs of older people (including those who require support or care)?</li> <li>• increase the delivery of homes built to accessible and adaptable standards (e.g. Part M of building regulations 2010) to address the needs of a range of users/occupants; such as those with disabilities, wheel chair users and families with children?</li> <li>• provide a range of different sized housing sites in order to maintain a stable supply and five-year land supply of deliverable sites?</li> </ul>
<b>IIA6 Sustainable Travel: To reduce the need to travel and promote sustainable travel habits including walking, cycling and public transport usage.</b>	<ul style="list-style-type: none"> <li>• ensure new development is located within an accessible distance to facilities, services and jobs via the use of sustainable modes of transport?</li> <li>• encourage intensification in existing residential areas in the most accessible locations within the borough?</li> <li>• improve existing cycling and walking network and provide new routes?</li> <li>• increase and improve opportunities to access public transport including where there are existing issues (such as steps)?</li> <li>• reduce congestion on the strategic and local road network through the delivery of new or enhanced transport and communications infrastructure?</li> </ul>
<b>IIA7 Air, Light and Noise Pollution: To minimise air, light and noise pollution and ensure that future growth does not lead to the further deterioration of environmental conditions</b>	<ul style="list-style-type: none"> <li>• ensure new and existing communities are not adversely affected by poor air quality and noise pollution including from increasing vehicular movement and commercial activities, either through their location or through causing a further deterioration as a result of new development?</li> <li>• avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security?</li> </ul>

Proposed IIA Objective	Assessment Question. Does the policy or option...?
<p><b>IIA8 Minimising Contributions to Climate Change:</b> To reduce the borough's contribution towards the emission of climate change gases</p>	<ul style="list-style-type: none"> <li>• support the delivery of renewable and low carbon energy capacity (including small scale, community energy projects and district heat networks) in line with the London Plan (2021)?</li> <li>• support the shift towards usage of electric and ultralow emissions vehicles?</li> <li>• promote a low carbon local economy?</li> <li>• ensure new developments are energy efficient?</li> <li>• minimise greenhouse gas emissions?</li> </ul>
<p><b>IIA9 Adaptation to Climate Change:</b> Adapt to the effects of climate change including flood risk, extreme weather and reduced water availability</p>	<ul style="list-style-type: none"> <li>• minimise flood risk and ensure new development contributes to the provision of sustainable urban drainage?</li> <li>• ensure new development is designed to withstand future climate change e.g. overheating and increased storm severity?</li> <li>• encourage the development of new green infrastructure which creates a connected network of green and blue infrastructure across the borough and within the wider area?</li> </ul>
<p><b>IIA10 Biodiversity:</b> To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.</p>	<ul style="list-style-type: none"> <li>• avoid adverse effects on European designated habitats sites?</li> <li>• conserve, enhance and repair nationally and locally designated wildlife sites?</li> <li>• conserve, enhance and repair natural and semi natural habitats?</li> <li>• contribute to the delivery of new or safeguard existing BAP priority species and habitats?</li> <li>• achieve biodiversity net gain (BNG) in new developments?</li> <li>• provide new or improved access to greenspaces?</li> <li>• contribute to creating a network of new wildlife habitats, (considering all public, private and shared greenspaces within the borough)?</li> <li>• protect sites of geological importance?</li> </ul>
<p><b>IIA11 Historic Environment:</b> To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their</p>	<ul style="list-style-type: none"> <li>• Conserve and/or enhance heritage assets, cultural and archaeological assets and features, and their settings?</li> <li>• maintain and enhance access to cultural heritage assets?</li> <li>• ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context?</li> </ul>

<b>Proposed IIA Objective</b>	<b>Assessment Question. Does the policy or option...?</b>
<b>settings and where appropriate improve the quality of the built environment</b>	<ul style="list-style-type: none"> <li>• contribute to the better management of heritage assets and contribute to conserving heritage at risk?</li> <li>• improve the quality and condition of the historic environment?</li> <li>• encourage heritage-led regeneration?</li> <li>• help provide solutions to those assets on the Heritage at Risk register?</li> </ul>
<b>IIA12 Landscape and Townscape: To conserve and enhance the borough's landscape and townscape character</b>	<ul style="list-style-type: none"> <li>• respect, maintain and strengthen local landscape and townscape character and distinctiveness?</li> <li>• promote high quality and contextually successful design?</li> <li>• avoid development of Green Belt and Metropolitan Open Land which would have a negative visual impact?</li> <li>• protect sensitive areas and protected views?</li> <li>• safeguard landscape and townscape features such as trees?</li> </ul>
<b>IIA13 Soils and Water: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil and minerals resources</b>	<ul style="list-style-type: none"> <li>• seek to improve or remediate contaminated land or reuse previously developed land which has not been restored?</li> <li>• avoid development of greenfield land?</li> <li>• promote the efficient use of minerals?</li> <li>• protect soil quality and avoid soil pollution?</li> <li>• ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments?</li> <li>• protect groundwater and surface water, including water bodies, from pollution and contribute to improving the water quality of groundwater and water bodies?</li> <li>• Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?</li> </ul>
<b>IIA14 Waste: To minimise waste.</b>	<ul style="list-style-type: none"> <li>• encourage new developments to provide adequate space for waste separation?</li> <li>• encourage the repurposing and refurbishing of buildings, instead of demolition?</li> <li>• ensure waste is dealt with in line with circular economy principles?</li> <li>• safeguard existing waste management sites?</li> </ul>

## **Appendix B Local Plan Policies and Alternatives**

### **1.1 Introduction**

This appendix sets out the alternatives considered as part of the Integrated Impact Assessment (IIA) undertaken on the Harrow Local Plan, as part of Stage B – Options assessment in the IIA. Not all policies have an identified alternative/s. Where a policy has an identified alternative/s, the preferred policy is reproduced below (at the time of writing 18/01/24) and the alternative/s are provided below it. Since undergoing assessment, minor grammatical amendments to policies and alternative/s have been undertaken; the policy positions have not changed, however.

### **1.2 Chapter 01: Spatial Vision and Strategy and Strategic Objectives**

#### **Spatial Vision**

In the year 2041 Harrow will continue to be a thriving outer London Borough, helping London to grow sustainably while maintaining its own identity. There will be a resounding sense of pride in Harrow, it is a place that people want to live, work and visit.

Development will respect the character of the borough and its capacity to evolve over time.

The diverse Harrow community will benefit from an ever-improving quality of life, having a well-connected borough that provides excellent local access to a range of facilities, services, housing, employment, and nature.

Harrow will be a clean and safe borough where residents can settle in homes that suit the needs of their household and lifestyle.

Residents and businesses will benefit from the creation of sustainable neighbourhoods where housing, local services, employment, and facilities are within walking and cycling distance. Residents will be healthier and happier due to localised provision of goods and services.

Town centres will be revitalised through innovative measures adapting to their changing roles as places of leisure, arts and culture, in addition to work and retail hubs. Town centres will be exciting places for people to live should they choose.

The borough has been responding to the climate emergency and seeing the benefits of taking early action to improve our environment. New developments are energy efficient and carbon neutral. Retrofit of older building stock has been encouraged and facilitated to minimise emissions and ensure residents have cheap, clean energy.

Air quality will have significantly improved through shifts to sustainable transport and electric cars. Active transport and EV infrastructure has been bolstered to facilitate the transition. Recycling rates will be some of the best in London.

The borough will see increased rates of biodiversity through the protection and enhancement of existing green spaces, and the provision of additional spaces alongside development. The green belt and metropolitan open land will continue to be the lungs of the borough through enhancement projects.

**Spatial Strategy:** (note, quantum of development subject to ongoing evidence base work)

By 2041, new development and economic growth will provide 16,040 new low-carbon homes, create over X,XXX additional new jobs and fund significant local infrastructure improvements that benefit Harrow's diverse community.

The high-quality carbon neutral design of new development will contribute to local distinctiveness, creating clean, green and healthy spaces that foster community pride, whilst also delivering on the council's climate and nature objectives.

Comprehensive and coordinated regeneration activity will continue to positively transform the Harrow & Wealdstone Opportunity Area, delivering a minimum of 5,000 additional new homes, and 1,000 additional new jobs.

Harrow town centre will continue to be a vibrant and attractive Metropolitan Centre having benefited from additional arts, leisure, and culture facilities. Adaptable mixed-use and residential development will ensure that there is continued vibrancy in the centre. Employment uses will be bolstered attracting and retaining an array of adaptable businesses and workers to the area. The centre will be the primary location for central public services ensuring high-quality services and facilities are accessible to all. The town centre will benefit from increased connectivity with other parts of the borough, and beyond through sustainable transport linkages.

Wealdstone will strive to become a vibrant centre, with its own distinctive identity. The centre will be a vibrant hub supported by local residents and a strong business community, whose presence has been transformed by the intensification of employment and carefully managed redevelopment of surrounding industrial estates.

The Station Road corridor will have benefited from redevelopment and environmental improvement linking the Wealdstone and Harrow town centres together.

Harrow-on-the-Hill Station, Harrow Bus Station and Harrow & Wealdstone Station will be accessible major public transport nodes with step free access. Harrow-on-the-Hill station and surrounding area will benefit from a comprehensive redevelopment providing a new focal point for the Harrow Town Centre comprising retail, leisure, office and residential uses. This redevelopment will have contributed to a vibrant new character achieving high standards of sustainability, public realm and residential quality.

Improved pedestrian connectivity and wayfinding between Harrow town centre and Harrow-on-the-Hill will increase legibility in both locations.

The borough's other town centres will accommodate development opportunities commensurate to their character, role, and function.

The Borough's Metropolitan Open Land, Green Belt and other open space will be maintained and enhanced as an interconnected network of green infrastructure and open watercourses supporting biodiversity and healthy lifestyles. Access to green infrastructure will be enhanced.

The quality and accessibility of open space will be maintained, and better provision for children's and teenagers' accessible recreation and playspace will have been made.

Harrow's identified heritage assets and historic environment will continue to be valued, conserved, enhanced and celebrated. Areas of special character and architectural significance will be protected.

North Harrow District Centre will be restored as a vibrant local shopping and service centre meeting the needs of residents and supporting local business.

The vitality and character of Pinner High Street will have been preserved and enhanced.



In Stanmore, mixed use retail and residential development will have strengthened its function as a District Centre, access to natural green space will be maintained and accessible to residents and visitors.

Partnership working with the neighbouring boroughs of Barnet and Brent will have secured co-ordinated public realm enhancements to Edgware, Burnt Oak, Kingsbury and Kenton centres, and will have provided improved connectivity between Kenton Station and Northwick Park Station.

Appropriate development will occur on small, brownfield sites in sustainable locations close to town centres, and train and underground stations.

The leafy, suburban character of the Borough's residential Metroland areas, outside sustainable locations, will have been safeguarded as areas of low density, family housing.

Optimising development opportunities on sites across the Borough will provide high quality housing to suit the needs of a range of residents, while respecting the appearance of residential character areas.

Employment land will be directed to appropriate locations remaining flexible and adaptable to meet current and future needs. A sufficient supply of industrial land will be provided and maintained to meet current and future needs.

Harrow will maintain or increase its market share of retail expenditure to secure the vitality and viability of the Borough's town centre network and meet local needs.

### Reasonable Alternatives

**Alternative 1: Retain existing spatial strategy** – the proposed spatial strategy is considered an evolution of the existing strategy, in that it directs the majority of growth to the Harrow and Wealdstone Opportunity Area. It is however considered that the current strategy needs updating to respond to increased housing targets in the London Plan and changes in the economy and broader society since the current the Core Strategy was adopted in 2012. It also needs to respond to environmental issues such as climate change and biodiversity.

**Alternative 2: Seek to go beyond the level of development identified in the proposed strategy** – such an approach would go beyond the minimum housing targets set for Harrow in the London Plan, and beyond the objectively assessed need for employment, retail and cultural / leisure floorspace. Such an approach would meet a greater proportion of the Borough's Objectively Assessed Housing Need (as calculated by the Government's Standard Methodology) for housing. To do so however would require developing green field / Green Belt / Metropolitan Open Land sites, employment land, sites in less sustainable locations within the boroughs, or at densities and heights significantly above the predominantly suburban nature of most of the borough. Such an approach would risk being contrary to the evidence base informing the Local Plan (such as the need to retain open space and employment land, the Characterisation study of the borough, or NPPF / London Plan requirements relating to Green Belt / Metropolitan Open Land). It would however contribute to closing the gap between minimum London Plan housing targets for the borough and actual objectively assessed need and is considered a reasonable alternative, but not the Council's preferred option when the NPPF and London Plan are considered in their entirety.

*Appendix C Chapter 02: High Quality Growth*

**Strategic Policy 01: High Quality Growth** – no reasonable alternatives identified.

**Policy GR1: Achieving a High Standard of Development** – no reasonable alternatives identified.

**Policy GR2: Inclusive Neighbourhoods** – no reasonable alternatives identified.

**Policy GR3: Public Realm and Connecting Places** – no reasonable alternatives identified.





**Policy GR4: Building Heights** – no reasonable alternatives identified.

**Policy GR5 View Management** – no reasonable alternatives identified.

**Policy GR6: Areas of Special Character** – one reasonable alternative identified

- A. Proposals affecting an area of special character will be assessed regarding:
- a. The impact of the proposal upon the strategic value of the area of special character;
  - b. The desirability of preserving or enhancing the environmental, architectural, historic and landscape features that contribute to the area of special character; and
  - c. The protected views to and from areas of special character.
- B. Proposals that would realise sustainable opportunities for increased appreciation of, or public access to, areas of special character will be supported.
- C. Proposals that would substantially harm an area of special character, or its setting, will be refused.

**Reasonable Alternative 1: No Policy Option:**

The draft policy seeks to protect the contribution that the elevated parts of the borough make to the distinctive local character of the borough. There is however no formal obligation under the NPPF nor the London Plan to include such a policy nor designate such areas on the Policies Map. It would therefore be a reasonable alternative not to include a policy / designation. Such an alternative would however impact on the Council's ability to set out expectations for development and protect the areas that have been identified within the borough as having special character, and by reason of their elevated nature, harm by new development is likely to be exacerbated over a wider area. Such an option is therefore not the Council's preferred option.

**Policy GR7: External Lighting** – no reasonable alternatives identified.

**Policy GR8: Shopfronts & Forecourts** – no reasonable alternatives identified.

**GR9: Outdoor advertisements, digital displays and hoardings** - no reasonable alternatives identified.



## Reasonable Alternatives:

### **Policy GR10: Infill and backland sites, back gardens and amenity areas-** two reasonable alternatives identified

#### *General*

- A. Proposals on Infill, backland sites, [non-designated] open space, garden land and garage sites will only be acceptable where;
  - a. The proposal would be a high-quality design of a scale and intensity appropriate within the context it is located in;
  - b. Proposals assist in the delivery of homes as demonstrably needed [Strategic Housing Policy 03].
  - c. Neighbouring amenity is protected in terms of access to daylight, sunlight and actual or perceived privacy, in accordance with Policy GR1
  - d. Ensure a satisfactory quantum and quality of landscaping to provide for amenity space and biodiversity enhancements.
  - e. Appropriate levels of car parking is provided commensurate to the scale of development, with servicing and refuse collection adequately addressed.
  - f. The proposal is accessible to all; and
  - g. Addresses any relevant supplementary guidance.

#### *Infill Sites*

- A. Proposals for gap sites located in an established street scene will be supported where they:
  - a. Demonstrate compliance with A (a-g) above;
  - b. Ensure sufficient private garden / amenity space is provided for both the proposal site and any donor property; and
  - c. Satisfactory servicing, waste and cycle storage is provided.

#### *Backland Development*

- B. Proposals that are located on backland sites will be supported where they;
  - a. Demonstrate compliance with A (a-g) above;
  - b. Provide satisfactory access to the development;
  - c. Ensure appropriate waste servicing can be provided; and
  - d. Ensure secure by design measures have been addressed.

#### *Non-designated open space*

- A. Proposals for new housing on non-designated open space will be supported where they;
  - a. Demonstrate compliance with A (a-g) above;
  - b. Ensure highway safety is maintained; and
  - c. Address any relevant supplementary guidance.

#### *Garden land*

- B. Proposals for new housing on rear gardens will be resisted unless they;
  - a. Demonstrate compliance with A (a-g) above; and
  - b. Form part of the comprehensive development of a number of plots.

E.1 Housing on individual rear gardens will not be supported.



### *Garage sites*

- A. Proposals that seek to redevelop garage sites within a development will be supported where they:
- a. Demonstrate compliance with A (a-g) above; and
  - b. Satisfactorily demonstrate the loss of garages will not cause or exacerbate parking pressure within the surrounding network.

**Alternative 1 - No Policy Option:** This would impact on the Council's ability to set out expectations for development and protect the character and amenity of the Borough, particularly in the predominately suburban areas that are a key characteristic of the borough. Consequently, this alternative is not the Council's preferred option.

**Alternative 2 - More permissive policy:** The Strategic Housing Policy 03 identifies the amount of housing required, and where this is being strategically directed to, which is within the Harrow & Wealdstone Opportunity Area (a minimum of 7,500 dwellings). By strategically directing growth to the most sustainable location within the borough, there would be less requirement to deliver housing within suburban Harrow which would contribute to retaining its low-density, suburban character. A reasonable alternative would however be to include a more permissive policy. This however is not the Council's preferred option as such a policy could result in an inconsistency with overarching approach to direct growth to the most sustainable location within the borough (the Opportunity Area), and area capable to accommodate the most change in the borough having regard to matters such as prevailing character and building heights, and site availability). Furthermore, a more permissive policy may result in a level of change that the suburban areas of Harrow are not able to comfortably adapt to a significant amount of change that an overly permissive policy may result in.

**Policy GR11: Planning Obligations** – no reasonable alternatives identified.

## 1.3 Chapter 03: Heritage

**Strategic Policy 02: Heritage** – no reasonable alternatives identified.

**HE1 Heritage Assets** – no reasonable alternatives identified.

**HE2 Enabling Development** – no reasonable alternatives identified.



## 1.4 Chapter 04: Meeting Harrow's Housing Needs

### **Strategic Policy 03: Meeting Harrow's Housing Needs– two reasonable alternatives identified.**

#### **Housing delivery:**

- 1 The Council will optimise opportunities to deliver a minimum of 16,040 (net) homes during the Plan period (2019/20 – 2040/41), of which at least 8,020 new homes (net) will be delivered between 2019 -2029 (Policy H1, London Plan), to address the future needs within the most sustainable locations of Borough. Based on current estimates of Borough housing capacity from all sources, the 10-year housing delivery target will be met; and there may be a potential shortfall in the final phase of the Plan (.i.e. 10-15 yrs), but this will be fully addressed by the end of Plan period.
- 2 The London Plan (2021) includes a target to deliver a minimum of 3,750 (net) homes on small sites (below 0.25ha) across the Borough between 2019 -2029.
- 3 The Council will support the delivery of new housing on a range of suitable sized sites, prioritising previously developed land, within the following locations;
  - A Harrow and Wealdstone Opportunity Area: A minimum of 7,500 will be delivered through extant permissions and on allocated sites within the opportunity area.
  - B Rest of the Borough: A minimum of 2,500 will be delivered through extant permissions and on allocated sites across the rest of the Borough.
  - C Small Sites: A minimum of 4,125 new homes on small sites (below 0.25ha) will be supported on allocated sites within the Plan and windfalls sites, in locations with good public transport accessibility (PTAL 3-6) and on sites within 800m of a tube, rail station or Major or District town centre boundary, providing they are sensitively designed to protect and enhance the character of the Borough, particularly suburban areas.
  - D Windfall sites: Development of new housing on suitable sites (below/above 0.25ha), not identified within the Local Plan will be supported, provided it does not adversely impact the character of area, the existing and planned capacity of infrastructure and complies with other policies of the development Plan.
- 4 New development will be directed towards the locations where infrastructure has the most capacity to accommodate new homes, whilst respecting their local distinctiveness, local character and protecting the borough's physical, natural, historic environment, as well as recognising the most accessible locations (PTAL 3-6) of the Borough will change over time. Development within suburban areas that have a low public transport accessibility and limited infrastructure capacity will be of a modest scale and will be required to protect, enhance and re-enforce the unique character of these locations.



## Housing Choice

- 1 Development will be expected to provide a choice of housing and deliver inclusive, mixed and sustainable communities to address local and strategic housing needs, across the Borough. This will be achieved through;
  - A Genuinely Affordable housing: Over the plan period the Council seek to ensure; at least 50% (8,000) of all new dwellings delivered from all sources of housing supply across the Borough will be affordable to low-income groups. At least 70% of all these will be low cost rented housing and the remainder will be Intermediate products which will be genuinely affordable based on lower quartile/median housing costs and incomes of Harrow residents.
  - B Mix of Housing by size: A strategic target has been set to ensure a minimum 25% (4,000) of all new dwellings delivered are three bed (or more) family sized dwellings across the Borough over the plan period.
  - C Specialist older people housing:
    - (a) The housing needs of older people will be met through:
      - (i) Prioritising the delivery of new conventional residential accommodation in C3 use class, designed to be adaptable to the varying needs of users over their lifetime, as well as via retrofitting the existing stock.
      - (ii) The delivery of specialist older persons accommodation (C3) with different levels of support, and care home accommodation (C2). These should play a supplementary role to conventional C3 housing that are adaptable to the changing needs over time
      - (iii) The delivery of low-cost rented extra care housing within older person accommodation schemes,
    - b) The Council will work positively with providers, to support the delivery of a minimum 980 units of specialist older person accommodation, comprising of 660 retirement housing units and 320 extra care housing units between 2022-32, to address the future needs of an ageing population. A total of 200 bed spaces for nursing care will be delivered, to address the needs of the elderly population or those who have serious health issues that require specialist care, between 2022-32.
  - D. Supported and specialist Accommodation: The Council will work positively with the relevant authorities such as the NHS and charities, to ensure additional well designed supported and specialist accommodation is delivered, to address the requirements of specific users or groups (particularly marginalised, vulnerable individuals or groups) providing the applicant can demonstrate a need for the proposal. The Council will seek to resist the loss of existing accommodation to other uses, unless the proposal is for re-purposed, enhanced or for re-location of the use and it would comply with other policies in the Plan.
  - E. Non-self-contained accommodation: The Council will support the provision of non-self-contained housing such as Houses in multiple occupancy (HMOs), Hostels, Large Scale Purpose-Built Shared Living (LSPBSL) or Purpose-Built Student Accommodation (PBSA). This is providing;
    - a. A need is demonstrated for PBSA, LSPBSL products and the proposal is not situated on a site that has extant permission or is allocated for self-contained housing
    - b. Proposals make a positive contribution to housing choice and create mixed and balanced communities.



- c. The level of non-self-contained housing provided does not result in an over concentration of such uses, result in harmful amenity impacts and compromise the delivery of additional self-contained housing to meet the future Borough needs and support mixed inclusive communities.
- F. Self-build and custom build housing: The Council will support proposals, for self-build and Custom build housing, particularly community led schemes, to diversify sources of housing supply, speed up housing delivery, encourage innovate design and further housing choice to address local needs. Such developments will need to demonstrate compliance with relevant policies of the Development Plan, particularly in relation to the provision of affordable and family sized housing.
- G. Gypsy and Traveller accommodation: The Council will maintain the existing provision of Gypsy and Traveller pitches. A total of three additional pitches will be delivered between 2016 – 41. The existing identified needs, and if any additional needs arise, will be addressed within an existing site.

### **Estate regeneration**

- 2 The Council will positively work with local communities, existing residents, and other stakeholders to support opportunities that arise for estate renewal and regeneration during the Plan period. This will play an important role to :
  - a. Increase the provision of the right type., size, tenure of housing to address local needs and meet the strategic targets
  - b. Ensure residents have access to additional high quality affordable and family sized dwellings to adequately address the needs of existing and future residents
  - c. Address the causes and impacts of multiple deprivation within them and wider areas (where relevant to the proposed scheme)
  - d. Ensure neighbourhoods and communities benefit from living within high quality environments, with access to communal and other facilities within the estates (if necessary) or wider area, as well as are well designed, safe, inclusive and promote the health and well- being of communities.
  - e. Ensure existing and new residential units achieve high quality design standards
  - f. Promote social interaction, cohesion between the residents to support mixed and inclusive communities.
  - g. Ensure residential accommodation and other facilities are maintained at a decent high-quality standard throughout their life
- 3 The Council will work with a range of stakeholders to support the delivery of phases 2 and 3 of the Grange Farm Estate regeneration scheme during the life of the Plan. This will deliver an exemplary mixed tenure community, with new residential accommodation built to high quality design and Development Plan housing standards, with a range of housing types and tenures, sizes to address the needs of existing and future residents, particularly for families and local income households who require social rented housing.

### **Safeguarding the existing housing stock**

- 4 Existing self-contained C3 housing will be safeguarded in accordance with London Plan policy. Exceptionally, the net loss of self-contained residential accommodation may be acceptable where:



- A. Sub-standard dwellings would be brought in line with London Plan space standards;
- B. The proposal is for specialist non-self-contained accommodation (use class C2) to meet an identified local need in accordance with the requirements of Local Plan policy H8;
- C. De-conversion of flats would create a family size home (3 bed or more)
- D. Providing social or physical infrastructure to meet an identified local need which could otherwise not be met elsewhere.
- E. The net loss of existing affordable housing units and floorspace – overall and in terms of social rented housing – will be resisted.
- F. A change of use from housing to short-stay holiday rental accommodation to be used for more than 90 days a year will be resisted.

**Implementation:**

- 5 The Council will monitor the implementation of the Plan against the above targets, including through the use of the housing trajectory (Appendix XX) and the monitoring implementation framework (Appendix XX), to address future housing needs and maintain a five-land supply of deliverable sites.

**Reasonable Alternatives:**

**Alternative 1: High housing growth**

This would result in the inclusion of a housing requirement of 24,266 dwellings (1213 units per annum) between 2020-41 based on the demographic led approach utilised by the Draft Local Housing Needs Assessment. This is based on 2018 household and population projections and considers factors such as household sizes, mortality, migration, and past suppressed household formation rates of those under 45 years of age.

This approach is not considered the preferred option due to a number of factors. The London Plan (2021) sets a Borough ten-year target of 8020 homes (2019-29) and indicates a target beyond this period should be based on evidence of capacity. Housing monitoring data indicates a total of 8,410 homes were delivered between 2009/10- 2020/21 (i.e. average of 841), which means it is likely to be difficult for the Borough to increase delivery of housing on previously developed sites to meet this within the existing urban area, beyond the London Plan target. This option is likely to require the release of greenfield sites, including within the Green Belt or Metropolitan Open Land (or the potential loss of employment land) and the Local Plan evidence does not demonstrate that any exceptional circumstances exist to justify this approach. There is a high risk that an insufficient level of housing sites may be submitted for permission and come forward for development in a timely manner to meet the annual target and make it difficult to maintain a five-year land supply of deliverable sites and meet the housing delivery test. This would mean the national policy of presumption in favour of sustainable development would apply, which means the Council would find it more difficult to refuse applications for new housing developments, even though they may be of a poor design, location or fail to meet local needs, or have a harmful impact on the natural/historic environment. This is likely to undermine the Plan led system and the promotion of sustainable development.

**Alternative 2 Low housing growth: Stepped trajectory over a fifteen-year plan period**

This would be based on the London Plan ten-year housing deliver target of 8020 homes (2019-29) and the need beyond this period would be based on the 2017 London SHLAA. This would comprise of the indicative capacity of large sites of 921 homes (phases 4: 2029-34) and 138 homes (phases 5:2034 -41), plus the London Plan small sites allowance of



3750 homes (10 years), all of which would total 4809 homes. Therefore, this approach results in a total housing requirement of 12,829 homes over a 20-year period (2021 -41). This assumes a higher housing requirement/need of 802 homes per annum over the first ten years (2019-29) and a lower need of 481 homes per annum during the final phases of the Plan. It should be noted the NPPF requires Plans to cover a 15-year period from the date of adoption.

The key advantages of option 2 are it may help address housing needs of the Borough in the early years of the Plan period, but there is uncertainty in relation to whether this may result in the delivery of the right size, tenure of housing (i.e. affordable and family) to address local needs, as a large proportion of the target will have been already met by existing permissions, constructions and completions, prior to the Plan being adopted. It may also have less of a potential impact on the infrastructure capacity, natural and historic environment.

This approach is not considered the preferred option, as it would fail to address the acute housing needs of the Borough, particularly for family and affordable housing. The London Plan (2021) states that any capacity beyond 2029 “should draw on the London 2017 SHLAA findings and any local evidence of identified capacity “. Therefore, the housing requirement/target will need to be based on updated local evidence of the housing capacity of the Borough. Further, this option will be highly reliant on windfall housing sites to come forward for development during the final phases of the Plan. This will undermine the Plan led system, make it more difficult for the Council to refuse both poorly designed, and poorly located proposals and to ensure proposals will address local needs, secure and deliver the supporting infrastructure and promote sustainable development.

### **Policy HO1: Dwelling Size Mix– two reasonable alternatives identified.**

#### **A. Dwelling size mix priorities**

- 1 All developments for conventional residential must provide a good mix of unit sizes, to adequately address the Borough’s housing needs, particularly for families, as well as contribute to and support the creation of inclusive and mixed communities. To achieve this, proposals must apply the following sequential approach to housing priorities:
  - A. i) Ensure a minimum of 25% of all units within a scheme are family sized dwellings (three bedrooms or more) and a higher proportion will be required on suitable sites;
  - B. ii) the remaining dwelling size mix will be determined on a case-by-case basis having regard to:
    - a. Need to provide an appropriate mix of dwelling types reflecting the most up to date evidence as set out in the Local Housing Needs Assessment (or successor documents) and local housing register;
    - b. Site size and its physical characteristics (including any identified constraints on the preferred housing mix);
    - c. Location of the site, the surrounding context, character (including town centre location) and the Public Transport Accessibility Levels;
    - d. Need to optimise housing output on previously developed land;
    - e. The range of tenures and the extent to which flexibility around the mix of market units could secure the delivery of additional affordable dwellings; and
    - f. Potential for custom-build and community led schemes.





2 Development that fails to adequately accord with the delivery of the above requirements will be resisted, unless robust evidence demonstrates it would be unsuitable due to site/design considerations or be financially unviable.

3 The smallest 2-bedroom dwellings for both market and affordable homes provide a minimum of 4 bed spaces in accordance with the minimum internal space standards for new dwellings set out in London Plan Policy D6, to ensure flexibility to the changing circumstances of households and avoid overcrowding.

**B. Flatted developments**

4 Flatted developments will be required to give the highest priority to the provision of accommodation for families, on the lower floors of the scheme, with direct access to a private garden or communal amenity space. These should be well designed to address the needs of family members who may be disabled and elderly. Proposals that fail to meet this requirement will be resisted, unless it can be demonstrated that the scheme would result in a poor-quality living environment for families; based on the above criteria.

**C. Housing schemes solely comprising of smaller units**

5 Development proposals comprising solely of studios and/or 1 bedroom, 1 person units, or those that will result in an overconcentration of 1- or 2-bedroom units on an individual site, will be resisted unless it can be suitably demonstrated that the housing provision:

- a. Is in an area with higher Public Transport Access Levels (i.e. PTAL 3-6); and
- b. Forms part of a larger development, or is located within an area for which a masterplan has been adopted or endorsed by the Council, which includes provision for a mix of unit sizes, including a reasonable number of family-sized dwellings (3+ bedrooms); or
- c. Provides for a balance in the mix of unit sizes in the area; or
- d. Is the only housing format deliverable by reason of site size, site configuration or other development constraints, and where a studio unit is proposed.

6 An exception to the above (5) will apply to proposals for older person accommodation/other types of occupants with specific needs and it can be demonstrated 1-bedroom units is the most appropriate form of accommodation.

**D. Monitoring**

7 The Council's dwelling size priorities will be subject to periodic review and updated when new assessments of housing need are commissioned.

F. Through the Authorities Monitoring Report (AMR) the Council will set out progress on delivering these priorities and building the right homes for the next generation. The AMR will assist in informing the Council's consideration of dwelling mix on a site-by-site basis.



## **Reasonable Alternatives:**

### **Alternative 1: Continue with existing policy DM 24 Housing mix**

This is highly permissive. It seeks to ensure mixed and inclusive communities. The mix is determined by target mix for affordable housing, the need to increase delivery of affordable housing, site location, character of surroundings and the need to optimise housing output on previously developed land site. This policy provides no specific requirements for the size of units required for market housing that will form a significant proportion of future housing delivery and will reduce the scope of the Council to secure a higher proportion of larger dwellings or medium sized accommodation that are suitable for addressing the needs of families. This policy is not considered the preferred option, as it is likely to result in the delivery of a larger level of smaller units that will not assist in delivering against the evidenced needs of the borough as set out in the Draft LHNA.

### **Alternative 2: Do not include a target to that seeks to ensure 25% of housing delivered on a scheme are family sized dwellings (.i.e. three bed or more)**

This approach is not considered the preferred option, as it is likely to reduce the level of family sized dwellings delivered. Key reasons are, it would reduce Councils scope to require a higher proportion of family or medium sized dwellings that are suitable for families, as well require applicants to provide evidence they have considered this. This is likely to encourage developers to build at higher densities and increase the number of smaller units, to maximise development value. Further, this would be contrary to the good planning practice of assessing the effectiveness of policy via the plan, monitor and manage approach.

### **Alternative 3: include a target in excess of 25% for the proportion of housing on a scheme that should be for family housing**

The Draft LHNA indicates there is a significant need to increase the delivery of family housing. This indicates 70% of all future housing delivered should be three bed (or more) family dwellings, based on a requirement/target of 16,040 homes during the Plan period. This approach to set a target to deliver family housing in excess of 25% is not considered the preferred option, as there is need to achieve a balance between a set of competing factors such as; the type of sites that are likely to come forward for development, their locations; the need to optimise output of sites to increase the delivery of housing to meet future needs; as well as ensure the deliverability of sites. Further, the Council's Annual Monitoring Report indicates that the Borough had difficulties in achieving a target of ensuring 25% of all housing are family sized housing during the previous Plan period.

### **Alternative 4: Do not apply 25% family housing target to minor development**

This approach is not considered the preferred option, as the London Plan anticipates that 47% of the Borough's future housing supply will come forward from small sites (below 0.25h). Therefore, this will reduce the Council's scope to increase provision of family housing from all the sites that come forward for development and address local needs.



**Policy HO2: Conversion and redevelopment of larger dwellings— six reasonable alternatives identified.**

- 1 To effectively manage housing growth and ensure that residential conversions into multiple homes do not have a detrimental impact on the character, stock of family sized housing and amenity of local areas; permission will only be granted for proposals for the conversion of larger homes into smaller self-contained residential units (C3) where the criteria below are met:
  - a. The internal floor area of the existing dwelling should exceed 130m<sup>2</sup> (as originally built) or could be accepted to be extended to this size; where 2 self-contained residential units or more are proposed.
  - b. The conversion should provide at least one larger family sized home with a gross internal floor area of at least 74 m<sup>2</sup> and be capable of providing a 3-bedroom, 4-person dwelling on the ground floor or if this is not possible on the upper floor(s); with access to a dedicated rear garden of the converted home.
  - c. The site is within area of PTAL 3-6
- 2 Exceptions to criteria 1a and 1b will only be allowed where the amenity of the existing family sized home is so deficient that family occupation is unlikely, and it could not reasonably be changed to overcome such deficiencies
- 3 Proposals will be required to;
  - a. Comply with the minimum internal space standards of the London Plan
  - b. Ensure the converted flat on ground floor is well designed to adequately meet the needs of a range of future residents, particularly older persons and those with physical disabilities.
  - c. Achieve configurations that are practical and fit for purpose, having regard to circulation, storage space, room size and shape and relationship with other homes;
  - e. Ensure homes are dual aspect and that all habitable rooms have a satisfactory environment in terms of privacy, daylight, sunlight, outlook and exposure to external noise;
  - f. Make adequate arrangements for the provision of amenity space for future occupiers of the development;
  - g. Make adequate arrangements for the storage and collection of waste and recycling material generated by future occupiers of the development which does not give rise to harm to; the character, amenity of the area; and for future and neighbouring occupiers;
  - h. Ensure that the design of any external alterations does not detract from the appearance of the property or the street scene and, wherever possible, retain a single door to the front elevation of dwellings in residential areas;
  - i. Ensure that the balance of hard and soft landscaping on the forecourt (including forecourts that are already substantially hard surfaced) does not detract from the appearance of the property or the street scene;
  - j. Make adequate provision for parking and safe access to and within the site and not lead to any material increase in substandard vehicular access; , including safe and accessible cycle storage



- k. Ensure that levels of external activity would not be detrimental to residential amenity and character.
- l. Demonstrates compliance with any relevant supporting guidance
- 4 Proposals for extensions and alterations to converted houses and other residential premises will be supported having regard to the above criteria.
- 5 Proposals that would lead to an over intensive conversion, redevelopment or which would compromise any component of this policy, will be refused.
- 6 The Council will also apply the above criteria to any proposals for the demolition and redevelopment of a larger home to provide 2 flats and the housing mix policy will apply to proposals will result in three (or more) residential units

### Reasonable Alternatives: .

#### **Option 1: Continue with the approach of the existing development management policy DM26 (i.e. no locational, minimum size requirements or replacement family-size dwelling requirements).**

The existing policy generally permits proposals for the conversion of houses to multiple flats, provided they are well designed. The advantages of this are; it may increase the delivery of housing and help meet both the London Plan small sites and Local Plan housing target, as well as help demonstrate a five-year land supply of deliverable sites. Further, the potential impact on the character of the Borough is uncertain, as it could potentially spread them across the area or result in impacts being concentrated to a specific area. However to date this has not been identified as a significant problem.

The disadvantages of this approach are; it may result in the continued loss of family housing, which are required to address the future housing needs of the Borough. It is difficult to re-provide any family housing that is lost via conversions through new development elsewhere, as new residential developments may consist of high-density schemes close to/within town centres/stations. Further disadvantages are it may result in the loss of smaller sized, housing (i.e. below 130 sqm) that are more affordable and may result in the delivery of poorly designed flats. This approach is not considered the preferred option.

#### **Option 2: Policy should not include a minimum 130m<sup>2</sup> size threshold for the conversion/redevelopment of homes into flats.**

The advantages of this are; it may increase the delivery of a higher level of residential units, to help meet housing targets (including small sites) and ensure a five-year land supply of deliverable housing sites.

The disadvantages are; it may result in; a higher level of loss of family homes, specifically smaller, more affordable stock poorly designed homes, if smaller units below 130m<sup>2</sup> are converted. It may result in the delivery of a higher level of smaller 1/2 bed flats, even though there is a higher need to deliver family housing of 3 beds or more. It may potentially have a greater negative impact on the character of the area In terms of smaller original homes not being able to accommodate all the ancillary infrastructure (bins / cycle etc). This approach is not considered the preferred option..

#### **Option 3: Policy should not require the re-provision of a family sized flat with a ground/upper floor area of 74m<sup>2</sup> capable of providing a three-bed unit with access to a garden.**



The potential effects of this policy may be similar to option 1. This approach is not considered the preferred option.

**Option 4: Policy should not include any reference to locations with a Public Transport Accessibility Level of 3-6**

The potential advantages of this are; it has the potential of increasing the amount of housing units delivered on , to meet the housing target and demonstrate a deliverable supply of housing sites to meet the five-year land supply.

The potential disadvantages of this are; it may result in the increased loss of family housing (.i.e. policy not only apply in PTAL 3-6) and as it may result in conversions in more locations of the Borough. This may have an uncertain impact on the character of the Borough, depending on whether more conversions are implemented within certain locations or not. This approach is not considered the preferred option.

**Option 5: The proposed housing conversions policy should not apply to demolitions of a larger family sized home.**

The points raised for option 2 above apply to this option. Overall, this is likely to result in the net loss of family housing. This approach is not considered the preferred option.

**Option 6: Restrict the application of the conversions policy to certain areas and exclude it from others, via defining the boundaries of these on a map**

The potential positive impacts of this approach are; it could provide clarity for all stakeholders in relation to which areas of the Borough are appropriate for housing conversions to flats; identify, assess the potential adverse impacts and sets out policy measures to address these.

The potential negative impacts of this are; it may be difficult to clearly identify, assess the areas where the conversion policy should apply (or not) and formulating evidence to support this may be a time-consuming exercise. There is a risk that this approach may be contrary to the London Plan Small Sites Policy that supports the incremental intensification of existing residential areas of existing residential areas. This approach is not considered the preferred option.

**Policy HO3: Optimising the use of small housing sites – no reasonable alternatives identified.**

**Policy HO4: Genuinely affordable housing– one reasonable alternatives identified.**

**Targets**

- 1 Affordable housing will be required to be delivered on site (except for LSPBSL), to promote mixed and inclusive communities, unless exceptional circumstances can be demonstrated (refer to (E) below).
- 2 Proposals for major residential and mixed-use development (10 units or more) must demonstrate they have sought to optimise the housing output on a site and apply the threshold approach included within Policy H5 of the London Plan, to increase the delivery of genuinely affordable housing, as well as demonstrate all options have been explored to achieve the Boroughwide target of 50% affordable housing, based on habitable rooms or floor space. Subject to the threshold approach, public sector land, Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites, will all be required to deliver at least 50 per cent affordable housing on each site.
- 3 The following will be considered when assessing the maximum level of genuinely affordable housing that could be delivered:
  - a. Their contribution to the Borough’s strategic affordable housing target, subject to viability and application of the threshold approach.



- b. The need to make the most efficient use of land to facilitate and optimise the delivery of affordable housing.
  - c. The proposed tenure mix of the scheme and the need to prioritise the delivery of social rented and affordable family housing, in line with the table below.
- 4 Development proposals will carry greater planning benefit ,where they demonstrably deliver the maximum viable amount of genuinely affordable housing whilst meeting the minimum threshold level of affordable housing without public subsidy, (Policy H5 of the London Plan),
  - 5 Applicants will then be expected to make all reasonable efforts to secure grant funding to deliver an increase in affordable housing beyond the level that would otherwise be achievable. The Council will work positively with development industry partners to help identify opportunities to secure grant funding to deliver more genuinely affordable housing in Harrow.
  - 6 The affordable housing requirements for major developments will apply in circumstances where development has already been permitted (or is under construction) and 10 or more dwelling units will be delivered taking into account of the following:
    - a. New residential units that are proposed which would result in an uplift in the overall number of units on the site;
    - b. Development that is proposed on an adjacent site which by virtue of its layout, design and use is functionally related to the extant permission and would result in an uplift in the overall number of units across the sites; and
    - c. Exception to the above applies, if the applicant demonstrates ownership has changed and no relations with the original landowner/developer.

**B. Tenure mix (see tenure products definitions in Appendix YY)**

- 7 Major residential development will be required to provide a tenure split of 70 per cent low cost rented homes (social rent or as per London Plan Policy H6) and 30 per cent intermediate product homes (London Living Rent or shared ownership), in line with the Local Housing Needs Assessment (or any subsequent updated evidence). The intermediate products should meet the definition of genuinely affordable housing. These must be for households within the most up to date income caps identified in the range for different local income brackets/dwellings within the London Plan Annual Monitoring Report.

**Reasonable Alternatives:**

**Table XXY: Identified needs by affordable housing tenure**

Tenure of housing	% required
Low cost rented (Social rented or as per London Plan)	70%
Intermediate: Affordable home ownership and / or London Living Rent	30%
Total	100%

- 1 The Council will prioritise the delivery of social rented housing over other affordable housing products as these are most appropriate to address local needs, when negotiating the tenure mix of schemes. The factors below will be considered, when assessing an appropriate tenure mix:



- a. The need to prioritise the delivery of a higher proportion of social rented housing in the mix of affordable housing;
  - b. Evidence to demonstrate that the proposed tenure mix will deliver mixed inclusive communities within the locality;
  - c. Compliance with the requirements of Policy HO1: Dwelling size mix. Proposals should ensure they meet the full range of housing needs, particularly those of low-income households who require family housing;
  - d. Evidence of meaningful discussions with Registered Providers which have informed a different tenure, size of units and design to address local priorities and explored funding opportunities and informed the capital value of the affordable housing; and
  - e. Evidence to demonstrate a different tenure mix will lead to a higher quantity of affordable housing and provide products that are genuinely affordable for a range of household incomes to address local needs.
1. The affordable housing provision within Build to Rent developments will be expected to be 100 per cent at Discounted Market Rents at an equivalent rent to London Living Rent or lower. The applicant will need to demonstrate the rents are set at a genuinely affordable rent levels and allocated to those on the waiting list in accordance with a local eligibility criteria.
  2. The affordable housing Community-led housing scheme products within community-led housing schemes, may be provided in a different tenure (via prior discussions with the Council), providing it is genuinely affordable and meets identified housing needs.

**C. Viability tested route**

3. Site-specific viability information will only be accepted in exceptional cases, determined by the Council. Any proposals where site-specific viability evidence is accepted must provide the maximum amount of affordable housing, informed by detailed viability evidence. This should be based on the methodology and assumptions set out London Plan, and the Affordable Housing and Viability LPG. The cost of any independent review must be covered by the applicant.
4. To maximise affordable housing delivery and address economic uncertainties that may arise over the lifetime of a development proposal, the use of 'review mechanisms' will be required, where appropriate, and implemented; in accordance with the London Plan and any associated guidance.

**D. Offsite contributions**

5. To promote inclusive and mixed communities all new affordable housing provision should be delivered on-site. Off-site provision or payment in lieu for major development proposals will only be considered in exceptional circumstances, where it can be demonstrated to the satisfaction of the Council that:
  - a. It is not practical or feasible to provide affordable housing on-site due to site development constraints; and
  - b. where off-site provision is proposed:
    - i. A higher level of affordable housing can be secured through provision on an alternative site;



- ii. Off-site provision is necessary to better meet priority housing need, such as for affordable family housing; and
- iii. The provision will better support inclusive and mixed communities.

#### **E. Vacant building Credit**

1. The application of the Vacant Building Credit (VBC) is not appropriate in Harrow. The use of VBC will only be considered in limited circumstances, where applicants address the criteria below :
  - a. The building is not in use at the time the application is submitted;
  - b. The building is not covered by an extant or recently expired permission;
  - c. The site is not protected for an alternative land use; and
  - d. The building has not been made vacant for the sole purpose of redevelopment, as demonstrated by evidence showing that the building has been vacant for a minimum continuous period of five years and has been actively marketed for at least two years therein, at realistic local area prices.
2. The affordable housing policy will apply to any net increase in the floor space of the vacant building.

#### **F. Mixed and inclusive communities.**

3. To secure inclusive and mixed neighbourhoods and communities the Council may seek to alter the tenure and/or mix of affordable housing provision on a case-by-case basis. In establishing the most appropriate level of provision for a site, development proposals will be considered having regard to the existing levels of housing tenure and mix in the area (including extant permissions).
4. All new affordable housing developments must be of a high-quality design having regard to other Local Plan policies. The design of the units should be 'tenure neutral' in line with the National Design Guide, so that affordable units are indistinguishable from market units in terms of quality of design and materials, space standards, access and amenity. Where mixed tenure schemes are proposed these must ensure all residents of the development have access to amenities and communal spaces including play spaces.

#### **Reasonable Alternatives:**

**Alternative 1: To put a greater emphasis on intermediate products.** The current split seeks to meet priority affordable needs as identified in the Draft Local Housing Needs Assessment (LHNA), but also allow for mixed communities by encouraging the provision of some intermediate products. The LHNA shows that intermediate products are essentially the least affordable of all the tenures to address the housing needs of local residents. Intermediate products are more likely to be occupied by people who have a choice within the market for alternative accommodation, e.g. market rent. Given the number of people who are homeless/ in temporary accommodation, living in overcrowded housing, an increase in intermediate proportions is not considered the preferred option.





**Policy HO5: Housing Estate renewal and regeneration** – two reasonable alternatives identified.

Development proposals involving the renewal and regeneration of the Borough's Housing Estates, including any enabling market housing, must be carried out in consultation with existing residents, the local community and other relevant key stakeholders, in line with the London Mayor's Good Practice Guide to Estate Regeneration. Proposals must ensure;

- A. There is no net loss of affordable housing floorspace, and
  - a). replaces like for like tenure and size; or
  - b). meets the needs of returning residents (subject to a decant strategy); or
  - c). complies with the Council's latest housing needs assessment; and
  - d). where developments seek to introduce market sale housing to enable the estate regeneration, any further uplift in genuinely affordable housing provision should be made. This should be delivered in accordance with Policy HO4: Genuinely Affordable Housing and Policy H5: Threshold Approach of the London Plan
- B. Any affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social rent housing is not facilitating a right of return, it may be provided as low cost rented homes (social rent or as per London Plan Policy H6).
- C. The tenure of additional affordable housing (other than the replacement provision) should comply with Policy HO4: Genuinely Affordable housing; prioritising the need to deliver additional social rented housing.
- D. The size of both market and affordable accommodation provided through estate regeneration schemes should be based on the particular needs of both the existing, and prospective future residents. It must consider the requirements of Policy HO1: Dwelling size mix that prioritises the delivery of additional family sized housing
- E. All affordable housing products are integrated into the development to ensure mixed, balanced and inclusive communities.
- F. Ensure a design led approach is undertaken; to achieve the most optimal and efficient use of land.
- G. A satisfactory quantum of accessible hard and soft landscaping is provided in line with other policies within the Development Plan.
- H. Where a net loss of external amenity space is proposed, on a case by basis, consideration will be given in relation to;
  - a) The existing quantum/quality of external amenity space
  - b) Proposed quantum/quality of external amenity space
  - c) Other planning benefits arising as a result of the loss of external amenity space
- I. A sufficient level of play and informal recreation space is provided in line with the approach set out in London Plan policy S4 and local Plan policies
- J. Estate regeneration schemes increase permeability and integration into the existing urban built form; improve safety and access for walking, cycling and public transport use to local amenities for residents; improve the public realm within the estate; and create new walking and cycling routes through estates as appropriate.



- K. Spaces and facilities are provided to enhance opportunities for social interaction, integration to support strong and inclusive communities that encourage physical activity and healthy living
- L. Compliance with parking standards set out in Policy M2 should apply, unless exceptional local circumstances are demonstrated
  - 2 Proposals for estate renewal, regeneration schemes should be supported by a statement setting out its overall social, economic, environmental, health benefits.
  - 3 Estate regeneration proposals should form comprehensive development schemes, rather than piecemeal proposals. Where only part of an estate is brought forward, it must form part of a wider masterplan
  - 4 The Council will consider the use of Compulsory Purchase Order powers to facilitate the delivery of a comprehensive regeneration scheme, where appropriate.
  - 5 The Council will support proposals for Estate Renewal and Regeneration that demonstrate compliance with above requirements and Policy SP03, including those relating to undertaking a master plan led approach, identifying and addressing location specific issues, and bringing forward a comprehensive scheme

#### **Reasonable Alternatives:**

##### **Alternative 1: Alternative approach would be no policy**

The NPPF / London Plan is silent on the some or all of the matters covered by the proposed Local Plan policy, meaning there would be limited guidance to determine planning applications against, impacting upon the effectiveness of the Plan. This approach is not considered the preferred option.

##### **Alternative 2: Require proposals to re-provide of external open space (amenity space) at an equivalent quantity of the original space (.i.e. no net loss).**

There is a deficiency in accessible open space (external amenity space) within certain parts of the Borough. Many of the Borough estates include designated open space and proposals should seek to ensure, there is no net loss in existing open space provision and where possible seek to meet any standards in relation to the quantity and quantity of provisions. But the potential policy option of ensuring no net loss in existing open space provision (.i.e. no flexibility based on compliance with a criteria) may have adverse impact on the delivery of a higher quality provision, with a range of recreational facilities and the delivery of other planning benefits (e.g. addressing priority housing needs, community needs), as well as may have some impact on the design quality of the scheme and in rare instances the potential deliverability of schemes (.e.g. lower housing output). Due to these factors, option 2 was not considered the preferred option.



**Policy HO6: Accommodation for older people**— three reasonable alternatives identified.

1. Proposals for specialist C3 and non-C3 older peoples residential accommodation such as care homes and extra care facilities will only be suitable where:
  - a) It is demonstrated they would meet an identified local need, particularly to enable older people to live independently
  - b) It would deliver specialist older people accommodation that would contribute to meeting the Local Plan strategic target for specialist older person accommodation
  - c) Affordable housing is provided in line with Policy HO5
  - d) it has adequately considered and addressed all design issues in Part 3 or Part 4 to ensure the accommodation is suitable for the intended occupiers;
  - e) it provides the necessary level of supervision, management and care/support for the intended occupants, which will be secured in a legal agreement;
  - f) it is easily accessible to public transport (PTAL 3-6), shops, services, community facilities (including health) appropriate to the needs of the intended occupiers
  - g) it contributes to mixed and balanced communities.
  - h) Proposals consider and respond positively to the objectives, priorities of the Councils housing and commissioning strategies
2. Extra care proposals will be usually classed as a C3 use. Such proposals must demonstrate that the following design issues have been considered and addressed to ensure the accommodation is suitable for the intended occupiers:
  - a) The proposal is for provision of self-contained units which address requirements for private internal space;
  - b) There should be an appropriate balance between private residential accommodation and communal space for ancillary uses to the primary use of the site.
  - c) Good quality guest and/or staff accommodation (where appropriate) is provided in line with minimum space standards, with sufficient storage space and facilities for visitors and staff;
  - d) There is appropriate privacy of internal spaces in the building for relevant groups, namely residents and any staff accommodation/rooms;
  - e) Appropriate bathrooms, kitchen/laundry facilities and appropriate rooms for activities/therapy/community use are provided;
  - f) Appropriate wheelchair accessibility is provided. At least 10 per cent of dwellings meet Building Regulation requirement to 'Wheelchair Adaptable Category M4(3)(2)(a)' standard or, where Harrow Council are responsible for allocating or nominating a person to live in that dwelling, Wheelchair Accessible Category M4(3)(2)(b) as set out in the Approved Document M of the Building Regulations. All other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'
  - g) Proposals make provisions for a sufficient level, type of private, communal and public amenity spaces and facilities.



- h) The layout and design of communal spaces/facilities should be designed to encourage incidental meeting, interaction and to develop a sense of community
  - i) Demonstrate how the range of type of units and their design will address the needs of people with dementia and other long-term health conditions, and be informed by discussions with providers and demonstrate accordance with the Council's commissioning and housing strategies
  - j) Adequate access, parking and servicing access arrangements are demonstrated, with a safe drop off point within 50m of the main entrance in line with policy M2. This must be appropriate for emergency vehicles
  - k) Provision of suitable charging points for mobility scooters is included on-site – with a minimum standard of secure scooter storage and charging facilities equivalent to 25% of dwellings<sup>1</sup>
3. Care homes must demonstrate the following design issues have been considered and addressed to ensure the accommodation is suitable for the intended occupiers:
  - a) There is an appropriate balance of private residential space and ancillary space associated with the care required for the use
  - b) There is appropriate privacy of internal spaces in the building for relevant groups, namely residents and staff;
  - c) 100% of all habitable rooms are wheelchair accessible;
  - d) Accommodation is provided in line with relevant design guidance and best practice standards; such as set out by the Care Quality Commission;
  - e) Adequate access, parking and servicing access arrangements are demonstrated, with a safe drop off within 50m of the main entrance. This must be appropriate for ambulance/mini bus drop-off;
  - f) Provision of accessible communal outdoor space for use by residents, staff and visitors which is well designed – in terms of its function, layout within development proposals – to ensure a good level of amenity with regard to daylight and sunlight, noise, enclosure, overlooking, privacy and security.
  - g) Adequate level and range of care facilities and support, communal areas/facilities (.i.e. dining areas, lounging area, kitchen meal preparation) offered to address the individuals needs of residents on site
4. The Council will resist development proposals which involves the loss of floorspace in specialist older peoples and care home accommodation unless:
  - a) It can robustly demonstrate that there is a surplus over a long-term of this housing type in Harrow.; or
  - b) adequate replacement on-site accommodation will be provided that satisfies Part 3 or Part 4 or
  - c) adequate replacement accommodation is provided elsewhere in the borough that satisfies Part 3 or Part 4; or
  - d) It can be demonstrated the existing accommodation is unsatisfactory for modern standards or cannot be adopted to meet these to re-provide the use and/or is not fit purpose



## **Reasonable Alternatives:**

### **Alternative 1: Continue existing Local Plan policy approach (DM 29)**

The current Local Plan Policy DM29: Sheltered housing, care homes and extra care housing is highly permissive. It supports proposals if they are located within accessible locations and only allows the loss of such uses if there is no demand. Applying this option is not considered the preferred option, as it is open to wide interpretation. This will make it difficult to ensure right type, size, tenure older person accommodation, with a sufficient level of care/support, is delivered to address local needs. It will not provide a strong basis to ensure proposals are well designed, located to promote independent living and guidance to distinguish between C2 and C3 use class orders.

### **Alternative 2: Support proposals within/edge of town centres (excluding neighbourhood centres)**

This approach is not considered the preferred option, as some of the town centres have a low public transport accessibility rating score, particularly those located to the north of the Borough. Therefore, although older residents may be able to access local services facilities, there is a potential risk this option may result in poor access to public transport and result in social isolation of older people from friends, families or experience difficulties accessing essential services like health care.

### **Alternative 3: Include a higher target to provide 165 units/total of 1980 of accommodation for older people between 2017-29 (12 years) or 2300 units over a 15-year period**

This approach is not considered the preferred option, as the Draft Local Housing Needs Assessment indicates that the rate of older people population growth is likely to reduce after 2029 and Policy H13 indicates Plans should take account of any local needs information, in addition to the indicative benchmark figure for older people accommodation (within C3 use) included within the former policy. Further, the Plan seeks address older people accommodation needs primarily via the delivery of conventional C3 housing that are well designed to meet the changing needs of the occupants throughout the lives. There is a risk that the potential inclusion of a higher target for older people accommodation may undermine the Council's ability to meet other priority housing needs such as family housing and affordable housing.

**Policy HO7: Supported and sheltered housing**– one reasonable alternatives identified.

1. The Council will support proposals for the provision of specialist and sheltered accommodation for vulnerable, disadvantaged individuals or groups of the population; providing;
  - a. It is demonstrated the scheme will adequately address a specific local need
  - b. it is suitable for the intended occupiers in terms of the standard of facilities and the level of independence,
  - c. It provides the necessary level of supervision, management and care/support, security and community safety (where necessary)
  - d. it is appropriately located in areas that there is easy access to public transport, shops, services and community facilities appropriate to the needs of the intended occupiers
  - e. Regard must be had to any best practice standards that the Council considers relevant, and which are related to the specific type of accommodation and the people/groups it is targeted to
  - f. Proposals must consider and respond positively to the objectives, priorities of the Councils housing and commissioning strategies



- g. It contributes to creation of balanced, mixed and inclusive communities and would not result in the over concentration of supported and sheltered housing within a neighbourhood that would result in a harmful impact on the amenities of neighbouring properties and surrounding area.
      - h. . It complies with other relevant policies within the Development Plan
2. The Council will resist the loss of supported and sheltered housing unless:
  - (i) adequate replacement accommodation of the same quality and quantity will be provided for the particular group; or
  - (ii) it can be demonstrated that the accommodation is no longer needed for the particular group or other relevant groups in need of supported/sheltered housing; and
  - (iii) it can be demonstrated that the accommodation is not suitable for the care of the intended occupants (or other relevant occupants of supported/sheltered accommodation) in its current condition and format and/or is incapable of being maintained at an acceptable standard
3. The Council will support proposals for; the alteration, adaptation, extension of dwellings to address the specific needs of household's members with a range of disabilities or specific housing needs (including to provide accommodation for carers or support workers) in order to enable an independent, healthy living environment and promote social inclusion. This is providing proposals shall also comply with other policies in the Development Plan.

### Reasonable Alternatives:

#### Alternative 1: Continue existing Local Plan policy approach (DM 29)

The current Local Plan Policy DM29: Sheltered housing, care homes and extra care housing is highly permissive. It supports proposals if they are located within accessible locations and only allows the loss of such uses if there is no demand. This approach is not considered the preferred option, as it is open to wide interpretation. This will make it difficult to ensure right type, size, accommodation, is delivered to address local needs. It will not provide a strong basis to ensure proposals are well designed, with adequate level of care/support to cater for the needs of vulnerable individuals/groups and are well located to promote independent living and guidance to distinguish between C2 and C3 use class orders.

**Policy HO8: Purpose built student accommodation**– two reasonable alternatives identified.

- 1 Proposals involving the development, redevelopment and/or intensification of purpose-built student accommodation (PBSA) will be supported providing:
  - a. It is demonstrated there is a local or strategic need for the proposal
  - b. Proposals for PBSA must be appropriately located:
    - i. on well-connected sites that are easy to access by walking, cycling and public transport;
    - ii. Within or at the edge (300m) of town centres<sup>1</sup>, which benefit from good provision of shops, services, leisure and community facilities appropriate to the student population,
    - iii. Priority is given to sites located in proximity to the education facility the development is intended to serve, or other higher education institutions



- c. The majority of the bedrooms in the accommodation are secured for use by students over the lifetime of the PBSA, via a nomination agreement with one or more specific higher education provider (HEP). This evidence must include confirmation the proposed rental levels for PBSA are supported by the linked HEP(s)
  - d. A range of accommodation types, including cluster flats with shared kitchen and bathroom facilities, unless it is demonstrated this would be inappropriate
  - e. h. It is well-designed, providing appropriate space standards and facilities and it is sustainable by virtue of being adaptable to alternative residential use or other appropriate town centre uses
  - f. A satisfactory site management and maintenance plan (secured by planning condition) covering the lifetime of the accommodation is agreed by the Council, to demonstrate an acceptable level of amenity and access to facilities for its occupiers and not give rise to unacceptable impacts on the amenities of the occupants of the accommodations and existing residents, neighbouring uses in the surrounding areas.
  - g. The level of PBSA proposals (individually or cumulatively) in a location should not;
    - i) result in the harmful overconcentration of PBSA within a given location and undermine mixed and inclusive neighbourhoods. This will have regard to the character of the area, mix of uses, potential impacts on neighbouring properties and residents within the surrounding area.
    - ii) compromise the delivery of conventional self-contained housing, particularly family and affordable housing to meet the Borough needs, in line with Strategic Policy HO3:
  - h. The maximum level accommodation is secured as affordable student accommodation on-site in line with Policy H15.
- 2 Proposals for any potential ancillary or temporary use of the accommodation during vacation periods should be designed at the outset of the scheme and should ensure;
- i. There is no adverse impacts or risks to the safety, welfare and amenities of the existing students and staff occupying the student accommodation, in compliance with any FE or Council policy/regulations
  - ii. There are adequate design measures to limit/restrict the movement of occupants of the PBSA, temporary /ancillary uses and distinguish between the permanent use
  - iii. There is not an over concentration of similar uses, which can impact the balance and mix of uses that can result in potential harmful amenity impacts
- 3 The loss of existing PBSA will be resisted unless it is demonstrated:
- (a) It no longer caters for current or future needs,
  - (b) It is unsuitable and unviable for operating within the existing use;
  - (c) the floorspace is replaced by another form of residential accommodation that meets other priority Local Plan housing requirements
  - (d) Exception to the above is if the scheme is proposing to replace an existing accommodation with equivalent floor space that meets modern standards .



## Reasonable Alternatives:

**Alternative 1: No Policy.** This approach is not considered the preferred option. This would result in a policy void and make the Council highly reliant on national and London Plan policy for determining proposals. This will give the Council less control to promote good design, ensure development is located within the most accessible locations, prevent an over concentration of such uses and minimise their potential harmful amenity impacts. It will also make it difficult for the Council to ensure development is addressing priority housing needs of the area, such as conventional self-contained C3 housing, family and affordable housing.

## Alternative 2: Allow PBSA schemes within accessible locations with PTAL 3-6

This approach is not considered the preferred option, as PBSA tend to be large scale and may adversely impact the character of residential areas. It may result in the loss of family sized housing areas, if clusters of student accommodation occur in areas where PBSA scheme is located/close to it and may result in other harmful amenity impacts on neighbouring properties.

### **Policy HO9: Large Scale purpose built shared living**– four reasonable alternatives identified.

- 1 Proposals for large-scale purpose-built shared living (LSPBSL) will be supported where they comply with London Plan Policy H16 and the following requirements:
  - a) Proposal will be required to demonstrate how they are meeting an identified local housing need based on local incomes, rent levels and existing/future demographics of the Borough
  - b) Applicants will be required to demonstrate the affordability of the proposed LSPBSL products within their scheme compared with the alternative products within the Harrow private rental sector,
  - c) Proposals should be located within the boundaries of Harrow Metropolitan Centre and Wealdstone District Centre (with a PTAL of 5-6) that form part of the Opportunity Area
  - d) There must not be two LSPBSL schemes within a 250m walking distance of each other, to; avoid an over-concentration of similar uses. To justify a departure from this requirement, applicants will be required to demonstrate exceptional circumstances. Robust evidence will be required to demonstrate:
    - i) There is no appropriate alternative town centre use such as offices, and C1 hotels or mixed-use schemes (where relevant) that would be suitable and viable on the application site
    - ii) There is no appropriate alternative use for the site that would be suitable and viable (including C3 residential or a mixed-use scheme) and
    - iii) It would be unviable, unsuitable to have a LSPBSL scheme developed at a lower scale via multiple uses (preferably in two separate blocks of development) that incorporates part of a site/development for LSPBSL the remainder for alternative uses in line with criteria (i) and (ii) above
  - e) The LSPBSL scheme should not have a detrimental impact to;
    - i) Residential amenity of the neighbouring properties and surrounding area
    - ii) The character of the area
    - iii) The need to support and maintain mixed and inclusive communities
  - f) Proposal on sites with extant permission or allocated for self-contained dwellings will not be supported, to avoid compromise the delivery of conventional housing to address future needs and targets, unless adequate evidence is submitted to demonstrate viability issues





- g) The ground floor of the scheme should be designed and located to be active street frontage or public realm. It must include;
    - i) Flexible workspaces,
    - ii) Public amenities (e.g. restaurants, cafes , leisure facilities) that are accessible to the wider public, to integrated it into the surroundings area, as well as develop inclusive and sustainable communities.
  - h) To support a circular economy, proposals must demonstrate a flexible design and layout, to allow the LSPBSL scheme to be converted/retrofitted to an C1 hotel or C3 self-contained residential uses, or other town centre uses without the need for demolition and rebuild
  - i) Proposal must demonstrate satisfactory servicing arrangements are in place for deliveries, waste management and emergency vehicles and no adverse impact on the safe operations of the highway network, in line with other Local Plan Policies
  - j) The applicant must provide a management plan , to the satisfaction of the Council, to address the requirements of the Policy H16 of the London Plan and the Mayors London Plan Guidance on LPBSHL . This will be secured by way of a S106 agreement.
- 2 The design and layout of LSPBSL schemes in terms of their layout, functional living spaces, level and type of communal facilities must be in compliance with the LSPBSL London planning guidance (LPG)
  - 3 Affordable housing contributions will be required, in accordance with London Plan Policy H16
  - 4 The Council will resist any proposals that seek to reduce the quantity, type or access of amenity provisions included within LSPBSL, after permission has been granted.

### Reasonable Alternatives:

**Alternative 1: No Policy.** This approach is not considered the preferred option. This would result in a policy void and make the Council highly reliant on national and London Plan policies for determining proposals. This will give the Council less control to promote development within the most accessible locations, prevent an over concentration of such uses and minimise their potential harmful amenity impacts. It will also make it difficult for the Council to ensure development is addressing priority housing needs of the area, such as conventional self-contained C3 housing, family and affordable housing.

### Alternative 2: Do not require applicants to demonstrate a need for LSPBSL

Although, this approach may provide developers with more scope to determine the type of housing products that should be provided on their site to address a perceived demand in the local housing market, but it will provide less of an incentive to ensure a local housing need is being addressed. Conversely, it will make it more difficult for the Council to require developers to ensure their scheme is addressing the priority needs of the area, which are conventional self-contained C3 housing, particularly affordable housing and family sized dwellings. Further, LSPBSL products tend to be less affordable than other products in the private rental sector and there is uncertainty on the extent to which it may help other issues such as overcrowded housing, under-occupation and freeing up the stock of family sized housing (e.g. properties in HMOs). The NPPF requires Plans to boost the supply of housing of the right, types, size, tenure in order to address the needs of groups with specific housing requirements (para 60, 62). This approach is not considered the preferred option.



### **Alternative 3: Allow LSPBSL within Metropolitan and Major Town Centres, all areas of PTAL 5 – 6 (car free developments) in line with Policy T6 of the London Plan or PTAL 3-6**

This approach is not considered the preferred option, even though there are small parts of other town centres within the Borough fall within PTAL 5-6 and Edgware is a Major Town centre. The key reasons are LSPBSL schemes need to be built at a high density, with more than four to five storey height, in order to provide a sufficient quantity of communal facilities, manage/maintain the property at a satisfactory level and maintain viability of it. Whilst the character of the Borough comprises of two -three storey in suburban locations and three to four storeys with the town centres and near transport hubs. This means significant parts of the Borough are unlikely to be suitable for LSPBSL schemes due to the potential impact on the character of the area and the need for economies of scale to apply to ensure viability.

### **Alternative 4: Do not include distance test for assessing over concentration of LSPBSL**

This approach is not considered the preferred option, as it will make it more difficult to assess, prevent the potential over concentration of the LSPBSL schemes within a given locality, as well as minimise any potential related impacts on residential amenities, the diversity and mixed of uses and the objective of promoting mixed and inclusive communities. A related issue is that this option may undermine the delivery of conventional self-contained residential accommodation and address the priority local housing needs (.i.e. family sized dwellings, affordable housing). However, the policy includes some flexibility to consider proposals that may be contrary to this requirement, in exceptional circumstances.

**Policy HO10: Housing with shared facilities (Houses in Multiple Occupation) – four reasonable alternatives identified.**

Development proposals for Houses in Multiple Occupation (HMO)<sup>1/</sup> and Hostels with shared facilities in the Sui Generis Use Class will only be permitted, providing they comply criteria below:

- (1) It is located within an area that has a PTAL rating of 4-6 with good access to public transport, local services and facilities.
- (2) It does not result in the loss housing suitable for accommodation by families based on following:

A: Internal floor area should exceed 130m<sup>2</sup> (as originally built) and

B: It should not be located within a residential street or area that is characterised by family housing

- (3) There should be no harmful impact on the amenity of occupiers of neighbouring properties and the character of the area.
- (4) Adequate arrangements are made for the provision of amenity space for future occupiers in terms of access to gardens and communal facilities and areas.
- (5) It is well-designed, with appropriate number of rooms of an adequate size, facilities that provides a high-quality accommodation that satisfies the relevant standards for HMOs in the licencing regime<sup>1</sup>, including the provision of adequate functional living spaces and layouts.
- (6) Adequate arrangements are made for the storage and collection of waste and recycling material generated by future occupiers of the development, which does not give rise to nuisance to future occupiers and neighbouring properties or a detrimental impact upon the streetscape.
- (7) It should ensure all habitable rooms have a satisfactory environment in terms of privacy, daylight, sunlight, outlook and exposure to external noise.



- (8) .It ensures a balance of hard and soft landscaping on the forecourt (including forecourts that are already substantially hard surfaced) that does not detract from the appearance of the property or the street scene;
- (9) Adequate provision is made for car parking and safe access to property and does not result in a harmful cumulative increase on street parking (in compliance with policy M2 Parking) or the safety of other road users.
- (10) It contributes to creating an inclusive community and would not result in the over concentration of HMO's/Hostels within a neighbourhood that would harm the mix, balance and well-being of communities. For HMO's, an over concentration is defined as an instance where three or more of the nearest ten properties are HMO's,( .i.e. 5 on each side of an application site, on the same side of the highway).
- (11) .The Council will resist proposals that result in the loss of good quality hostel accommodation that address a specific local need for vulnerable members section of the community, unless
  - A. It is demonstrated there is no local need for the type of accommodation.
  - B. it is for a for a replacement provision at an equivalent or better standard
  - C. It is demonstrated to be unviable or unsuitable for addressing the needs of its users.
  - D. The replacement provision is addressing a more acute local need (e.g. affordable housing)

#### **Large Purpose-built HMO developments**

- (12) The Council will resist proposals for new large purpose-built HMO developments, as these are not considered the best approach to meeting housing needs in the borough, and can result in a poor-quality living environment for the occupants and potentially significant harmful amenity impacts on the surrounding area. On sites where the Council considers that large purpose-built HMO developments may be an acceptable form of housing in principle, proposals must:
  - a) located within an accessible location to local facilities, services, transport in accordance with criteria 1
  - b) not result in the loss of housing that is suitable for accommodation by families, in accordance with criteria 2 above .
  - b) prevent any harmful amenity impact(s) on the surrounding neighbourhood and the character of the area ( in accordance with criteria 3). A sufficient evidence – including a detailed management plan – must be provided demonstrate this.
  - c) Result in a well-designed and satisfactory living environment for its occupants in line with criteria 4-9 above
  - d) A sufficient level, type, of communal facilities and spaces should be provided to adequately address the needs of the expected level of number occupants. These should not be located in too few locations, conveniently accessed and be designed to encourage incidental meetings, socialising, lounging and recreation between residents, to foster friendships and a sense of community.
  - e) Not result in an over concentration of similar uses and the achievement of mixed, inclusive communities in line with criteria 10.



## **Reasonable Alternatives:**

### **Alternative 1: Continue to apply existing policy (DM30)**

The adopted Local Plan Development Management (2013) Policy DM 30 is considered highly permissive for HMO/hostel proposals. It includes a generic criterion requiring proposals to demonstrate; good accessibility to local facilities, compliance with accessible homes standards and satisfactory living conditions and no adverse amenity impacts. Although this option may help in providing a relatively affordable stock of accommodation the continued use of this is considered inappropriate. The key reasons are; it is open to wide interpretation by all stakeholders and does not reflect the most up to date evidence of need. Further, the use of this will make it difficult for the Council to prevent the overconcentration of HMO's and the potential harmful amenity impacts of these, as well as encourage well designed living environments for residents , prevent the loss of family housing and ensure HMOs are located within the most accessible locations. This approach is not considered the preferred option.

### **Alternative 2: Allow conversion of family houses to HMOs (.i.e. no consideration of the houses internal floor area (130m<sup>2</sup>) and the character of the area)**

This approach is not considered the preferred option, as it will result in the potential loss housing that is suitable for families, including the stock of smaller housing that may be more affordable for low income or younger households. It is difficult to replace the loss of family sized housing due to the type, location of sites that are likely to come forward for development. Further, the change of use of smaller housing (below 130) may result in a poorly designed living environment for the HMO occupants.

### **Alternative 3: Allow HMOS within accessible locations with a PTAL 3-6**

This approach is not considered the preferred option , as this may have an adverse impact on the character and harm the amenities of areas characterised by family housing, as well as increase the potential loss of family housing.

### **Alternative 4: Do not include a specific measure to assess the over concentration of HMO's**

This approach is not considered the preferred option, as it won't allow the Council to assess or prevent the potential over concentration of the HMOS schemes within an area, as well as minimise any potential cumulative related impacts on residential amenities, and achieve mixed and inclusive communities. A related issue is that this may reduce the stock of family sized housing accommodation, which is difficult to provide via new development, which tends to be high density due to location of previously developed sites (.i.e. close to town centres) and their high land values. This may result in families residing in unsuitable, overcrowded accommodation or in poor locations that are at a distance from their social networks and local services/facilities (.i.e. schools).

**Policy HO11: Self-build and Custom build housing** – no reasonable alternatives identified.



**Policy HO12: Gypsy and traveller accommodation**– two reasonable alternatives identified.

- 1 The Council seek to retain the existing Gypsy and Traveller site, at Watling Farm (0.5ha) to provide three additional pitches, to address future traveller needs, unless evidence shows it is no longer required.
- 2 The Council will support proposals for Gypsy and Traveller accommodation, including sites and pitches, providing they are of a high-quality layout, design and contribute to meeting identified local needs and there is no capacity at the existing site at Watling Farm.
- 3 Proposals for new and replacement accommodation must make adequate provision for:
  - a). A suitable and safe access to and from the site, with sufficient space for the manoeuvring of vehicles
  - b). Satisfactory access, parking and servicing arrangements for all vehicles likely to use the site, including emergency services
  - c) basic amenities, including as running water, sewerage/ drainage and waste management
  - d) A site location that is well-integrated into the locality with reasonable access to local shops, services and community facilities including education, health, public transport
  - e) Facilities to serve occupiers of the development, including where appropriate pitches, hardstanding, amenity blocks, and amenity space and play areas
  - f) Appropriate landscaping and planting to address impact on amenity and enable integration of the site with the surrounding environment.
  - g) Measures to minimise any potential impacts on the local environment, including any relevant policy designations for or adjacent to the site that would restrict its use for any type of housing (including but not limited to: Green Belt, Metropolitan Open Land and Sites of Nature Conservation Importance) and the character of the area including visual and amenity considerations
- 4 Applicants must take account of any potential flood risk and the impacts of climate change when assessing the suitability of a sites,
- 5 Development proposals for Gypsy and Traveller accommodation must not pose a risk to public health and safety, and not adversely impact the amenity of site occupants and neighbouring properties

### **Reasonable Alternatives:**

#### **Alternative 1: Alternative approach would be no policy**

This approach is not considered the preferred option, as it would not be regarded as being in general conformity with the London Plan and national Planning Policy for Traveller Sites. This would also mean that the Council would be less able to manage new accommodation as planning applications would be judged against national planning policy rather than locally specific policy criteria.

#### **Alternative 2: Include a Policy based on the accommodation need figure identified by utilising the Gypsy and Traveller definition included within the PPTS (2015)**



The definition of Gypsy and Travellers (G & T) included within the PPTS (2015) excludes those who have ceased travelling permanently. Based on this definition, the West London Alliance GTANA (2018) identified no need to provide additional pitches during the period between 2016 -2033/41. The PPTS definition was subsequently successfully legally challenged based equality and discrimination grounds (2022), as it excludes travellers who are forced to permanently live in brick/mortar accommodation due to legitimate health, age reasons. In this context, identifying needs based on the PPTS definition is not the preferred option, but the Council will monitor any Government response to the successful challenge and adjust the approach to the definition and need figure used in the draft Local Plan policy..

The Council is still awaiting the publications of the GLA London wide GTANA and the findings of this in relation to future G & T pitches need, before determining which definition to utilise and need figure to include in the Plan, to address the accommodation needs of the Traveller community. This may result in additional reasonable alternatives.

## 1.6 Chapter 05: Local Economy

**Strategic Policy 04: Local Economy** – no reasonable alternatives identified.

**Strategic Policy 05: Harrow & Wealdstone Opportunity Area** – no reasonable alternatives identified.

**Policy LE1 Development Principles & Town Centre Hierarchy**– one reasonable alternatives identified.

Proposals for new retail, leisure and cultural development in out of centre locations will be resisted. Any such out of centre developments must;

- a. Undertake a sequential test to demonstrate that there are no appropriate town centre sites, followed by edge of centre sites;
  - b. Be supported by an Impact Assessment for proposals where the floorspace exceeds 400 square meters to demonstrate no harm to centres within their catchment.
  - c. Be supported by a Green Travel Plan to enhance sustainable access between the site and the town centre network
- H. The release of office floorspace will be supported where the sequential approach below has been followed:
- a. Vacant floorspace outside of designated town centres;
  - b. Vacant floorspace within designated Major, District or Local Town Centres.
  - c. Poor quality floorspace within designated Major, District or Local Town Centres; and
  - d. Floorspace within the Harrow Metropolitan Town Centre;
- H.1 Where the building has been vacant for more than 12 months and there is genuine evidence that all opportunities to re-let the accommodation have been fully explored, including evidence of suitable marketing over a 12 month period for office use or other appropriate employment or community uses.



**Policy LE2 Night-time and Evening Economy** – no reasonable alternatives identified.

**Policy LE3 Industrial Land** – two reasonable alternatives identified.

The Council will support new development of industrial floorspace within appropriate locations, where they accord with other relevant policies within the development plan.

**A. Strategic Industrial Locations (SIL)**

- a. Proposals to intensify, increase or modernise floorspace and premises within SIL will be supported where the uses fall within the industrial-type activities below;
  - 1) General Industry (B2) and similar Sui Generis uses
  - 2) Storage and logistics/distribution (Use Class B8)
  - 3) Secondary materials, waste management and aggregates
  - 4) Utilities infrastructure (such as energy and water)
  - 5) Land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure
  - 6) Wholesale markets
  - 7) Emerging industrial-related sectors
  - 8) Flexible (B2/B8) hybrid space to accommodate services
  - 9) Low-cost industrial and related space for micro, small and medium-sized enterprises
- b. New & emerging industrial uses must demonstrate operational compatibility with the wider SIL.
- c. Subdivision of existing industrial floorspace will be supported where it supports appropriate diversification and meets the needs of a specific end user, and does not compromise the existing operators.
- d. Any net loss of industrial floorspace and premises within a SIL will not be supported, and
- e. Proposals that fall within use classes E(g) (ii) & (iii) will be resisted from being located within SIL, and will only be supported where demonstrated to support an existing Use Class B2 or B8 type use.

A.1 Co-location of residential within a SIL will not be supported.

**B. Locally Significant Industrial Sites (LSIS)**

- a. Proposals to intensify, increase or modernise floorspace and premises within LSIS will be supported where the uses fall within the industrial-type activities below;
  - 1) General Industry (B2) and similar Sui Generis uses
  - 2) Storage and logistics/distribution (Use Class B8)
  - 3) Secondary materials, waste management and aggregates



- 5) Land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure
  - 6) Wholesale markets
  - 7) Emerging industrial-related sectors
  - 8) Flexible (B2/B8) hybrid space to accommodate services
  - 9) Low-cost industrial and related space for micro, small and medium-sized enterprises
- b. New & emerging industrial uses must demonstrate operational compatibility with the LSIS.
  - c. Subdivision of existing industrial floorspace will be supported where it supports appropriate diversification and meets the needs of a specific end user, and does not compromise the existing operators.
  - d. Any net loss of industrial floorspace and premises within a LSIS will not be supported;
  - e. Proposals that fall within use classes E(g) (ii) & (iii) will be resisted from being located within LSIS, and will only be supported where demonstrated to support an existing Use Class B2 or B8 type use.
- B.1 Co-location of residential within a LSIS will not be supported.

**C. Non-designated Industrial Land**

- a. Proposals to intensify, increase or modernise floorspace or premises within non-designated industrial sites will be supported where the uses fall within the industrial-type activities specified within Policy A.a above, and subject to compliance with other relevant policies within the development plan;
- b. Mixed use schemes will be supported where they comply with the criteria set out within Policy E7C of the London Plan 2021.

**D. Non-industrial uses on industrial land.**

- a. Proposals that seek to introduce non-industrial uses within an industrial site must demonstrate the ancillary nature of the non-industrial use, or satisfactorily demonstrate it is unable to be located elsewhere within the borough with respect to the principle of development.
- b. Non-industrial uses that are not satisfactorily demonstrated as being ancillary to an industrial use or not demonstrated as being able to be located elsewhere within the Borough will not be supported.





The council will support developments that ensure an appropriate mix of main town centres uses, or that demonstrably contribute to the vitality and vibrancy of the centre or parade.

- A. The Council will support town centre developments that;
  - a. Demonstrably contribute to the vitality and vibrancy of the town centre or parade;
  - b. Are of a scale and intensity commensurate to the size and role of the centre or parade it is located within;
  - c. Provides an appropriate mix of uses within a shopping area or parade, ensuring an over proliferation of Sui Generis uses does not occur;
  - d. The ground floor would have an accessible and active frontage; and
  - e. Community facilities in town centres are able to be supported by the Council where compliant with Policy CI1.
- B. The Council will support mixed-use developments in town centres and parades where;
  - a. The ground floor element complies with A;
  - b. There is a clear and satisfactory delineation of access and servicing arrangements (bin store, cycle storage) between the two uses; and
  - c. Satisfactory mitigation in accordance with the Agent of Change (Policy D13 of the London Plan (2021)).
- C. Residential uses on the ground floor in any town centres or neighbourhood parades will not be supported.
- D. The loss of appropriate town centre uses, community facilities and infrastructure from town centres will not be supported unless compliance with policy CI1 is demonstrated.
- E. Temporary events such as markets and entertainment uses will be supported where;
  - a. They are supported with a management plan agreed by the Council; and
  - b. They do not impact on residential amenity or highway safety.

The Council will resist the loss of any employment, leisure or cultural uses within a neighbourhood parade that provides essential day to day amenities. The loss of such uses will only be accepted where adequate marketing has been undertaken.

**Alternative 1 – allow for the full range of appropriate industrial uses:** An alternative policy could be to allow for all of the appropriate industrial uses set out under Policy E4A of the London Plan (2021) to occur within Strategic Industrial Land and Local Strategic Industrial Sites. By reason of the limited industrial floorspace within LB Harrow, such an approach is not the preferred option as this would mean uses that could occur elsewhere in the borough without adverse impacts would instead occur on the borough's limited amount of industrial land, at the opportunity cost of industrial uses that are more appropriately located on designated industrial land.

**Alternative 2 – allow for co-location:** An alternative policy approach may be to allow for the co-location of housing on Local Strategic Industrial Sites, which is set out as appropriate (subject to process) within the London Plan (2021). By reason of the limited industrial floorspace within LB Harrow, which evidence suggests stock should be maintained to ensure a sufficient amount, and the forecasted ability to meet housing targets without requiring such an option, this is not the preferred option.



**Policy LE4 Culture and Creative Industries** – no reasonable alternatives identified.

**Policy LE5 Tourism and Visitor Accommodation** – no reasonable alternatives identified.

## 1.7 Chapter 06: Community Infrastructure

**Strategic Policy 06: Social and Community Infrastructure** – no reasonable alternatives identified.

**Policy CI1: Safeguarding and Securing Social Infrastructure** – no reasonable alternatives identified.

**Policy CI2: Play and Informal Leisure** – no reasonable alternatives identified.

**Policy CI3: Sport and Recreation** – no reasonable alternatives identified.

**Policy CI4: Digital and Communications Infrastructure** – no reasonable alternatives identified.

## 1.8 Chapter 07: Green Infrastructure

**Strategic Policy 07: Green Infrastructure** – no reasonable alternatives identified.

**Policy GI1: Green Belt and Metropolitan Open Land** – no reasonable alternatives identified.



**Policy GI2: Open Space** – one reasonable alternatives identified

- A. Development proposals must:
  - a. Contribute to the provision, protection and enhancement of high quality, multi-functional, publicly accessible open space, particularly in areas of deficiency;
  - b. Not result in the net-loss of publicly accessible open space;
  - c. Improve access to green space where possible, particularly in areas where deficiencies in access have been identified; and
  - d. Enhance biodiversity and improve access to biodiversity and natural capital.
- B. Major development proposals must incorporate new publicly accessible open space unless it can be clearly demonstrated that this is not feasible, in which case off-site contributions will be required.
- C. Existing open space, sports pitches, recreational buildings, and playing fields should not be built on unless:
  - a. An assessment has been undertaken that clearly demonstrates the open space, buildings or land are surplus to requirements; or
  - b. The loss resulting from the proposed development would be replaced by equivalent or better provision, in terms of quantity and quality in a suitable location; or
  - c. The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
  - d. The development is required for critical social infrastructure, the positive benefits of which clearly outweigh the loss of the current or former use.

**Alternative 1:**

One reasonable alternative to this policy is proposed. This policy specifies that Open Space could be used for the development of community infrastructure in exceptional circumstances. A reasonable alternative would be to make this policy more restrictive, removing this specification and not allowing development of community infrastructure on Open Space land. This alternative would however potentially impact upon the provision of community infrastructure required to support development and the ability for the LPA to consider the overall planning balance for individual community infrastructure proposals impacting upon open space.



### **Policy GI3: Biodiversity** – one reasonable alternative identified

#### Protection of Biodiversity & Natural Capital

- A. Biodiversity and natural capital must be protected and enhanced. Development proposals must be adequately evidenced and follow the Ecological Mitigation Hierarchy.
- B. Development proposals must not result in loss of, or pose direct or indirect negative impacts to:
  - a. Irreplaceable habitats (e.g. ancient woodland) or features (e.g. ancient/veteran trees)
  - b. Sites nationally or internationally designated for nature conservation or geodiversity
  - c. Core areas identified within the Local Nature Recovery Strategies (LNRSs) for London or Hertfordshire
  - d. Other important sites, features or functions where losses or impacts could not be adequately mitigated or compensated for with regard to:
    - 1. LNRS areas;
    - 2. Sites of Importance for Nature Conservation/ Regionally Important Geological Sites;
    - 3. Areas of priority habitat;
    - 4. Populations of protected, priority or locally notable species;
    - 5. Important features (e.g. historic hedgerows);
    - 6. Green or blue corridors or other functional linkages within the local ecological network; and
    - 7. Ecosystem function or resilience.
- C. Development proposals that would increase deficiencies in access to nature will be resisted.

#### Biodiversity and nature recovery

- D. Development proposals should:
  - a. Conserve and enhance Harrow's biodiversity;
  - b. Utilise nature-based solutions to manage environmental pressures;
  - c. Strengthen the Borough's natural capital;
  - d. Improve access to nature where practicable; (link to deficiency in access)
- E. All major and minor development proposals must be supported by a proportionate Biodiversity Net-Gain Plan (BGP) which clearly identifies how the development will minimise harm and maximise biodiversity gain. Proposals will be required to demonstrate compliance with the criteria below and provide:
  - a. A minimum of 2 biodiversity units per hectare;
  - b. A minimum net uplift in biodiversity unit value of 20%;
  - c. A minimum of one wildlife shelter (i.e swift box/bee brick etc.) per residential unit; and
  - d. Details surrounding the delivery, monitoring and maintenance of BNG units, whether wholly on-site, or utilising locally strategic off-setting location(s).



### **Alternative 1:**

One reasonable alternative to this policy is proposed. This policy requires a Biodiversity Net Gain of 20%. A reasonable alternative would be to align with the Environment Act and stipulate that a Biodiversity Net Gain of only 10% is required, this is the status quo for all local authorities. The Biodiversity evidence base shows that a Biodiversity Net Gain of 20% would be achievable for most developments without being too onerous or disproportionately impacting viability.

**Policy GI4: Urban Greening, Landscaping and Trees** – no reasonable alternatives identified.

**Policy GI5: Food Growing** – no reasonable alternatives identified.

## **1.9 Chapter 08: Climate and Nature**

**Strategic Policy 08: Responding to the Climate and Nature Emergency** – no reasonable alternatives identified.

**Policy CN1: Sustainable Design and Retrofitting** – one reasonable alternative identified

### New Buildings

- A. All new buildings should be designed and built to be Net Zero Carbon in operation. They should be ultra-low energy buildings, utilise low carbon heat, contribute to the generation of renewable energy on-site, and be constructed with low levels of embodied carbon.
- B. All new buildings should meet the following standards:

#### Space Heating Demand

- a. All dwellings should achieve a space heating demand of less than 15 kWh/m<sup>2</sup> GIA/yr; and
- b. All non-domestic buildings should achieve a space heating demand of less than 15 kWh/m<sup>2</sup> GIA/yr;

#### Energy Use Intensity (EUI)

- c. Domestic buildings - All dwellings should achieve an Energy Use Intensity (EUI) of no more than 35 kWh/m<sup>2</sup>GIA/yr;
- d. Non-domestic buildings - Non-domestic buildings should achieve an Energy Use Intensity (EUI) of no more than the following (where technically feasible) by building type or nearest equivalent:



Building Typology	EUI Standard
Student or keyworker accommodation, care homes, extra care homes	35 kWh/m <sup>2</sup> GIA/yr
Warehouses and light industrial units	35 kWh/m <sup>2</sup> GIA/yr
Schools	65 kWh/m <sup>2</sup> GIA/yr
Offices, Retail, HE Teaching facilities, GP surgeries	70 kWh/m <sup>2</sup> GIA/yr
Hotels	160 kWh/m <sup>2</sup> GIA/yr

Offsetting (as last resort)

- e. Offsetting will only be accepted as a means to achieving planning policy compliance as a last resort if the building is compliant with all other Net Zero carbon building aspects. In these circumstances, the applicant should establish the shortfall in renewable energy generation to enable the annual renewable energy generation to match the Energy Use Intensity in kWh. The applicant should pay into the Council’s offset fund a sum of money equivalent to the shortfall; this contribution will be secured by way of a planning obligation.

Retrofit of Existing Buildings

- C. The use of sustainable conversion and retrofitting measures will be encouraged and supported to improve the energy efficiency of buildings, as well as the quality of living for their occupants. Retrofitting measures should consider how the building has been constructed, its context, and energy use.
- D. Development proposals for major residential domestic refurbishment must achieve a certified ‘Excellent’ rating under the BREEAM Domestic Refurbishment 2014 scheme<sup>1</sup>. or future equivalent, unless it can be demonstrated that it is not feasible.
- E. Development proposals for major non-residential refurbishment, including mixed-use development, will be required to achieve a certified ‘Excellent’ rating under the BREEAM Non-Domestic Refurbishment scheme, or future equivalent, unless it can be demonstrated that it is not feasible.
- F. Proposals for retrofit of existing buildings must consider impacts on the historic environment, heritage assets, and amenity of the building’s users and neighbours.

**Alternative 1: Development size threshold (not the preferred option)**

The policy outlined above applies to all new buildings, with reasonable exclusions for outbuildings. An alternative policy would have an option that just focusses on major applications / development proposals, (i.e 10+ units) or the small site threshold (sites less than 0.25 ha in size). This option has not been pursued as it would likely undermine the



strategic intent of the policy for all buildings to meet net zero standards, particularly for smaller housing developments of 9 units or less. If this option were pursued, smaller developments would need to demonstrate that they have aimed to make buildings as close to net zero as possible, within the limits of viability. As Harrow is likely to experience significant incremental development outside of the opportunity area (reflected by the indicative small sites target in the London Plan being a significant proportion of the overarching housing target for Harrow), many buildings in the suburban areas would not be required to be net zero, which would be a missed opportunity to minimise carbon emissions and future proof the borough's buildings.

### **Alternative 2: Approach to measuring zero carbon – Part L, Building Regulations**

Outlined below is an alternative option for the Sustainable Design Policy, based on a continuation of the approach of using Part L of the Building Regulations to define and measure carbon / net zero.

POLICY OPTION 1 – Part L, Building Regulations (not the preferred option):

All developments must achieve Net Zero Carbon according to the Building Regulations framework, i.e. a 100% improvement over Part L 2021 and offset their residual emissions.

#### **On-site carbon reduction**

All developments must reduce carbon emissions on-site as much as possible. In terms of regulated emissions, the minimum level of on-site performance required is:

- Domestic buildings: 65% better than Part L 2021
- Office buildings: 25% better than Part L 2021
- School buildings: 35% better than Part L 2021
- Industrial buildings: 45% better than Part L 2021
- Hotel: 10% better than Part L 2021
- Other non-domestic buildings: 35% better than Part L 2021 (tbc)

Buildings must also comply with the other requirements of the Building Regulations Part L 2021, e.g. Fabric Energy Efficiency criterion for domestic buildings and Primary Energy criterion for all buildings and demonstrate compliance at planning stage.

Applicants must undertake Part L 2021 modelling to demonstrate compliance.

Unregulated emissions must also be reduced as much as possible.

#### **Carbon offsetting**

On-site carbon reductions should be maximised as far as possible before any remaining emissions are offset. If the Council is satisfied that the development has maximised on-site reductions, but the development is still short of achieving Net Zero Carbon, the developer is expected to make a cash-in-lieu contribution to the Council's carbon offsetting fund at a price of **£880/tCO<sub>2</sub>** per year over a period of 30 years in order to offset any remaining carbon emissions and achieve net zero carbon.

**Policy CN2: Energy Infrastructure** – no reasonable alternatives identified.



**Policy CN3: Reducing Flood Risk** – no reasonable alternatives identified.

**Policy CN4: Sustainable Drainage** – no reasonable alternatives identified.

**Policy CN5: Waterway Management** – no reasonable alternatives identified.

## 1.10 Chapter 09: Managing Waste and Supporting the Circular Economy

**Strategic Policy 09: Managing Waste and Supporting the Circular Economy** – no reasonable alternatives identified.

**Policy CE1: Reducing and Managing Waste** – no reasonable alternatives identified.

**Policy CE2: Design to Support the Circular Economy** – no reasonable alternatives identified.

## 1.11 Chapter 10: Transport and Movement

**Strategic Policy 10: Movement** – no reasonable alternatives identified.

**Policy M1: Sustainable Transport** – no reasonable alternatives identified.

**Policy M2: Parking** – no reasonable alternatives identified.

**Policy M3: Deliveries, Servicing and Construction** – no reasonable alternatives identified.





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**REPORT FOR: EMPLOYEES'  
CONSULTATIVE FORUM**

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<b>Date of Meeting:</b>	10 January 2024
<b>Subject:</b>	Draft Revenue Budget 2024/25 and draft Medium Term Financial Strategy to 2026/27
<b>Key Decision:</b>	Yes
<b>Responsible Officer:</b>	Sharon Daniels – Interim Director of Finance and Assurance (S151 Officer)
<b>Portfolio Holder:</b>	Councillor David Ashton – Portfolio Holder for Finance and Human Resources
<b>Exempt:</b>	No
<b>Wards affected:</b>	All
<b>Enclosures:</b>	<b>Appendix 1A</b> – Savings and Growth from 2024/25 Budget Process <b>Appendix 1B</b> – Savings and Growth from 2023/24 Budget Process <b>Appendix 2</b> - Medium Term Financial Strategy 2024/25 to 2026/27 <b>Appendix 3</b> – Draft Public Health Budget 2024/25 <b>Appendix 4</b> - Draft Schools Budget 2024/25

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

The Forum is requested to note the report detailing Harrow Council's Draft Revenue Budget 2024/25 and draft Medium Term Financial Strategy to 2026/27, as reported to the Council's Cabinet on 19 December 2023.

The budget and MTFs will return to Cabinet on 15 February 2024 for final approval and recommendation to Council. The Forum's comments will be submitted to Cabinet for consideration.

## **Section 2 – Report**

### **BACKGROUND**

- 1.01 Harrow remains one of the lowest funded Councils both within London and nationally. The Council does not benefit from large reserves compared with the rest of London and is in the lower end of the lower quartile for reserve balances held.
- 1.02 Over the past 10 years, the Council's revenue support grant has reduced from £50.5m to £2m in 2023/24 and whilst the Council does receive other grant funding to support services, these grants are all ring fenced to areas of activity and cannot be used to support the core budget, for example the Dedicated Schools Grant of £143m. In 2023/24 these grants total £366m.
- 1.03 The Council does not receive specific funding to meet demographic growth and demand led pressures. In addition, inflation has increased substantially, creating unfunded budget pressures.
- 1.04 In previous years, Council Tax has been increased to just below referendum limits and full use has been made of the Adults Social Care Precept, both of which were in line with central government expectations. The impact of this is that the Council is heavily reliant on Council Tax to fund its core budget. In 2023/24 approximately 78% of the Council's net revenue budget of £196.3m is funded from Council Tax.

### **SUMMARY**

- 1.05 The draft budget set out in this report shows an updated MTFs to the figures agreed by Council in February 2023. After all adjustments, the budget for 2024/25 is balanced, but there remain budget gaps of £12.466m and £6.732m over the two years of MTFs for 2025/26 and 2026/27.
- 1.06 It is important to note that for 2025/26 and 2026/27, many of the budget adjustments are estimated at a high level due to the challenges of forecasting complex issues such as inflation, demand, and demographics so far in advance. As the budget is approved annually, the latter two years of the MTFs will be subject to substantive review and adjustment before finally being approved.

- 1.07 The draft MTFS is based on the announcements made as part of the 2023/24 Finance Settlement (which covered 2023/24 and 2024/25) and will be updated further once the detail of the 2024/25 Local Government Provisional Financial Settlement is known, which is expected to be announced on 19 December 2023. Estimates have been based on the most up to date information known at the time of setting the draft MTFS. It is likely this position will change following the indicative settlement. This change could be for the better or worse. The final settlement is expected to be agreed by the end of January 2024.

## **AUTUMN STATEMENT 2023**

- 1.08 The Chancellor of the Exchequer, Jeremy Hunt, delivered the 2023 Autumn Statement on 22nd November 2023. As well as the usual updates on the state of public finances and the performance of the economy, the Chancellor organised his policies into five key areas: reducing debt; cutting tax and rewarding hard work; backing British business; building domestic and sustainable energy; and delivering world-class education.
- 1.09 The key policy announcements relating to public spending and local government are summarised below:

### **Local Government Funding**

- There was no new funding for 2024-25 for adult or children's social care or any general local government funding, beyond what was announced last year.

### **Housing and Homelessness**

- Local Housing Allowance rates will be raised to a level covering 30% of local market rents.
- Additional funding of £120m for homelessness prevention (UK-wide) in 2024-25. The details of the allocations are not yet known and therefore the Harrow allocation is still to be confirmed.
- Local Authority Housing Fund to be extended with a third round worth £450m to deliver new housing units and temporary accommodation for Afghan refugees.
- For the Housing Revenue Account, there is a rate extension of £5m to June 2025 of the Public Works Loan Board policy margin announced in Spring 2023.
- There are plans to allow local authorities to be able to fully recover the cost of planning fees for major planning applications if decisions are made within certain timelines.
- Local Planning Authorities to receive £32m to tackle planning backlogs.

### **Business Rates**

- The standard business rate multiplier will be increased by September CPI (6.7%) and the small business rate multiplier will be frozen for a fourth consecutive year.
- The 75% Retail, Hospitality and Leisure relief will be extended for 2024-25.
- Local authorities will be fully compensated for the loss of income because of these two measures and will receive new burdens funding for administrative and IT costs.

#### **Local Government Pension Schemes**

- Reforms are anticipated to the Local Government Pension Scheme, including confirmation of guidance that will implement a 10% allocation ambition for investments in private equity, and establish a March 2025 deadline for the accelerated consolidation of LGPS assets into pools.

#### **National Living Wage and Benefits**

- From April 2024, the National Living Wage will increase by 9.8% to £11.44 an hour and the age threshold lowered from 23 to 21 years old.
- The triple-lock for pensions will be continued (an increase of 8.5%) and benefits will increase in line with the September CPI (6.7%).

- 1.10 There have been no changes made to the MTFs as a result of the Autumn Statement as the detail of any funding changes for 2024/25 will be included in the Financial Settlement for Local Government, which is due around the 19 December 2023, as indicated above.

### **DELIVERY OF THE 2023/24 BUDGET**

- 1.11 Harrow has had a good track record of robust financial management and has not reported a revenue budget overspend for many years. The budget for 2022/23 was originally based on drawing down £14.7m of reserves to bring in a balanced position. The final position for 2022/23 improved significantly as a result of careful control and oversight of budgets, which meant that only £5.8m of reserves were needed (as opposed to £14.7m) to bring the budget into a balanced position.
- 1.12 Performance against the current 2023/24 revenue budget is detailed in a separate report on this agenda, 'Revenue and Capital Budget Monitoring Report 2023-24 Q2'. This report forecasts a net overspend of £1.379m as at 30<sup>th</sup> September 2023. If the position does not improve before year end it would be necessary to draw down this amount from the MTFs Budget Planning Reserve to bring in a balanced position, but it is anticipated that 2023/24 can be balanced with no draw down from reserves other than those already built into the budget.
- 1.13 In line with the national picture, the Council is being heavily impacted by inflation. Budget provision for pay inflation was £4m (4%). The 2023/24 pay

award has recently been announced and it equated to an increase of 7% against the pay bill and has creating a budget pressure of £3.2m. The bulk of this pressure has been funded from the general corporate budget and the non-pay inflation provision, but still leaves an £800k shortfall to be carried forward into 2024/25.

- 1.14 In addition, there are very substantial pressures on demand in adult services. Such is the scale of the demand, that across the 3 years of the MTFS from 2024/25 to 2026/27, a further £9.7m has been added in as a budget growth, as set out in Table 1.

## **BUDGET PROCESS 2024/25**

- 1.15 The Council has a statutory obligation to agree and publish the budget for 2024/25, and approval for this will be sought in February 2024. In preparing the 2024/25 budget and rolling forward the MTFS to cover the three-year period to 2026/27, the current MTFS has been the starting point for the process.
- 1.16 The Council's financial position and its operational environment has always been affected by several financial uncertainties and adjustments that impact upon its financial position over the short and medium term. In preparing the draft budget for 2024/25 the existing MTFS has been:
- Refreshed and rolled on a year into 2026/27
  - Updated to reflect the demand pressures as well as any opportunities and savings, plus council tax changes.
- 1.17 The adjustments are summarised in Table 1 below. Following Table 1 there is an explanation for the figures contained within the table. These adjustments are also set out in Appendix 2 along with adjustments included within the previous MTFS agreed as part of the 2023/24 Budget process. Table 1 shows budget gaps of £0m for 2024/25, £12.466m for 2025/26 and £6.732m for 2026/27.

Table 1: Changes to the MTFs (Prior to Indicative Settlement)			
	2024/25	2025/26	2026/27
	£'000	£'000	£'000
<b>Budget Gap (February 2023)</b>	<b>0</b>	<b>6,321</b>	<b>0</b>
Reversal out of Social Care Grant		6,822	
<b>Budget Gap (February 2023)</b>	<b>0</b>	<b>13,143</b>	<b>0</b>
<b>Council Tax Changes</b>			
Core CT @2.99%			-4,995
Increase 2024/25 by 1 % to 4.99%	-1,545		
Residual Tax Base Increase for 2024/25	-21		
Increase in CT base - 150 band D equivalents		-312	-250
Council Tax Collection Fund Surplus (one off)	-790	790	
<b>Grants and Technical Adjustments</b>			
Council Wide Growth			1,000
One off reduction of contingency	-175	175	
Assume Social Care Grant will remain with LA		-6822	
Assume that Capital Flexibilities will be extended on one off basis		-1250	1,250
Assume temporary savings on capital financing cost from slippage (one off)	-3000	3,000	
Reverse Council wide Mgt saving	650		
Increase TM savings to offset Mgt saving - additional investment income being achieved through improved investment returns	-650		
West London Waste Authority energy income (electricity)	-1000		1000
<b>Capital Programme Review</b>			
Resources - reduction of £600k in the Capital Programme. Therefore reducing capital financing cost in the revenue budget.	-34	92	-196
Place - reduction of £1.964m in the Capital Programme. Therefore reducing capital financing costs in the revenue budget.	-148		
2026/27 Capital Programme Cost			1,500
<b>Pay award 2023/24</b>			
£6.4m budget available. pay award £7.2m. Gap for 2023/24 pay award of £800k.	800		
Reduction of council wide growth 2024/25 to fund pay award	-755		
<b>Pay award 2024/25</b>			
£5.5m provision for pay and £1.0m for non pay - already assumed in the previous 2023/24 budget setting.			
<b>Pay award 2025/26</b>			
£5m provision for pay and £1m for non pay - already assumed in the previous 2023/24 budget setting.			
<b>Pay award 2026/27</b>			
Pay award @ 3%			3000
<b>Provision for Non Pay Inflation</b>			
Non Pay inflation provided for £1m in line with previous provisions.			1000
<b>Directorate Pressures plus Mitigations</b>			
<b>Resources and Managing Director</b>			
Resources - Access Harrow saving was not progressed as a result of a decision to keep the phone lines open for residents accessing the Revenues and Benefits service	180		
Managing Director (Finance and Assurance) - increase in external audit fees	250		
Managing Director (Finance and Assurance) - internal audit & CAFT	260		
Resources - one off budget for payroll staff ( staff previously working on schools payroll retained to work on general payroll)	230	-230	
Discretionary Freedom Pass - reversal of saving	12	6	
<b>People's Directorate</b>			
<b>Adults</b>			
Adults demand pressures (£9.787m over 3 years)	5440	2347	2000
Additional award of Market Sustainability and Improvement Fund (MSIF) grant for adults.	-828		
MSIF grant assumed as permanent grant but add to adults base for 2025/26		828	
Care Provider Inflation for Social care - in line with prior year allocations			1800
<b>Children's</b>			
Children's Placements & Accommodation budget - reduction of growth provided for placements in previous years - in 2023/24 £4.35m was provided and £1m of this is now being reversed.	-1000		
Growth in Education for staffing re: statutory duties	100		
<b>Place</b>			
Parking PCN 23/24 income shortfall - rephase £1m saving into 2025/26	1,000	-1000	
Parking P&D income shortfall	360		
Planning & Building Control income (£116k attributable to MTFs savings)	341		
Potential Homelessness demand pressure		2,325	
Housing staffing resource - one off requirement	180	-180	
Local Plan review	91	80	-171
Saving to reduce waste disposal costs through behavioural change (residents)			
Rephasing of £0.5m saving over 2 years	250	-250	
Additional Street Cleaning funding	250		
Local Plan Review -reversal of growth provided in 2024/25 and 2025/26			-206
Savings put forward in Appendix 1A	-448	-276	
<b>Revised Budget Gap after Risks and Opportunities</b>	<b>0</b>	<b>12,466</b>	<b>6,732</b>

## Council Tax and NNDR Changes

- 1.18 In 2023/24, despite an increase in Council tax of 4.99% which raised additional revenue of £7.8m (Council tax income increased from £146.2m to £154.0m), the cost of the 2023/24 pay award (only agreed in October 2023) is £7.2m and therefore, this left very little funding available for other demand pressures that have emerged in adult services and other inflationary pressures.
- 1.19 The assumed Council tax levels built into the MTFs agreed in February 2023 were based on 3.99% for 2023/24 and 2.99% for 2025/26. The changes made in Table 1 reflect an assumed Council tax of 2.99% in 2026/27 and an additional 1% assumed for 2024/25 which would take the increase from 3.99% to 4.99% for 2024/25. There is no change to the assumed 2.99% for 2025/26. This therefore provides for Council tax increases of 4.99%, 2.99% and 2.99% for the 3-year period 2024/25 to 2026/27.
- 1.20 In Table 1, the additional 1% in 2024/25 achieves additional income of £1.545m, whilst the original 3.99% achieves income of £6.144m. Therefore, the total council tax to be achieved from the 4.99% increase is £7.689m. The addition of 2.99% in 2026/27 provides £4.995m of council tax income in 2026/27.

In addition, the Council's tax base has been calculated, (according to the relevant procedures and guidance) at 89,375 band D equivalent properties, which is an increase of 290 Band D equivalents on the 2023/24 Band D of 89,085. This will generate additional income of £0.521m in 2024/25. Because £0.5m had already been included in the 2024/25 assumptions when the MTFs was set last year in Feb 2023, Table 1 only includes a further £21k. There are further tax base increases assumed for 2025/26 and 2026/27 and included in Table 1, which will be revisited as part of the 2025/26 budget process.

- 1.21 A maximum Council Tax increase of 4.99% is budgeted for 2024/25 in line with announcements made as part of the 2023/24 Finance settlement in December 2022. There is uncertainty as to whether the 2024/25 settlement will provide guidance as to the maximum level of Council Tax increase for 2025/26 and 2026/27 and for this reason, the working assumption has been left at 2.99% for both of these years.
- 1.22 The Autumn Statement 2023 is clear that the small business rates multiplier will be frozen in 2024/25 and local authorities will be fully compensated for any loss of income at the September CPI level of 6.7%. Freezing the multiplier means businesses will not see an increase in their bills and the Council will be compensated for this loss of inflationary income through the NNDR Multiplier Grant. However, due to revaluation losses in NNDR, there is no assumed increase in NNDR built into the budget for 2024/25 and this will be revisited following the announcement of the 2024/25 Finance settlement. Rateable value generally reduces annually in Harrow, this being a trend that has existed locally for several years.

- 1.23 The Collection Fund and its impact on the 2024/25 budget is subject to a separate report elsewhere on this agenda (Report: Estimated Surplus/(Deficit) on the Collection Fund 2023/24). The estimated impact on the 2023/24 Collection Fund is a surplus of £0.790m which must be accounted for as a one-off income against the 2024/25 budget and is included in Table 1.

### **Technical Changes**

- 1.24 A number of other adjustments have been included in Table 1 which are explained as follows:
- £1m of council wide growth in 2026/27 – this is a general allowance for growth as, other than for adults, there is no other departmental growth included.
  - £175k one off reduction of the contingency budget to balance the 2024/25 budget whilst awaiting the 2024/25 Finance settlement which could bring in some other opportunities to balance the budget.
  - In 2023/24, £6.822m of social care funding was awarded for 2 years and initially it was felt that it was possible that the grant might have to be used in 2025/26 for Social Care reform. Therefore, in arriving at the original budget gap of £13.143m in 2025/26, it had been assumed that the grant would be removed, resulting in an increase of the gap from £6.321m to £13.143m. It is now widely assumed that this grant will not be removed and therefore Table 1 reverses that assumption which improves the 2024/25 position by £6.822m.
  - Capital Flexibilities are assumed for a further year in 2025/26 which enables the Council to charge transformation costs to capital and thereby reduce the cost to the revenue budget. £1.25m is assumed for 2025/26 as a one-off basis.
  - Capital financing savings of £3m are assumed on a one-off basis as a result of slippage expected in the capital programme based on past experience.
  - Treasury Management savings of £650k are assumed in 2024/25 which will offset a previous saving not achieved in overall Management savings.
  - The Council has received some cash rebates from West London Waste Authority of £1.6m and £2.4m respectively in 2022/23 and 2023/24 as a result of energy income. The energy from waste facility generates electricity which then generates an income for the WLWA. A decision was made to reimburse a proportion of the energy income to the six constituent boroughs. Therefore, the budget assumes £1m for a further 2 years but then this is reversed out in 2026/27, since it cannot be assumed to continue indefinitely.
  - As a result of a review of the existing Capital Programme, it has been possible to remove some surplus capital budgets and therefore reducing capital financing costs by a net £286k across the MTFs period (-£182k 2024/25, £92k 2025/26 and -£196k 2026/27).



- The cost of the 2023/24 Capital Programme was approved as part of the 2023/24 budget setting process, but as the cost of £1.5m fell into 2026/27 which was last year outside of the MTFs period, the cost of £1.5m is now included.
- The pay award for 2023/24 has recently been agreed and cost £7.2m, an approximate 7% uplift against the pay bill. The 2023/24 budget included a provision of £4m and there were other budgets (non-pay inflation and corporate budgets) of £2.4m available to fund the pay award, which leaves an £800k shortfall that need to be built into the 2024/25 budget. To offset the pressure, a corporate growth budget of £755k is being reduced to fund it.
- In terms of 2024/25, 2025/26 and 2026/27, pay award budgets have been assumed of £5.5m, £5m and £3m respectively. Over the past few years, the pay awards have been agreed very late in the financial year and for both 2022/23 and 2023/24, the pay agreements have been reached around October time which makes it very difficult for budgeting purposes.
- Non pay inflation, which covers areas such as energy costs and contractual up lifts, is set at £1m pa in 2024/25 and 2025/26 and is increased by a further £1m for 2026/27.

### **Directorate Pressures/Savings**

1.25 The rest of the figures in Table 1 relate to Directorate pressures in the main, with a small number of savings which are detailed in Appendix 1A. As can be seen from Table 3 and Appendix 1A, there is growth of £6.7m, £3.6m and £1.6m built into the MTFs across the 3 years 2024/25 to 2026/27, which total £11.9m. Growth in the Adult social care budget accounts for £9.8m of the net growth.

1.26 After all the adjustments, the result is an estimated gap across the MTFs of £19.198m as follows:

2024/25 £0m  
 2025/26 £12.466m  
 2026/27 £6.732m

1.27 Between now and the Final Budget in February 2024, and further in 2024, the next steps are:

- Clarify the implications on the MTFs of the Indicative Financial Settlement when received in late December
- Continue to review/refine pressures, to reduce the impact of the gap in future years of 2025/26 and 2026/27.  
 Focus on efficiencies to reduce the impact of the gap in future years of the MTFs.

## Growth & Savings

- 1.28 Table 2 below summarises the savings and growth previously agreed as part of the 2023/24 budget process. This shows that there are net savings of £7.791m in 2024/25 and £1.209m in 2025/26. Therefore, total savings of £9.0m across the 2 years.

**Table 2: Savings and Growth from the 2023/24 Budget Process  
(Detail in Appendix 1B)**

	2024-25	2025-26	Total
	£000	£000	£000
<b>Savings</b>			
Resources	(708)	(108)	(816)
Managing Director	(499)	(6)	(505)
Place	(3,775)	(300)	(4,075)
Adults	(1,989)	(295)	(2,284)
Childrens	(1,570)	(500)	(2,070)
Corporate/Council Wide			-
<b>Total Savings</b>	<b>(8,541)</b>	<b>(1,209)</b>	<b>(9,750)</b>
<b>Growth</b>			
Childrens	500	-	500
Corporate	250	-	250
<b>Total Growth</b>	<b>750</b>	<b>-</b>	<b>750</b>
<b>Net Total Savings and Growth</b>	<b>(7,791)</b>	<b>(1,209)</b>	<b>(9,000)</b>

- 1.29 Table 3 summarises “new” growth and savings from the current 2024/25 budget setting process. This shows that there is net growth of £6.668m in 2024/25, £3.65m in 2025/26 and £1.623m in 2026/27. Therefore, this is net growth across the 3 years of £11.941m.

**Table 3: Savings and Growth from the 2024/25 Budget Process  
(Detail is set out in Appendix 1A)**

	2024-25	2025-26	2026-27	Total
	£000	£000	£000	£000
<b>Savings</b>				-
Place	(448)	(276)	-	(724)
<b>Total Savings</b>	<b>(448)</b>	<b>(276)</b>	<b>-</b>	<b>(724)</b>
<b>Growth</b>				
Resources	410	(230)	-	180
Managing Director	522	6	-	528
Place	2,472	975	(377)	3,070
Adults	4,612	3,175	2,000	9,787
Childrens	(900)	-	-	(900)
<b>Total Growth</b>	<b>7,116</b>	<b>3,926</b>	<b>1,623</b>	<b>12,665</b>
<b>Net Total Savings and Growth</b>	<b>6,668</b>	<b>3,650</b>	<b>1,623</b>	<b>11,941</b>

The summary information in the tables is supported by the details in appendices 1A and 1B.

## **CAPITAL RECEIPTS FLEXIBILITY**

- 1.30 In 2016 the government announced the Capital Receipts Flexibility Scheme to support local authorities to deliver more efficient and sustainable services by allowing them to spend up to 100% of their fixed assets receipts on the revenue costs of transformation projects. The flexibility has been extended on numerous occasions and is currently in place until 31 March 2025 but is likely to be extended and will be confirmed in the 19 December Finance settlement.
- 1.31 As part of the 2023/24 Budget process, the use of capital flexibilities was in place for 2023/24 and 2024/25 and then being reversed out in 2025/26. Table 1 assumes a continuation for a further year into 2025/26 but then is discontinued and the budget is reinstated for 2026/27. The MTFs includes a budget of £1.250m to fund the Regeneration Team. The nature of this spend meets the capital flexibility criteria and the team will be funded under the capital flexibilities scheme. The £1.250m provision is re-instated in 2026/27.

## **PUBLIC HEALTH FUNDING 2024/25**

- 1.32 In 2023/24 the total public health grant to local authorities totalled £3.529bn, with £12.007m being allocated to Harrow. The grant is ringfenced for use on public health functions exclusively for all ages of the population and must be spent in accordance with grant conditions on expenditure incurred by local authorities for the purposes of their public health functions, as specified in Section 73B (2) of the National Health Service Act 2006.
- 1.33 The draft Public Health commissioning intentions detailed in Appendix 3 are based on the indicative grant allocation for 2024-25 of £12.165m as advised by DHSC in March 2023 and indicate a 1.3% uplift, taking the total national funding for 2024-25 to £3.575bn. These commissioning intentions reflect alignment with the Health & Wellbeing Strategy, Borough Plan, and evidence of population priorities.
- 1.34 The Council consider that this level of funding enables the Council's overarching statutory duties (including equality duties) to be maintained, taking account of the joint strategic needs assessment. However, if additional duties are required by Councils, and if these were unfunded, the commissioning intentions would need to be reviewed in light of the allocated grant envelope.

## **SCHOOLS FUNDING FOR 2024/25**

- 1.35 In 2018/19 the government introduced a new National Funding Formula (NFF) for Schools, High Needs and the Central Schools services Block. For the Schools Block this means LAs are funded based on the total of the NFF for all schools, academies, and free schools in its area. However, the final formula for distribution is determined by each Council following consultation with schools and Schools Forums.

- 1.36 The LA carried out a consultation in Autumn 2017 which sought views on whether the LA should continue to use the Harrow Schools Funding Formula or introduce the National Funding Formula from 2018/19. 76% of schools responded to the consultation and 89% voted in favour of introducing the NFF from 2018/19. This was approved by Cabinet in February 2018 and school budgets for the last three years have been set based on the NFF.
- 1.37 The NFF will therefore continue to be used to distributed school budgets for 2024/25. There are no proposed changes to the structure of the formula for 2024/25 as detailed in Appendix 4. The proposed final funding formula and final DSG allocations will be reported to Cabinet in February 2024 for approval.

### **BETTER CARE FUND (BCF) 2024/25**

- 1.38 The framework for the Better Care Fund (BCF) derives from the government's mandate to the NHS which sets an objective for NHS England to ring fence funding to form the NHS contribution to the BCF. The NHS Long Term Plan, published in January 2019 set out the priorities for transformation and integration, including plans for investment in integrated community services and next steps to develop Integrated Care Systems.
- 1.39 The BCF continues to provide a mechanism for personalised, integrated approaches to health and care that support people to remain independent at home or to return to independence after a period in hospital. The continuation of the national conditions and requirements of the BCF provides opportunities for health and care partners to build on their plans to embed joint working and integrated care further, including how to work collaboratively to bring together funding streams to maximise the impact on outcomes for communities and sustaining vital community provision.
- 1.40 Following submission of the planning template covering the period 2023-2025 in August 2023, and assurance by NHS England, the 2024/25 Adults budget assumes that funding for the Protection of Social Care through the BCF will be £7.954m – an increase of 5.66% on the funding for 2023-24, reflecting the NHS funding commitments made within the spending review.
- 1.41 The total value of the Better Care Fund in Harrow for 2024-25 is £31.406m and includes a range of grants (including the Disabled Facilities and Adults Discharge Grants) and schemes across both Health and Social Care. The Better Care Fund Policy statement and Policy Framework and Planning Requirements will provide the detailed guidance when published in early 2024 (usually March). The requirements around integration and collaborative working are expected to continue.

### **RESERVES AND CONTINGENCIES**

- 1.42 Reserves and contingencies need to be considered in the context of their role to protect the Council's financial standing and in the context of the overall risks that the Council faces during a continuing period of economic uncertainty. The MTFs reflects the Council's need to ensure an adequate level of reserves and contingencies which will enable it to manage the risks

associated with delivery of the budget including equalities impacts and unforeseen events.

- 1.43 The Council's overall reserves position is reported to Cabinet quarterly as part of the revenue monitoring update. At quarter 2 (end of September 2023), total reserves forecast for carry forward into 2024/25 are £58.4m, this includes a deficit reserve on the DSG of £2.6m, therefore the gross value of reserves is £61.0m (as reported in Table 10 of the Q2 revenue and capital monitoring report, elsewhere on the agenda).
- 1.44 If the forecast in year overspend position does not change and requires a draw down from reserves in the region of £1.4m, this would reduce reserves further to £59.6m. However, on the basis of the £61.0m gross position and after accounting for specific earmarked reserves of £25.1m, this leaves the Councils remaining reserves at £35.9m as summarised at high level below:

• Total reserves earmarked (non-specific)	£9.8m
• Budget Planning Reserve	£16.1m
• General Fund balances	£10.0m
<b>Total</b>	<b>£35.9m</b>

- 1.45 At the end of the financial year, all reserves are reviewed including a focus on ear marked reserves to ensure they are still required for the purpose to which they are designated. The Interim Director of Finance and Assurance will report on the adequacy of the Council's reserves as required in the budget setting report in February 2024.
- 1.46 In addition to reserves there is an annual budgeted Contingency for Unforeseen items of £1.248m which sits within the Corporate budgets. As part of the budget setting for 2024/25 a one off use has been factored into the budget which reduces the figure by £175k for 2024/25 but it is reinstated at £1.248m for 2025/26 onwards.

## **LONDON BOROUGH GRANTS SCHEME**

- 1.47 Harrow's contribution to the London Borough Grant Scheme was £186,907 in 2023/24. At the time of writing this report, the Council has not been notified of the recommended contribution for 2024/25. To ensure that the Council can respond to London Councils when contribution rates are notified, it is recommended that Cabinet authorise the interim Director of Finance & Assurance to agree Harrow's 2024/25 contribution to the London Borough Grant Scheme, in consultation with the Portfolio Holder for Finance and Human Resources. The contribution for 2024/25 will be reported to Cabinet in February 2024 as part of the final budget.

## 2.0 CONSULTATION

2.1 As a matter of public law the duty to consult with regards to proposals to vary, reduce or withdraw services will arise in four circumstances:

- Where there is a statutory requirement in the relevant legislative framework.
- Where the practice has been to consult or where a policy document states the council will consult then the council must comply with its own practice or policy.
- Exceptionally, where the matter is so important that there is a legitimate expectation of consultation and.
- Where consultation is required to complete an equalities impact assessment.

2.2 Regardless of whether the council has a duty to consult, if it chooses to consult, such consultation must be carried out fairly. In general, a consultation can only be considered as proper consultation if:

- Comments are genuinely invited at the formative stage.
- The consultation documents include sufficient reasons for the proposal to allow those being consulted to be properly informed and to give an informed response.
- There is adequate time given to the consultees to consider the proposals;
- There is a mechanism for feeding back the comments and those comments are conscientiously taken into account by the decision maker / decision making body when making a final decision;
- The degree of specificity with which, in fairness, the public authority should conduct its consultation exercise may be influenced by the identity of those whom it is consulting and;
- The consultation is clear on the reasons and extent to which alternatives and discarded options have been considered.

2.3 Public consultation on the overall budget for 2024/25 will commence on 20 December 2023 and will last for a period of 5 weeks ending 24 January 2024 before the final budget is approved by Cabinet on 15 February and then recommended to Full Council on the 22 February 2024. The public consultation will give residents an opportunity to comment on the 2024/25 overall budget before final decisions are formalised in the council's annual budget. Other key stakeholders, including Union Representatives, local businesses, employees, and the Council Scrutiny function will also be fully consulted in the draft budget and MTFs before final approval. Once the consultation has closed then the cumulative equality impact assessment on the budget can be completed.

2.4 In terms of service specific consultations, the council has a duty to consult with residents and service users in several different situations including where proposals to significantly vary, reduce or withdraw services. Consultation is also needed in other circumstances, for example to identify the impact of proposals or to assist with complying with the council's equality duties. Council sets the budget envelope and Cabinet works within this.

Where appropriate, separate service specific consultations will take place for the 2024/25 savings and may be subject to a separate Cabinet report and Cabinet decisions as necessary.

- 2.5 Within Appendix 1A, there is a saving that is being reversed following separate consultation which concluded in October 2023. The saving of £6k per annum for each of the 3 years of the MTFS, was to be made by the cessation of Discretionary Freedom passes for new applicants. Having considered the feedback from the consultation, the Portfolio holder for Finance and Human Resources has decided not to implement the change and therefore the saving is reversed out of the budget.

### 3.0 PERFORMANCE ISSUES

- 3.1 In terms of financial performance, Cabinet is updated quarterly on forecast spend against the agreed budget and achievement of savings built into the budget. The same information is also presented to the Performance and Finance Scrutiny Sub Committee regularly throughout the year.

### 4.0 RISK MANAGEMENT IMPLICATIONS

- 4.1 Risks included on corporate or directorate risk register? Yes – Inability to deliver the Council’s MTFS is included in the Corporate Risk Register

Separate risk register in place? No

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

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

Risk Description	Mitigations	RAG Status
Inability to deliver the Council’s approved MTFS - over the next 3 years leading to an inability to set a balanced budget and provide core services	<ul style="list-style-type: none"> <li>• In-year Revenue &amp; Capital monitoring reported to CLT monthly, as well as the Portfolio Holder for Finance and HR, and Cabinet on a quarterly basis.</li> <li>• Budget challenge sessions held to tackle in year pressures in August and Sept 2023.</li> <li>• Savings are tracked on a monthly basis via the MTFS savings tracker</li> <li>• Budget for 2024/25 is balanced so the focus for attention is the 2025/26 and 2026/27 budget gaps.</li> </ul>	<b>RED</b>

<p>The draft budget and MTFS is based on the 2023/24 Financial Settlement, which was received in December 2022. The 2024/25 Finance settlement will not be announced until 19 December 2023, so there is still uncertainty in many of the numbers.</p>	<ul style="list-style-type: none"> <li>• Draft budget and MTFS based on most up to date information from London Councils and DHLUC based on prudent assumptions</li> <li>• The final budget will be prepared considering the Final Settlement. Any changes will have to comply with the legal requirement to set a balanced budget.</li> <li>• There is a contingency for unforeseen items (£1.248m) which is intended to support uncertainty</li> </ul>	<p><b>AMBER</b></p>
<p>Balanced budget for 2023/24 not achieved adversely impacting on the 2024/25 budget</p>	<ul style="list-style-type: none"> <li>• The 'Q2 Revenue and Capital Report' forecasts a net overspend of £1.4m. It is anticipated that this should reduce by year end as forecasts build in anticipated spend which may not happen.</li> <li>• The estimated impact of 2023/24 pressures into 2024/25 are accounted for in the draft budget and MTFS</li> <li>• There is a contingency for unforeseen items (£1.248m) which has not been called upon.</li> </ul>	<p><b>AMBER</b></p>

## 5.0 LEGAL IMPLICATIONS

- 5.1 Section 31A of the Local Government Finance Act 1992 requires billing authorities to calculate their council tax requirements in accordance with the prescribed requirements of that section. This requires consideration of the authority's estimated revenue expenditure for the year to perform its functions, allowances for contingencies in accordance with proper practices, financial reserves and amounts required to be transferred from general fund to collection fund.
- 5.2 Local authorities owe a fiduciary duty to council taxpayers, which means they must consider the prudent use of resources, including control of expenditure, financial prudence in the short and long term, the need to strike a fair balance between the interests of council taxpayers and ratepayers and the community's interest in adequate and efficient services and the need to act in good faith in relation to compliance with statutory duties and exercising statutory powers.
- 5.3 Cabinet is approving these proposals for consultation after which a cumulative equalities impact will be drafted. These proposals will be referred to Council so that Council can approve the budget envelope and set the Council Tax. There will be contingencies within the budget envelope so that



decision makers have some flexibility should any decisions have detrimental equalities impacts that cannot be mitigated.

Section 151 of the Local Government Act 1972 states that: “without prejudice to section 111, every local authority shall make arrangements for the proper administration of their financial affairs and shall secure that one of their officers has responsibility for the administration of those affairs”. Section 111 of the Local Government Act 1972 relates to the subsidiary powers of local authorities.

Under Section 114 of the Local Government Finance Act 1988, the chief finance officer (S151 Officer) of a relevant authority shall make a report under this section if it appears to them that the expenditure of the authority incurred (including expenditure it proposes to incur) in a financial year is likely to exceed the resources (including sums borrowed) available to it to meet that expenditure.

## **6.0 FINANCIAL IMPLICATIONS**

6.1 Financial Implications are integral to this report.

## **7.0 PROCUREMENT IMPLICATIONS**

7.1 There are no procurement implications arising from this report.

## **8.0 EQUALITIES IMPLICATIONS / PUBLIC SECTOR EQUALITY DUTY**

8.1 Decision makers should have due regard to the public sector equality duty in making their decisions. The equalities duties are continuing duties, they are not duties to secure a particular outcome. The equalities impact will be revisited on each of the proposals as they are developed. Consideration of the duties should precede the decision. It is important that Cabinet has regard to the statutory grounds in the light of all available material such as consultation responses. The statutory grounds of the public sector equality duty are found at section 149 of the Equality Act 2010 and are as follows:

*A public authority must, in the exercise of its functions, have due regard to the need to:*

- (a) eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act;*
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
- (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.*

*Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard to the need to:*

- (d) *remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;*
- (e) *take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;*
- (f) *Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.*  
*The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include steps to take account of disabled persons' disabilities.*

Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard; in particular, to the need to:

- (a) *Tackle prejudice, and*
- (b) *Promote understanding.*

*Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.*

*The relevant protected characteristics are:*

- *Age*
- *Disability*
- *Gender reassignment*
- *Pregnancy and maternity*
- *Race*
- *Religion or belief*
- *Sex*
- *Sexual orientation*
- *Marriage and Civil partnership*

- 8.2 Directorate proposals will be subject to an initial equalities impact assessment followed by a full assessment where appropriate. These will be published along with the final budget and MTFS report to February Cabinet. An assessment will also be carried out on the whole budget which will include any relevant information from the budget consultation, when all proposals have been identified, to ensure that decision makers are aware of any overall equalities impact on the protected characteristics listed above.

## **Council Priorities**

The Council's draft budget and MTFS for 2024/25 has been prepared in line with the Council's priorities:

1. A council that puts residents first
2. A borough that is clean and safe
3. A place where those in need are supported.

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

**Statutory Officer: Sharon Daniels**

Signed by the Chief Financial Officer

**Date: 27/11/2023**

**Statutory Officer: Jessica Farmer**

Signed by the Monitoring Officer

**Date: 07/12/2023**

**Chief Officer: Sharon Daniels**

Signed off on behalf of the Managing Director

**Date: 27/11/2023**

**Head of Procurement: Nimesh Mehta**

Signed by the Head of Procurement

**Date: 27/11/2023**

**Head of Internal Audit:**

Signed on behalf of the Head of Internal Audit

**Date: 27/11/2023**

## **Mandatory Checks**

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

**EqlA carried out: NO – to be reported as part of the February 2024 final budget report**

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

### **Papers**

**Contact:** Sharon Daniels – Interim Director of Finance & Assurance.  
Sharon.Daniels@harrow.gov.uk

**Background Papers: NONE**

**Call-in waived by the Chair of Overview and Scrutiny Committee: No**

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Appendix 1A B1 Proposed savings/growth proposals - budget process 2024-25

ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals				EIA required Y/N?	Does this proposal impact on another directorate? Y/N	Further consultation with Key Stakeholders Yes/No/N/A
			2024-25	2025-26	2026-27	Total			
			£000	£000	£000	£000			
		<b>Savings Proposals</b>							
		<b>PLACE</b>							
PLACE 2024-25_S01	Community Engagement	<b>Removal of Ward Priority Fund budget</b> Ward Priority Fund (WPF) is an annual fund, allocated across the borough, available to support small-scale ward-level projects or initiatives that have community and councillor support. The fund is apportioned equally between Wards, with each Ward receiving £4,545, for Ward Members to apply. With the removal of WPF, ward members can still deliver projects using other funding such as Neighbourhood Community Infrastructure Levy (NCIL)	(100)			(100)	N	N	No
PLACE 2024-25_S02	Corporate Estates	<b>Review of leases and rent for corporate property portfolio</b>	(50)			(50)	N	N	No
PLACE 2024-25_S03	Planning Service	<b>Introduction of new Fees and Charges for tree documents.</b> To supply and charge for environmental information relating to Tree Preservation Orders (TPOs).	(10)			(10)	N	N	No
PLACE 2024-25_S04	Planning Service	<b>Review of Technical Support resources and future requirements</b> following the full implementation of the new planning software system	(38)	(76)		(114)	Y	N	Yes, staff consultation
PLACE 2024-25_S05	Directorate wide	<b>Place Directorate Restructure 2023</b> Following the approval of the restructuring proposal, total saving is estimated to be in the region of £500k. £250k has already been included in 23/24 MTFs, therefore an additional saving of £250k can be generated.		(200)		(200)	Y	N	Yes, staff consultation
PLACE 2024-25_S06	Corporate Estates	<b>Net reduction in Business Rates</b> following the closure of Civic Centre and the opening of the Harrow Council Hub	(250)			(250)	N	N	No
		<b>PLACE SAVINGS PROPOSALS</b>	<b>(448)</b>	<b>(276)</b>	<b>-</b>	<b>(724)</b>			
		<b>TOTAL SAVINGS PROPOSALS</b>	<b>(448)</b>	<b>(276)</b>	<b>-</b>	<b>(724)</b>			

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Appendix 1A B1 Proposed savings/growth proposals - budget process 2024-25

ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals				EIA required Y/N?	Does this proposal impact on another directorate? Y/N	Further consultation with Key Stakeholders Yes/No/N/A
			2024-25	2025-26	2026-27	Total			
			£000	£000	£000	£000			
		<b>Growths Proposals</b>							
		<b>RESOURCES</b>							
RES1	Access Harrow	<b>Access Harrow</b> - Reversal of a previous saving relating to the closure of phone lines as the second part of the programme to reduce capacity within Revenues & Benefits was not progressed.	180			180			
RES2	Payroll Services	<b>Loss of income due to the cessation of schools payroll service.</b> Staff previously working on schools payroll service are retained to support the wider service. A one-off growth for 24/25 whilst efficiencies are being identified through the procurement of the Payroll system.	230	(230)		-			
		<b>RESOURCES GROWTH PROPOSALS</b>	410	(230)	-	180			
		<b>MANAGING DIRECTOR'S</b>				-			
MD1	Finance & Assurance	<b>Increase in External audit fees</b> as a result of procurement exercise by Public Sector Audit Appointments	250			250			
MD2	Finance & Assurance	<b>Rationalise the Discretionary Freedom Pass provision</b> - reversal of savings included in 23/24 MTFS. Following public consultation of the proposal, it was decided not to go ahead with this.	12	6		18			
MD3	Finance & Assurance	<b>Internal Audit &amp; Corporate Anit Audit Fraud Team</b> - Restructure to create sufficient capacity to delivery the service, following a review of current structure benchmarking exercise	260			260			
		<b>MANAGING DIRECTOR'S GROWTH PROPOSALS</b>	522	6	-	528			
		<b>PLACE</b>							
PLACE_2024-25_G01	Parking Services	<b>Parking Review</b> - Rephasing of the saving target in the MTFS (£1m) from 2024/25 to 2025/26	1,000	(1,000)		-			
PLACE_2024-25_G02	Parking Services	<b>Paid for Parking Income</b> - Income pressure for On Street and Car Park facilities across the borough	360			360			
PLACE_2024-25_G03	Planning Services	<b>Planning and Building Control application fees</b> Income pressures due to a reduction in application numbers	341			341			
PLACE_2024-25_G04	Clean & Green	<b>Street Cleaning</b> Additional investment to provide a more streamlined service and better ownership & accountability by the team.	250			250			

Appendix 1A B1 Proposed savings/growth proposals - budget process 2024-25

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ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals				EIA required Y/N?	Does this proposal impact on another directorate? Y/N	Further consultation with Key Stakeholders Yes/No/N/A
			2024-25	2025-26	2026-27	Total			
			£000	£000	£000	£000			
PLACE_2024-25_G05	Planning Services	<b>Local Plan Review</b> Additional support to the new Harrow Local Plan on Tall Buildings assessment, Views assessment, External Communications support an Kings Counsel representation at examination.	91	80	(171)	-			
PLACE_2024-25_G06	Planning Services	<b>Local Plan Review</b> Reversal of growth in 26/27 - budget provided in 2023/24 MTFS for 3 years only for additional staff resources required to complete Local Plan Review			(206)	(206)			
PLACE_2024-25_G07	Housing	<b>Homelessness demand pressures</b> - baseline pressure (assuming at current homelessness level) once the one-off grant reserve has been exhausted.		2,325		2,325			
PLACE_2024-25_G08	Housing	<b>Housing - Additional staff resource</b> to support additional work due to a considerable increase in the approaches and formal applications to the Housing Needs Services.	180	(180)		-			
PLACE_2024-25_G09	Waste Services	<b>Behavioural change (residents) for reducing waste disposal cost</b> - Original saving of £0.5m in 24/25. Rephasing of this over 2 years due to the delay in the recruitment of the recycling team. Communications plan and resident engagement to reduce waste and divert to recycling.	250	(250)		-			
		<b>PLACE GROWTH TOTAL</b>	<b>2,472</b>	<b>975</b>	<b>(377)</b>	<b>3,070</b>			
		<b>PEOPLE - ADULTS</b>							
ASC01	Placements	<b>Older Adults</b> - Increased budget for social care costs	1,955	2,000	2,000	5,955			
ASC02	Placements	<b>All Age Disabilities</b> - Increased budget for social care costs	2,920	-	-	2,920			
ASC03	Workforce	<b>All Age Disabilities</b> - Additional staffing requirements	77	-	-	77			
ASC04	Placements	<b>Community Equipment</b> - increased cost / volume for issues	115	-	-	115			
ASC05	Workforce	<b>Social Work Realignment</b> - to ensure consistency across Peoples in the grade costs for social work staff to support recruitment & retention	223	347	-	570			
ASC06	Workforce	<b>DoLS &amp; Safeguarding</b>	150	-	-	150			
ASC07	Placements	Assumed additional Market Sustainability Improvement Fund (MSIF) 2024/25	(828)			(828)			
ASC07	Placements	Permanent MSIF grant added to Adults base budget		828		828			
		<b>ADULTS GROWTH PROPOSALS</b>	<b>4,612</b>	<b>3,175</b>	<b>2,000</b>	<b>9,787</b>			

Appendix 1A B1 Proposed savings/growth proposals - budget process 2024-25

ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals				EIA required Y/N?	Does this proposal impact on another directorate? Y/N	Further consultation with Key Stakeholders Yes/No/N/A
			2024-25	2025-26	2026-27	Total			
			£000	£000	£000	£000			
		<b>PEOPLE - CHILDREN SERVICES</b>							
PCG01	Education Services	Education Services Staffing Proposals	100			100			
PCG02	CYPS	Reduction of PC01 2023-24 Growth for Children's Placements & Accommodation	(1,000)			(1,000)			
		<b>CHILDREN SERVICES GROWTH PROPOSALS</b>	<b>(900)</b>	<b>-</b>	<b>-</b>	<b>(900)</b>			
		<b>PEOPLE GROWTH TOTAL</b>	<b>3,712</b>	<b>3,175</b>	<b>2,000</b>	<b>8,887</b>			
		<b>TOTAL GROWTH</b>	<b>7,116</b>	<b>3,926</b>	<b>1,623</b>	<b>12,665</b>			
		<b>NET SAVINGS/GROWTH PROPOSALS</b>	<b>6,668</b>	<b>3,650</b>	<b>1,623</b>	<b>11,941</b>			



**Appendix 1B - Summary Savings and Growth from the 2022-23 & 2023-24 Budget Process**

	<b>2024-25</b>	<b>2025-26</b>	<b>Total</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
<b>Savings</b>			
Resources	(708)	(108)	<b>(816)</b>
Managing Director	(499)	(6)	<b>(505)</b>
Place	(3,775)	(300)	<b>(4,075)</b>
Adults	(1,989)	(295)	<b>(2,284)</b>
Childrens	(1,570)	(500)	<b>(2,070)</b>
Corporate/Council Wide			-
<b>Total Savings</b>	<b>(8,541)</b>	<b>(1,209)</b>	<b>(9,750)</b>
<b>Growth</b>			
Childrens	500	-	<b>500</b>
Corporate	250	-	<b>250</b>
<b>Total Growth</b>	<b>750</b>	-	<b>750</b>
<b>Net Total Savings and Growth</b>	<b>(7,791)</b>	<b>(1,209)</b>	<b>(9,000)</b>

Savings and growth proposals from the 2023-24 Budget Process

Appendix 1B

Item No	ref	Specific Service Area	Headline Description re: saving / reduction <b>INTERNAL</b>	Proposals			EIA required Y/N	Does this proposal impact on another directorate? Y/N	Further Consultation with Key Stakeholders Yes/No/N/A
				2024-25	2025-26	Total			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
				£000	£000	£000			
			<b>Savings Proposals</b>						
			<b>Resources</b>						
1	RES L1	BSS	Reduction of the cost of post through digitalisation	-	-	-	N	Y	No
2	RES L2	IT	<b>Integrated Apps</b> - IT is in the process of agreeing a new corporate approach to management of business systems which are currently managed within departments. This new approach is expected to result in rationalisation and centralisation of budgets and deliver savings through reduction in contract spend.	(200)	-	(200)	N	N	No
3	RES 9	IT	<b>IT Expenditure review and consolidation this is a back office saving which is not expected to have an impact on residents.</b>	(100)	-	(100)	N	N	No
4	RES 12	Resources	<b>Redesign of Resources Directorate</b> - An exercise to redesign the Resources Directorate is currently underway. Although this is being driven to make sure that the Directorate is fit for purpose for the ongoing needs of the Council, it is also important to consider that one of these needs is to address affordability. This will be subject to HR procedures and consultaion and an Equality Impact Assesment.	(408)	(108)	(516)	Y	Y	Yes
			<b>RESOURCES SAVINGS PROPOSALS</b>	<b>(708)</b>	<b>(108)</b>	<b>(816)</b>			
			<b>Managing Director's</b>			-			
5	CEO 10	Registration Services	<b>Land Charges</b> - this savings relates to transfer to Land Registry of local land charges register that records obligations affecting properties within their administrative area	(100)		(100)	N	N	No
6	CEO 4	Revs & Benefits	<b>The Inflation Negating Scheme</b> for Working Age Households in receipt of Council Tax Support at the end of 2022/23 will be replaced with a one off cost of living grant for 2023/24. Harrow has previously used its discretionary powers to administer a local inflation negating scheme to ensure that working age recipients of council tax support were awarded additional relief to cover the Harrow council tax inflationary increases.	(310)	-	(310)	Y	N	No
7	CEO 2	Revs & Bens	<b>Rationalise the Discretionary Freedom Pass provision</b> - Currently Discretionary Freedom passes are issued to approximately 200 residents. The scheme will continue for existing users but will not be offered to new applicants from 1.04.2023. Subject to cabinet report, consultation and Equality Impact Assesment.(EQIA)  <i>Note: Following public consultation in 2023, the proposal is not to go ahead. These savings are reversed by growth included in Appendix 1a of the budget report.</i>	(6)	(6)	(12)	Y	N	Yes
8	CEO 8	Governance	<b>Efficiencies in legal and Governance</b>	(20)		(20)	N	N	Yes
9	CEO 9	Registration Services	<b>Registry Office</b> - saving relates to review of service operating model and staffing levels. Subject to EQIA and consultaion with staff and residents if required.	(63)		(63)	Y	N	Yes
			<b>MANAGING DIRECTOR'S SAVINGS PROPOSALS</b>	<b>(499)</b>	<b>(6)</b>	<b>(505)</b>			

Item No	ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals			EIA required Y/N	Does this proposal impact on another directorate? Y/N	Further Consultation with Key Stakeholders Yes/No/N/A
				2024-25	2025-26	Total			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
				£000	£000	£000			
			<b>People</b>						
			<b>Adults</b>						
10	ASC02	ASC	Freezing senior post in Adult social care. Statutory Director of Adults Social Care (DASS) role to be held by Corporate Director Peoples for six months	88	-	88	N	N	No
11	ASC03	ASC	Management Review during 2023/24 (all M grades & above) . HR procedures will be followed with consultaion and eqia	(60)	-	(60)	Y	N	Yes
12	ASC04	ASC	Review Adult Social Care pathway during 2023/24 (all G grades) HR procedures will be followed with consultaion and eqia. Will be subject to a separate cabinet decision.	(302)	-	(302)	Y	N	Yes
13	ASC06	NRC's	Neighbourhood Resource Centre (NRC) reprofiling (Kenmore & Vaughan) to provide the most complex support	(800)	-	(800)	Y	N	Yes
14	ASC07	NRC's	Public Health wellbeing support model - short term funding (2 years) to support the changes to the new NRC operating model	-	100	100	Y	N	No
15	ASC08	NRC's	Harrow Alliance Community Model (New Bentley). External utilisation and management of New Bentley by the third sector following appropriate procurement exercise	(220)	-	(220)	Y	N	Yes
16	ASC10	Health Funding	Use of Better Care Fund to protect of Social Care Services (via Better Care Fund) - uncommitted resources and 2% annual uplift allocated against existing social care expenditure	(145)	(145)	(290)	N	N	Yes
17	ASC11	CYAD	Review out of borough post 18 residential placements and provide alternative accommodation within Harrow to enable relocation back in borough. Placements equality impacts will be considered on an individual basis.	(250)	(250)	(500)	Y	Y	Yes
18	ASC12	Inhouse Residential	De-register Bedford House (20 bedded CQC registered residential unit) to provide supported living accommodation for the most complex & challenging. Subject to a separate cabinet report and EQIA.	(300)	-	(300)	Y	N	Yes
			<b>ADULTS TOTAL</b>	<b>(1,989)</b>	<b>(295)</b>	<b>(2,284)</b>			
			<b>Childrens</b>			-			
19	PC01	CYPS	<b>Placements &amp; Accommodation</b> Increased demand management - reduction in the cost of placements through reducing demand and stepping down young people into more cost effective provision where it is safe to do so	(500)	(500)	(1,000)	Y	Y	No
20	PC02	CYPS	<b>Social Care Staffing</b> HR policies will be followed. Service redesign delivering increased preventative models of care to reduce demand on formal care services resulting in reduction of management posts. Suhect to separate cabinet report and EQIA. HR policies will be followed	(1,070)		(1,070)	Y	N	Yes
			<b>CHILDRENS SERVICES TOTAL</b>	<b>(1,570)</b>	<b>(500)</b>	<b>(2,070)</b>			
			<b>PEOPLE SAVINGS PROPOSALS</b>	<b>(3,559)</b>	<b>(795)</b>	<b>(4,354)</b>			

Item No	ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals			EIA required Y/N	Does this proposal impact on another directorate? Y/N	Further Consultation with Key Stakeholders Yes/No/N/A
				2024-25	2025-26	Total			
				(4)	(5)	(6)			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
				£000	£000	£000			
			<b>PLACE</b>						
21	PLACE_S01	THAM & Parking	<b>Transport Strategy:</b> <b>Parking Charge Notices - Proposed move from Band B to Band A</b> , subject to endorsement by London Councils, the Mayor of London, and the Secretary of State for Transport. Subject to a separate decision. There are currently Band A and Band B charges for PCNs. Some London boroughs have moved to Band A while some are still in Band B (Harrow being one of them). The proposal is to move to Band A in order to support better compliance of traffic management.	(1,500)		(1,500)	Y	N	Yes
22	PLACE_S02	THAM & Parking	<b>Transport Strategy:</b> <b>Moving Traffic Contraventions (MTC) Review</b> - review of all MTCs in the borough and evaluate if they meet transport needs. The introduction of schemes including school streets and other measures following consultation from early 2023 including increasing ANPR / CCTV cameras. Schemes will be subject to a separate decision making process and consultation and EQIA as required.	(500)		(500)	Y	N	Yes
23	PLACE_S03	Waste Services	<b>Behavioural change (residents) for reducing waste disposal cost.</b> - Increase recycling / food waste to flats - Waste minimisation To invest in a recycling team to engage with and support residents on waste reduction and increased recycling through behavioural change on how to deal with waste.	(500)		(500)	N	N	No
24	PLACE_S06	THAM & Parking	<b>Transport Strategy:</b> Electric vehicle charging points - Increase installation using government funding (DfT) and supplier's match fund; and charge for the spaces. Concession contract. subject to a separate decision making process. Savings assume £3k per annum per bay, and a total of 100 bays following full roll out	(150)	(150)	(300)	Y	N	Yes



Item No	ref	Specific Service Area	Headline Description re: saving / reduction <b>INTERNAL</b>	Proposals			EIA required Y/N	Does this proposal impact on another directorate? Y/N	Further Consultation with Key Stakeholders Yes/No/N/A
				2024-25	2025-26	Total			
				(4)	(5)	(6)			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
				<b>£000</b>	<b>£000</b>	<b>£000</b>			
28		Education	<b>Reduction in Special Needs Transport growth</b> Growth was previously provided at £750k for 23/24 and £750k for 24/25 Appendix 1B. However following a review the full growth is not required. After these reductions of £550k and £250k this leaves £200k in 23/24 and £500k in 24/25 of the original growth.	(250)		(250)			
						-			
			<b>PEOPLE GROWTH TOTAL</b>	<b>(250)</b>	<b>-</b>	<b>(250)</b>			
			<b>CORPORATE</b>						
29	Corporate	Corporate	Inflationary Growth in relation to care provider inflation	250		250			
						-			
			<b>TOTAL CORPORATE GROWTH PROPOSALS</b>	<b>250</b>	<b>-</b>	<b>250</b>			
			<b>TOTAL GROWTH</b>	<b>-</b>	<b>-</b>	<b>-</b>			
			<b>NET SAVINGS/GROWTH PROPOSALS</b>	<b>(8,541)</b>	<b>(1,209)</b>	<b>(9,750)</b>			

Item No	ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals			EIA required Y/N	Does this proposal impact on another directorate? Y/N	Further Consultation with Key Stakeholders Yes/No/N/A
				2024-25	2025-26	Total			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
				£000	£000	£000			
<b><u>Savings and growth proposals from the 2022-23 Budget Process</u></b>									
			<b>Growths Proposals</b>						
			<b>People-Childrens</b>						
30		Education	Special Educational Needs Transport - . There are over 1,800 children and young people with Education Health & Care Plans (EHCPs) and approximately 40% of these are accessing SEN Transport. It is anticipated that the number of children and young people with EHCPs will increase to over 2,000 by 2023 which on the same ratio could mean a further 80 to 100 children requiring transport by 2023. It is estimated a further £750k pa will be required for each of the 3 years of the MTFS.	750		750			
			<b>PEOPLE GROWTH TOTAL</b>	<b>750</b>	<b>-</b>	<b>750</b>			
			<b>TOTAL SAVINGS PROPOSALS</b>	<b>(8,541)</b>	<b>(1,209)</b>	<b>(9,750)</b>			
			<b>TOTAL GROWTH</b>	<b>750</b>	<b>-</b>	<b>750</b>			
			<b>NET SAVINGS/GROWTH PROPOSALS</b>	<b>(7,791)</b>	<b>(1,209)</b>	<b>(9,000)</b>			

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**MEDIUM TERM FINANCIAL STRATEGY  
2024/25 to 2026/27**

**Appendix 2**

	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
<b>Budget Requirement Brought Forward</b>	196,354	203,416	207,476
Corporate & Technical	8,184	14,085	10,104
People	653	2,380	2,000
Place	-1,751	399	-377
Resources	-298	-338	0
Managing Director	23	0	0
Corporate	250	0	0
<b>Total</b>	<b>7,062</b>	<b>16,526</b>	<b>11,727</b>
<b>FUNDING GAP</b>	<b>0</b>	<b>-12,466</b>	<b>-6,732</b>
<b>Total Change in Budget Requirement</b>	<b>7,062</b>	<b>4,060</b>	<b>4,995</b>
<b>Revised Budget Requirement</b>	<b>203,416</b>	<b>207,476</b>	<b>212,471</b>
Collection Fund Deficit/-surplus	-790	0	0
Revenue Support Grant	-2,081	-2,081	-2,081
Top Up	-23,195	-23,195	-23,195
Retained Non Domestic Rates	-15,141	-15,141	-15,141
<b>Amount to be raised from Council Tax</b>	<b>162,208</b>	<b>167,059</b>	<b>172,054</b>
<b>Council Tax at Band D</b>	<b>£1,814.92</b>	<b>£1,869.19</b>	<b>£1,925.08</b>
<b>Increase in Council Tax (%)</b>	<b>4.99%</b>	<b>2.99%</b>	<b>2.99%</b>
Tax Base	89,375	89,375	89,375
	98.00%	98.00%	98.00%
Gross Tax Base	91,199	91,199	91,199

## MTFS 2024/25 to 2026/27 – Proposed investments / savings

Appendix 2

Technical Adjustments	2024/25	2025/26	2026/27
	£000	£000	£000
<b>Capital and Investment</b>			
Implications of Capital Programme agreed for 2020/21 to 2023/24			
Implications of Capital Programme agreed for 2021/22 to 2023/24 budget process	225		
25/26 Capital Programme costs from 22/23 refresh		1,747	
26/27 Capital Programme costs from 23/24 refresh			1,500
Capital Programme saving from 23/24 Review (£2.1m capital saving)	-182	92	-196
One off saving on Capital Financing costs due to underspends on Capital Programme	3,000		
Applying capital receipts to fund the Capital Programme	-1,300	-1,300	
Assume temporary savings on capital financing cost from slippage (one off)	-3,000	3,000	
Capital Receipts Flexibilities		1,250	
Assume Capital Receipts Flexibilities extended but on one-off basis		-1,250	1,250
<b>Total Capital and Investment Changes</b>	<b>-1,257</b>	<b>3,539</b>	<b>2,554</b>
<b>Grant Changes</b>			
Increase - Core Spending Grant	-6,000		
Reverse out £6m core grant	6,000		
December assumed no Services grant, but settlement confirmed continuation of services grant but at a reduced level. Figures only provided for 2023/24, therefore assume it will be halved in 2024/25 and then removed in 2025/26	770	771	
Social Care Grant - £12.807m allocation for 2023/24, less £7.720m base in 2022/23 less £300k ILF grant rolled in to social care	-2,035		
Adult Social care market sustainability grant and Improvements	-1,144		
- Adults Social Care Market sustainability grant & improvements (spend of 25%)	286		
IBCF (50% of the national allocation of £600m in 2023/24, increasing to £1bn by 2024/25)	-616		
IBCF contribution to pool	616		
Cost of Living Grant funded by Council Tax Support Fund (external grant)	310		
<b>Total Grant Changes</b>	<b>-1,813</b>	<b>771</b>	<b>0</b>
<b>Other Technical Changes</b>			
Freedom Passes - estimated reduction in usage (2022/23 process)			
Freedom Passes - revision to usage figures from London Council update (2022/23 process)	1,000		
Growth 24/25	2,322		
Growth 25/26		1,000	
November update on Freedom passes - improvement for 2023/24 and 2024/25 but worse in 2025/26. 2023/24 is still to be finalised.	-732	1,050	
<b>Use of Reserves</b>			
West London Waste Authority income from electricity - assume one-off income in 23/24	1,000		
West London Waste Authority income from electricity - assume income to continue for 2 more years	-1,000		1,000
<b>Total Other Technical Changes</b>	<b>2,590</b>	<b>2,050</b>	<b>1,000</b>
<b>Pay and Inflation</b>			
Pay Award @ 2.75% pa for 2023/24 and 2024/25	2,750		
Non Pay Inflation	1,000		
Pay award 2023/24 & 2024/25 - 4% / 2025/26 - 3%	1,250	3,000	
Pay award - Budget gap for 23/24 pay award	800		
Reduction of council wide growth 2024/25 to fund pay award	-755		
Pay award 2026/27 @ 3%			3,000
Non Pay Inflation - Additional £1m 2024/25, 2025/26 and 2026/27	1,000	1,000	1,000
<b>Total Pay and Price Inflation</b>	<b>6,045</b>	<b>4,000</b>	<b>4,000</b>
<b>OTHER</b>			
Gayton Road Income - Reprofiting of income	-11		
Growth London Living Wage	1,000		
- No LLW provision in 23/24 and reduced by 50% for 2024/25	-500	1,000	
Directorate growth	3,788		
Reverse out Directorate growth	-3,788		
Reverse Council wide Mgt saving	650		
Increase TM savings to offset Mgt saving - additional investment income being achieved	-650		
Council Tax Base increase	-500		
Council Tax Base increase	500	-250	-250

**MTFS 2024/25 to 2026/27 – Proposed investments / savings****Appendix 2**

<b>Technical Adjustments</b>			
	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
One off reduction of contingency budget	-175	175	
<b>Directorate Adjustments:</b>			
Adults care provider	1,550	1,800	1,800
General growth provision	1,000	1,000	1,000
Reduction in Council wide growth provision	-245		
<b>Total Corporate &amp; Technical</b>	<b>8,184</b>	<b>14,085</b>	<b>10,104</b>

**MTFS 2024/25 to 2026/27 – Proposed investments / savings**
**Appendix 2**

<b>People</b>			
	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
<b>Children &amp; Families</b>			
Proposed Savings - see appendix 1a	0	0	0
Proposed Growth - see appendix 1a	-900	0	0
Proposed Savings - see appendix 1b	-1,570	-500	
Proposed Growth - see appendix 1b	500	0	
<b>Sub total Children &amp; Families</b>	<b>-1,970</b>	<b>-500</b>	<b>0</b>
<b>Adults</b>			
Proposed Savings - see appendix 1a	0	0	0
Proposed Growth - see appendix 1a	4,612	3,175	2,000
Proposed Savings - see appendix 1b	-1,989	-295	
<b>Sub total Adults</b>	<b>2,623</b>	<b>2,880</b>	<b>2,000</b>
<b>Total People Directorate</b>	<b>653</b>	<b>2,380</b>	<b>2,000</b>

**MTFS 2024/25 to 2026/27 – Proposed investments / savings**

**Appendix 2**

<b>Place</b>			
	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
Proposed Savings - see appendix 1a	-448	-276	0
Proposed Growth - see appendix 1a	2,472	975	-377
Proposed Savings - see appendix 1b	-3,775	-300	
Proposed Growth - see appendix 1b	0	0	
<b>Total Place</b>	<b>-1,751</b>	<b>399</b>	<b>-377</b>

**MTFS 2024/25 to 2026/27 – Proposed investments / savings**

**Appendix 2**

<b>Resources</b>			
	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
Proposed Savings - see appendix 1a	0	0	0
Proposed Growth - see appendix 1a	410	-230	0
Proposed Savings - see appendix 1b	-708	-108	
Proposed Growth - see appendix 1b	0	0	
<b>Total Resources</b>	<b>-298</b>	<b>-338</b>	<b>0</b>

**MTFS 2024/25 to 2026/27 – Proposed investments / savings**

**Appendix 2**

<b>MANAGING DIRECTOR</b>			
	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
Proposed Savings - appendix 1a	0	0	0
Proposed Growth - appendix 1a	522	6	0
Proposed Savings - see appendix 1b	-499	-6	
Proposed Growth - see appendix 1b	0	0	
<b>Total Chief Executives</b>	<b>23</b>	<b>0</b>	<b>0</b>

**MTFS 2024/25 to 2026/27 – Proposed investments / savings**
**Appendix 2**

<b>CORPORATE</b>			
	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
Proposed Savings - appendix 1a	0	0	0
Proposed Growth - appendix 1a	0	0	0
Proposed Savings - see appendix 1b	0	0	
Proposed Growth - see appendix 1b	250	0	
<b>Total Corporate</b>	<b>250</b>	<b>0</b>	<b>0</b>



**Public Health Funding 2024-25****Appendix 3****Mandatory Services**

Sexual Health (incl Family Planning)	2,336	
0-19 Services	3,789	
Health Checks	185	
	<hr/>	6,310

**Discretionary Services**

Tobacco Control	104	
Drug & Alcohol Misuse	1,903	
Physical Activity	30	
	<hr/>	2,037

**Staffing & Support Costs**

Staffing	1,309	
Non-Staffing	28	
Overheads	163	
	<hr/>	1,500

Health Improvement	667	
Wider Determinants of Health	1,651	
	<hr/>	2,318
		<hr/>
<b>Total Expenditure</b>		<b>12,165</b>

**Funded by**

Department of Health Grant	-12,165	
Contribution from Reserve		
<b>Total Income</b>		<b>-12,165</b>

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## School Budgets – Dedicated Schools Grant (DSG) 2024-25

### Introduction

1. The Dedicated Schools Grant (DSG) is a ring-fenced grant of which the majority is used to fund individual schools budgets in maintained schools and academies in Harrow. It also funds Early Years nursery entitlement for 2-, 3- and 4-year-olds in maintained council nursery classes and private, voluntary and independent (PVI) nurseries as well as provision for pupils with High Needs including those with Education Health & Care Plans (EHCPs) in special schools, special provision and mainstream schools in Harrow and out of borough. The DSG is split into four blocks: Schools Block, Central School Services Block, Early Years Block and High Needs Block.

### Schools Funding for 2024-25

2. In 2018-19 the government introduced a new National Funding Formula (NFF) for Schools, High Needs and the Central Schools services Block. For the Schools Block this means LAs are funded on the basis of the total of the NFF for all school, academies and free schools in its area. However, the final formula for distribution is determined by each Council following consultation with schools and Schools Forums.
3. The LA carried out a consultation in Autumn 2017 which sought views on whether the LA should continue to use the Harrow Schools Funding Formula or introduce the National Funding Formula from 2018-19. 76% of schools responded to the consultation and 89% voted in favour of introducing the NFF from 2018-19. This was approved by Cabinet in February 2018 and school budgets for the last five years have been set based on the NFF.
4. The NFF will therefore continue to be used to distributed school budgets for 2024-25.
5. From 2020 the government intended to implement the NFF in full which means that school allocations will be determined by the DfE rather than LAs. However, this has been delayed and there is no fixed date for this.
6. There are no proposed changes to the **structure** of the formula for 2024-25 however there are a number of changes for schools to be aware of.

### Changes in 2024-25

#### Increase in factor values

7. NFF Factor values have increased by:
  - 1.4% to basic entitlement, low prior attainment, FSM6, Income Deprivation Affecting Children Index (IDACI), English as an Additional Language (EAL) mobility and the lump sum.
  - 1.4% to the Minimum Per Pupil Levels (MPPL)

- 0.5% to the funding floor
  - 1.6% to the Free School Meals (FSM) factor
8. The 2023-24 Mainstream Schools Additional Grant (MSAG) will be rolled into the NFF. Adjustments have been made to the NFF factor values to reflect this and are included in the figures below, as well as the factor value increases.

**Table 1 – funding formula factor values**

Factors	2023-24		2024-25		% Change	
	Pri	Sec	Pri	Sec	Pri	Sec
Pri AWPU	£3,740		£3,920		4.82%	
KS3 AWPU		£5,272		£5,527		5%
KS4 AWPU		£5,942		£6,230		5%
FSM	£529	£529	£539	£539	2%	2%
Ever6	£777	£1,135	£902	£1,321	16%	16%
IDACIF	£253	£369	£259	£374	2%	1%
IDACIE	£309	£490	£314	£495	2%	1%
IDACID	£485	£683	£490	£693	1%	1%
IDACIC	£529	£749	£534	£759	1%	1%
IDACIB	£562	£804	£567	£814	1%	1%
IDACIA	£738	£1,025	£748	£1,040	1%	1%
LPA	£1,273	£1,928	£1,288	£1,953	1%	1%
EAL	£639	£1,724	£649	£1,744	2%	1%
Mobility	£1,041	£1,499	£1,056	£1,519	1%	1%
Lump Sum	£141,039	£141,039	£147,902	£147,902	5%	5%

9. The Minimum Per-Pupil Funding Levels (MPPL) will be set at £4,610 for primary schools and £5,995 for secondary schools compared with £4,405 and £5,715 in 2023-24.
10. Teachers Pay Grant (TPG) and Teachers Pension Employers Contribution Grant (TPECG) are now fully rolled into the NFF.
11. Block transfers – LAs will continue to be able to transfer up to +0.5% of the schools block to other blocks of the DSG, with schools forum approval. A disapplication is required for transfers above 0.5% or for any amount where schools forum does not give approval.

**Minimum Funding Guarantee (MFG)**

12. The MFG will continue and the allowable range for 2024-25 is between 0% and +0.5% which is the same as 2023-24
13. This means that each school could gain up to +0.5% *per pupil* compared with the 2023-24 budget. The final value of MFG will be determined by overall affordability within the formula.
14. Where schools are protected by MFG this means that they are receiving funding over and above that which is calculated by the NFF because of the levels of funding they

had been receiving prior to the introduction of the NFF. In future years if the MFG protection is removed then those schools who are funding above the NFF will see an immediate drop in funding from one year to the next.

### **Teacher's Pay Additional Grant (TPAG) 2023-24 and 2024-25**

15. In July 2023 the government announced the TPAG to support schools with the September 2023 teachers' pay award. Funding will be allocated to mainstream schools (5-16 age range), special and Alternative Provision schools. Funding will also be provided for eligible early years provision and 16 to 19 provision in mainstream schools
16. In 2023-24 funding will be for the period September 2023 to March 2024. The TPAG will continue into 2023-25 as a separate grant.

### **Central School Services Block**

17. The CSSB funds the following services:
  - School Admissions
  - Servicing of Schools Forum
  - LA retained duties for schools and academies.
18. The indicative funding for 2024-25 is £1.509m.

### **Growth Fund**

19. Schools Forum agreed to continue to maintain a ring-fenced growth fund from the DSG in order to fund in-year pupil growth in relation to additional classes in maintained and academy schools to create additional classes at the LA's request.

### **High Needs Funding**

20. High Needs funding is designed to support a continuum of provision for pupils and students with special educational needs and disabilities (SEND) from 0-25 years old. The following are funded from the High Needs Block of the DSG:
  - Harrow special schools and academies
  - Additionally Resourced Mainstream (ARMs) units in mainstream schools
  - Places in out of borough special schools and independent school provision
  - EHCPs in mainstream schools and academies
  - Post 16 provision including Further Education
  - SEND Support services and support for inclusion
  - Alternative provision including Pupil Referral Units and education other than at school
21. The government introduced a National Funding Formula for High Needs from 2018-19. Funding has previously been based on historical allocations plus small annual amounts of growth. In order to manage increasing growth for demand and complexity, annual funding transfer from the schools block into the high needs block have been approved by Schools Forum

22. From 2018-19 the Schools Block has been ring-fenced and transfers between blocks has been restricted to 0.5% of the Schools Block (approx. £970k). The decision to agree a transfer remains with Schools Forum. It agreed a transfer of 0.5% in 2018-19 and a reduced transfer of 0.25% in 2019-20 however it did not agree to any transfer beyond 2019-20 on the basis that the government should be properly addressing the inherent underfunding of High Needs pupils and to continue to top slice mainstream school budgets masks the extent of the problem.
23. There is anticipated to be an additional £1.3m added to the HNB for 2023-24 however there are already significant pressures on the HNB.
24. At the start of 2023-24 there is a cumulative overspend on the HNB of £2.623m and there is a further projected overspend in 2023-24 of £2.482m, taking the projected cumulative deficit on the HNB to £5.104m by March 2024.

### **DSG deficits**

25. The government consulted on the treatment of deficits in 2019. The outcome of the consultation was a change to the regulations for the treatment of DSG deficits so that LAs must carry forward any HNB deficit to be funded from the next year's budget share. It also explicitly states that LAs cannot and should not fund any DSG deficit from its own reserves.

### **DSG Management Plans**

26. A DSG management plan has been drafted however and discussed with Schools Forum. The SEND Strategy will also be brought to Cabinet for approval in Spring 2024 which will contain updated pupil and financial projections. However, the following points should be noted:
27. Despite the significant proposals and measures planned over the next ten years, this will not mitigate the deficit. This is due to the following contributory factors:
- historical underfunding
  - current budgets being based on historical budgets rather than historical spend
  - extension of age range to include 0-5 and post 19
  - current and projected formulaic funding which does not keep pace with demand
  - significant historical and projected growth in number of EHCPs
  - continued growth in complexity of pupils' needs
  - limitations about creating cost effective provision in borough due to capacity and site limitations

### **Early Years Funding**

28. Funding for Early Years relates to free 15-hour nursery entitlement for all 3- & 4-year-olds in maintained nurseries and nursery classes as well as private, voluntary and independent (PVI) provision. From September 2017 this was extended to 30-hour nursery entitlement for eligible 3- & 4-year-olds. It also funds free 15-hour nursery entitlement for disadvantaged 2-year-olds.

29. A National Funding Formula for Early Years was introduced in 2017-18. Cabinet approved the structure of the Harrow formula for the distribution of funding to providers in January 2018.
30. In 2023-24 there has also been an increase to the published funding rates for 2-, 3- and 4-year-old nursery provision for September 2023 to March 2024. This will be provided through the new Early Years Supplementary Grant (EYSG). This has been used to increase the hourly rates to LAs which in turn must be passed on to providers.
31. From 2024-25 the EYSG funding will be rolled into the Early Years Block of the DSG.
32. Funding rates and allocations will be announced in December 2023.

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**REPORT FOR: CABINET**

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<b>Date of Meeting:</b>	19 December 2023
<b>Subject:</b>	Draft Revenue Budget 2024/25 and draft Medium Term Financial Strategy to 2026/27
<b>Key Decision:</b>	Yes
<b>Responsible Officer:</b>	Sharon Daniels – Interim Director of Finance and Assurance (S151 Officer)
<b>Portfolio Holder:</b>	Councillor David Ashton – Portfolio Holder for Finance and Human Resources
<b>Exempt:</b>	No
<b>Wards affected:</b>	All
<b>Enclosures:</b>	<b>Appendix 1A</b> – Savings and Growth from 2024/25 Budget Process <b>Appendix 1B</b> – Savings and Growth from 2023/24 Budget Process <b>Appendix 2</b> - Medium Term Financial Strategy 2024/25 to 2026/27 <b>Appendix 3</b> – Draft Public Health Budget 2024/25 <b>Appendix 4</b> - Draft Schools Budget 2024/25

This report sets out the draft revenue budget for 2024/25 and draft Medium Term Financial Strategy (MTFS) to 2026/27. The budget and MTFS will be brought back to Cabinet in February 2024 for final approval and recommendation to Council.

**Recommendations:**

Cabinet is requested to:

- 1) Approve the draft budget for 2024/25 and the MTFS to 2026/27 for general consultation as set out in Appendices 1(A & B) and 2 so that Cabinet may later consider the budget including the consultation responses and the equality impact assessment (s), before it is referred to Council in February 2024.
- 2) Note the draft budget will be updated when the detail is announced in the Indicative Financial Settlement which is expected on 19 December followed by the Final Settlement in January 2024 (paragraph 1.07).
- 3) Note that, at draft budget stage, there remains an estimated budget gap of £0m for 2024/25, £12.466m for 2025/26 and £6.732m for 2026/27.
- 4) Note the proposal to increase core Council Tax by 2.99% in 2024/25, 2025/26 and 2026/27 (paragraph 1.19 and 1.21).
- 5) Note the proposal to increase Adult Social Care Precept Council Tax by 2% in 2024/25 and then by 0% per annum in 2025/26 and 2026/27 in respect of the Adult Social Care Precept (paragraph 1.19 and 1.21).
- 6) Approve the draft Public Health budget for 2024/25 as set out in Appendix 3.
- 7) Note there are no proposed structured changes to the schools funding formula for 2024/25 as set out in Appendix 4.
- 8) Note the assumed funding for the protection of social care 2024/25 through the Better Care Fund (paragraphs 1.38 to 1.41)
- 9) Authorise the Interim Director of Finance and Assurance, following consultation with the Portfolio Holder for Finance and Human Resources, to agree Harrow's 2024/25 contribution to the London Borough's Grant Scheme (paragraph 1.46).

Final approval will be sought from Cabinet and Council in February 2024.

**Reason: (For recommendations)**

To ensure that the Council publishes a draft budget for 2024/25 and a draft MTFS to 2026/27.

## **Section 2 – Report**

### **BACKGROUND**

- 1.01 Harrow remains one of the lowest funded Councils both within London and nationally. The Council does not benefit from large reserves compared with the rest of London and is in the lower end of the lower quartile for reserve balances held.
- 1.02 Over the past 10 years, the Council's revenue support grant has reduced from £50.5m to £2m in 2023/24 and whilst the Council does receive other grant funding to support services, these grants are all ring fenced to areas of activity and cannot be used to support the core budget, for example the Dedicated Schools Grant of £143m. In 2023/24 these grants total £366m.
- 1.03 The Council does not receive specific funding to meet demographic growth and demand led pressures. In addition, inflation has increased substantially, creating unfunded budget pressures.
- 1.04 In previous years, Council Tax has been increased to just below referendum limits and full use has been made of the Adults Social Care Precept, both of which were in line with central government expectations. The impact of this is that the Council is heavily reliant on Council Tax to fund its core budget. In 2023/24 approximately 78% of the Council's net revenue budget of £196.3m is funded from Council Tax.

### **SUMMARY**

- 1.05 The draft budget set out in this report shows an updated MTFS to the figures agreed by Council in February 2023. After all adjustments, the budget for 2024/25 is balanced, but there remain budget gaps of £12.466m and £6.732m over the two years of MTFS for 2025/26 and 2026/27.
- 1.06 It is important to note that for 2025/26 and 2026/27, many of the budget adjustments are estimated at a high level due to the challenges of forecasting complex issues such as inflation, demand, and demographics so far in advance. As the budget is approved annually, the latter two years of the MTFS will be subject to substantive review and adjustment before finally being approved.
- 1.07 The draft MTFS is based on the announcements made as part of the 2023/24 Finance Settlement (which covered 2023/24 and 2024/25) and will be updated further once the detail of the 2024/25 Local Government Provisional Financial Settlement is known, which is expected to be announced on 19 December 2023. Estimates have been based on the most up to date information known at the time of setting the draft MTFS. It is likely this position will change following the indicative settlement. This change could be for the better or worse. The final settlement is expected to be agreed by the end of January 2024.

## **AUTUMN STATEMENT 2023**

- 1.08 The Chancellor of the Exchequer, Jeremy Hunt, delivered the 2023 Autumn Statement on 22nd November 2023. As well as the usual updates on the state of public finances and the performance of the economy, the Chancellor organised his policies into five key areas: reducing debt; cutting tax and rewarding hard work; backing British business; building domestic and sustainable energy; and delivering world-class education.
- 1.09 The key policy announcements relating to public spending and local government are summarised below:

### **Local Government Funding**

- There was no new funding for 2024-25 for adult or children's social care or any general local government funding, beyond what was announced last year.

### **Housing and Homelessness**

- Local Housing Allowance rates will be raised to a level covering 30% of local market rents.
- Additional funding of £120m for homelessness prevention (UK-wide) in 2024-25. The details of the allocations are not yet known and therefore the Harrow allocation is still to be confirmed.
- Local Authority Housing Fund to be extended with a third round worth £450m to deliver new housing units and temporary accommodation for Afghan refugees.
- For the Housing Revenue Account, there is a rate extension of £5m to June 2025 of the Public Works Loan Board policy margin announced in Spring 2023.
- There are plans to allow local authorities to be able to fully recover the cost of planning fees for major planning applications if decisions are made within certain timelines.
- Local Planning Authorities to receive £32m to tackle planning backlogs.

### **Business Rates**

- The standard business rate multiplier will be increased by September CPI (6.7%) and the small business rate multiplier will be frozen for a fourth consecutive year.
- The 75% Retail, Hospitality and Leisure relief will be extended for 2024-25.
- Local authorities will be fully compensated for the loss of income because of these two measures and will receive new burdens funding for administrative and IT costs.

### **Local Government Pension Schemes**

- Reforms are anticipated to the Local Government Pension Scheme, including confirmation of guidance that will implement a 10% allocation ambition for investments in private equity, and establish a March 2025 deadline for the accelerated consolidation of LGPS assets into pools.

### **National Living Wage and Benefits**

- From April 2024, the National Living Wage will increase by 9.8% to £11.44 an hour and the age threshold lowered from 23 to 21 years old.
- The triple-lock for pensions will be continued (an increase of 8.5%) and benefits will increase in line with the September CPI (6.7%).

- 1.10 There have been no changes made to the MTFS as a result of the Autumn Statement as the detail of any funding changes for 2024/25 will be included in the Financial Settlement for Local Government, which is due around the 19 December 2023, as indicated above.

## **DELIVERY OF THE 2023/24 BUDGET**

- 1.11 Harrow has had a good track record of robust financial management and has not reported a revenue budget overspend for many years. The budget for 2022/23 was originally based on drawing down £14.7m of reserves to bring in a balanced position. The final position for 2022/23 improved significantly as a result of careful control and oversight of budgets, which meant that only £5.8m of reserves were needed (as opposed to £14.7m) to bring the budget into a balanced position.
- 1.12 Performance against the current 2023/24 revenue budget is detailed in a separate report on this agenda, 'Revenue and Capital Budget Monitoring Report 2023-24 Q2'. This report forecasts a net overspend of £1.379m as at 30<sup>th</sup> September 2023. If the position does not improve before year end it would be necessary to drawn down this amount from the MTFS Budget Planning Reserve to bring in a balanced position, but it is anticipated that 2023/24 can be balanced with no draw down from reserves other than those already built into the budget.
- 1.13 In line with the national picture, the Council is being heavily impacted by inflation. Budget provision for pay inflation was £4m (4%). The 2023/24 pay award has recently been announced and it equated to an increase of 7% against the pay bill and has creating a budget pressure of £3.2m. The bulk of this pressure has been funded from the general corporate budget and the non-pay inflation provision, but still leaves an £800k shortfall to be carried forward into 2024/25.
- 1.14 In addition, there are very substantial pressures on demand in adult services. Such is the scale of the demand, that across the 3 years of the MTFS from 2024/25 to 2026/27, a further £9.7m has been added in as a budget growth, as set out in Table 1.

## **BUDGET PROCESS 2024/25**

- 1.15 The Council has a statutory obligation to agree and publish the budget for 2024/25, and approval for this will be sought in February 2024. In preparing the 2024/25 budget and rolling forward the MTFS to cover the three-year period to 2026/27, the current MTFS has been the starting point for the process.
- 1.16 The Council's financial position and its operational environment has always been affected by several financial uncertainties and adjustments that impact upon its financial position over the short and medium term. In preparing the draft budget for 2024/25 the existing MTFS has been:
- Refreshed and rolled on a year into 2026/27
  - Updated to reflect the demand pressures as well as any opportunities and savings, plus council tax changes.
- 1.17 The adjustments are summarised in Table 1 below. Following Table 1 there is an explanation for the figures contained within the table. These adjustments are also set out in Appendix 2 along with adjustments included within the previous MTFS agreed as part of the 2023/24 Budget process. Table 1 shows budget gaps of £0m for 2024/25, £12.466m for 2025/26 and £6.732m for 2026/27.

Table 1: Changes to the MTFs (Prior to Indicative Settlement)			
	2024/25	2025/26	2026/27
	£'000	£'000	£'000
<b>Budget Gap (February 2023)</b>	<b>0</b>	<b>6,321</b>	<b>0</b>
Reversal out of Social Care Grant		6,822	
<b>Budget Gap (February 2023)</b>	<b>0</b>	<b>13,143</b>	<b>0</b>
<b>Council Tax Changes</b>			
Core CT @2.99%			-4,995
Increase 2024/25 by 1 % to 4.99%	-1,545		
Residual Tax Base Increase for 2024/25	-21		
Increase in CT base - 150 band D equivalents		-312	-250
Council Tax Collection Fund Surplus (one off)	-790	790	
<b>Grants and Technical Adjustments</b>			
Council Wide Growth			1,000
One off reduction of contingency	-175	175	
Assume Social Care Grant will remain with LA		-6822	
Assume that Capital Flexibilities will be extended on one off basis		-1250	1,250
Assume temporary savings on capital financing cost from slippage (one off)	-3000	3,000	
Reverse Council wide Mgt saving	650		
Increase TM savings to offset Mgt saving - additional investment income being achieved through improved investment returns	-650		
West London Waste Authority energy income (electricity)	-1000		1000
<b>Capital Programme Review</b>			
Resources - reduction of £600k in the Capital Programme. Therefore reducing capital financing cost in the revenue budget.	-34	92	-196
Place - reduction of £1.964m in the Capital Programme. Therefore reducing capital financing costs in the revenue budget.	-148		
2026/27 Capital Programme Cost			1,500
<b>Pay award 2023/24</b>			
£6.4m budget available. pay award £7.2m. Gap for 2023/24 pay award of £800k.	800		
Reduction of council wide growth 2024/25 to fund pay award	-755		
<b>Pay award 2024/25</b>			
£5.5m provision for pay and £1.0m for non pay - already assumed in the previous 2023/24 budget setting.			
<b>Pay award 2025/26</b>			
£5m provision for pay and £1m for non pay - already assumed in the previous 2023/24 budget setting.			
<b>Pay award 2026/27</b>			
Pay award @ 3%			3000
<b>Provision for Non Pay Inflation</b>			
Non Pay inflation provided for £1m in line with previous provisions.			1000
<b>Directorate Pressures plus Mitigations</b>			
<b>Resources and Managing Director</b>			
Resources - Access Harrow saving was not progressed as a result of a decision to keep the phone lines open for residents accessing the Revenues and Benefits service	180		
Managing Director (Finance and Assurance) - increase in external audit fees	250		
Managing Director (Finance and Assurance) - internal audit & CAFT	260		
Resources - one off budget for payroll staff ( staff previously working on schools payroll retained to work on general payroll)	230	-230	
Discretionary Freedom Pass - reversal of saving	12	6	
<b>People's Directorate</b>			
<b>Adults</b>			
Adults demand pressures (£9.787m over 3 years)	5440	2347	2000
Additional award of Market Sustainability and Improvement Fund (MSIF) grant for adults.	-828		
MSIF grant assumed as permanent grant but add to adults base for 2025/26		828	
Care Provider Inflation for Social care - in line with prior year allocations			1800
<b>Children's</b>			
Children's Placements & Accommodation budget - reduction of growth provided for placements in previous years - in 2023/24 £4.35m was provided and £1m of this is now being reversed.	-1000		
Growth in Education for staffing re: statutory duties	100		
<b>Place</b>			
Parking PCN 23/24 income shortfall - rephase £1m saving into 2025/26	1,000	-1000	
Parking P&D income shortfall	360		
Planning & Building Control income (£116k attributable to MTFs savings)	341		
Potential Homelessness demand pressure		2,325	
Housing staffing resource - one off requirement	180	-180	
Local Plan review	91	80	-171
Saving to reduce waste disposal costs through behavioural change (residents)			
Rephasing of £0.5m saving over 2 years	250	-250	
Additional Street Cleaning funding	250		
Local Plan Review -reversal of growth provided in 2024/25 and 2025/26			-206
Savings put forward in Appendix 1A	-448	-276	
<b>Revised Budget Gap after Risks and Opportunities</b>	<b>0</b>	<b>12,466</b>	<b>6,732</b>

## Council Tax and NNDR Changes

- 1.18 In 2023/24, despite an increase in Council tax of 4.99% which raised additional revenue of £7.8m (Council tax income increased from £146.2m to £154.0m), the cost of the 2023/24 pay award (only agreed in October 2023) is £7.2m and therefore, this left very little funding available for other demand pressures that have emerged in adult services and other inflationary pressures.
- 1.19 The assumed Council tax levels built into the MTFS agreed in February 2023 were based on 3.99% for 2023/24 and 2.99% for 2025/26. The changes made in Table 1 reflect an assumed Council tax of 2.99% in 2026/27 and an additional 1% assumed for 2024/25 which would take the increase from 3.99% to 4.99% for 2024/25. There is no change to the assumed 2.99% for 2025/26. This therefore provides for Council tax increases of 4.99%, 2.99% and 2.99% for the 3-year period 2024/25 to 2026/27.
- 1.20 In Table 1, the additional 1% in 2024/25 achieves additional income of £1.545m, whilst the original 3.99% achieves income of £6.144m. Therefore, the total council tax to be achieved from the 4.99% increase is £7.689m. The addition of 2.99% in 2026/27 provides £4.995m of council tax income in 2026/27.

In addition, the Council's tax base has been calculated, (according to the relevant procedures and guidance) at 89,375 band D equivalent properties, which is an increase of 290 Band D equivalents on the 2023/24 Band D of 89,085. This will generate additional income of £0.521m in 2024/25. Because £0.5m had already been included in the 2024/25 assumptions when the MTFS was set last year in Feb 2023, Table 1 only includes a further £21k. There are further tax base increases assumed for 2025/26 and 2026/27 and included in Table 1, which will be revisited as part of the 2025/26 budget process.

- 1.21 A maximum Council Tax increase of 4.99% is budgeted for 2024/25 in line with announcements made as part of the 2023/24 Finance settlement in December 2022. There is uncertainty as to whether the 2024/25 settlement will provide guidance as to the maximum level of Council Tax increase for 2025/26 and 2026/27 and for this reason, the working assumption has been left at 2.99% for both of these years.
- 1.22 The Autumn Statement 2023 is clear that the small business rates multiplier will be frozen in 2024/25 and local authorities will be fully compensated for any loss of income at the September CPI level of 6.7%. Freezing the multiplier means businesses will not see an increase in their bills and the Council will be compensated for this loss of inflationary income through the NNDR Multiplier Grant. However, due to revaluation losses in NNDR, there is no assumed increase in NNDR built into the budget for 2024/25 and this will be revisited following the announcement of the 2024/25 Finance settlement. Rateable value generally reduces annually in Harrow, this being a trend that has existed locally for several years.



- 1.23 The Collection Fund and its impact on the 2024/25 budget is subject to a separate report elsewhere on this agenda (Report: Estimated Surplus/(Deficit) on the Collection Fund 2023/24). The estimated impact on the 2023/24 Collection Fund is a surplus of £0.790m which must be accounted for as a one-off income against the 2024/25 budget and is included in Table 1.

### **Technical Changes**

- 1.24 A number of other adjustments have been included in Table 1 which are explained as follows:
- £1m of council wide growth in 2026/27 – this is a general allowance for growth as, other than for adults, there is no other departmental growth included.
  - £175k one off reduction of the contingency budget to balance the 2024/25 budget whilst awaiting the 2024/25 Finance settlement which could bring in some other opportunities to balance the budget.
  - In 2023/24, £6.822m of social care funding was awarded for 2 years and initially it was felt that it was possible that the grant might have to be used in 2025/26 for Social Care reform. Therefore, in arriving at the original budget gap of £13.143m in 2025/26, it had been assumed that the grant would be removed, resulting in an increase of the gap from £6.321m to £13.143m. It is now widely assumed that this grant will not be removed and therefore Table 1 reverses that assumption which improves the 2024/25 position by £6.822m.
  - Capital Flexibilities are assumed for a further year in 2025/26 which enables the Council to charge transformation costs to capital and thereby reduce the cost to the revenue budget. £1.25m is assumed for 2025/26 as a one-off basis.
  - Capital financing savings of £3m are assumed on a one-off basis as a result of slippage expected in the capital programme based on past experience.
  - Treasury Management savings of £650k are assumed in 2024/25 which will offset a previous saving not achieved in overall Management savings.
  - The Council has received some cash rebates from West London Waste Authority of £1.6m and £2.4m respectively in 2022/23 and 2023/24 as a result of energy income. The energy from waste facility generates electricity which then generates an income for the WLWA. A decision was made to reimburse a proportion of the energy income to the six constituent boroughs. Therefore, the budget assumes £1m for a further 2 years but then this is reversed out in 2026/27, since it cannot be assumed to continue indefinitely.
  - As a result of a review of the existing Capital Programme, it has been possible to remove some surplus capital budgets and therefore reducing capital financing costs by a net £286k across the MTFs period (-£182k 2024/25, £92k 2025/26 and -£196k 2026/27).

- The cost of the 2023/24 Capital Programme was approved as part of the 2023/24 budget setting process, but as the cost of £1.5m fell into 2026/27 which was last year outside of the MTFs period, the cost of £1.5m is now included.
- The pay award for 2023/24 has recently been agreed and cost £7.2m, an approximate 7% uplift against the pay bill. The 2023/24 budget included a provision of £4m and there were other budgets (non-pay inflation and corporate budgets) of £2.4m available to fund the pay award, which leaves an £800k shortfall that need to be built into the 2024/25 budget. To offset the pressure, a corporate growth budget of £755k is being reduced to fund it.
- In terms of 2024/25, 2025/26 and 2026/27, pay award budgets have been assumed of £5.5m, £5m and £3m respectively. Over the past few years, the pay awards have been agreed very late in the financial year and for both 2022/23 and 2023/24, the pay agreements have been reached around October time which makes it very difficult for budgeting purposes.
- Non pay inflation, which covers areas such as energy costs and contractual up lifts, is set at £1m pa in 2024/25 and 2025/26 and is increased by a further £1m for 2026/27.

### **Directorate Pressures/Savings**

1.25 The rest of the figures in Table 1 relate to Directorate pressures in the main, with a small number of savings which are detailed in Appendix 1A. As can be seen from Table 3 and Appendix 1A, there is growth of £6.7m, £3.6m and £1.6m built into the MTFs across the 3 years 2024/25 to 2026/27, which total £11.9m. Growth in the Adult social care budget accounts for £9.8m of the net growth.

1.26 After all the adjustments, the result is an estimated gap across the MTFs of £19.198m as follows:

2024/25 £0m  
 2025/26 £12.466m  
 2026/27 £6.732m

1.27 Between now and the Final Budget in February 2024, and further in 2024, the next steps are:

- Clarify the implications on the MTFs of the Indicative Financial Settlement when received in late December
- Continue to review/refine pressures, to reduce the impact of the gap in future years of 2025/26 and 2026/27.  
 Focus on efficiencies to reduce the impact of the gap in future years of the MTFs.

## Growth & Savings

- 1.28 Table 2 below summarises the savings and growth previously agreed as part of the 2023/24 budget process. This shows that there are net savings of £7.791m in 2024/25 and £1.209m in 2025/26. Therefore, total savings of £9.0m across the 2 years.

**Table 2: Savings and Growth from the 2023/24 Budget Process  
(Detail in Appendix 1B)**

	2024-25	2025-26	Total
	£000	£000	£000
<b>Savings</b>			
Resources	(708)	(108)	(816)
Managing Director	(499)	(6)	(505)
Place	(3,775)	(300)	(4,075)
Adults	(1,989)	(295)	(2,284)
Childrens	(1,570)	(500)	(2,070)
Corporate/Council Wide			-
<b>Total Savings</b>	<b>(8,541)</b>	<b>(1,209)</b>	<b>(9,750)</b>
<b>Growth</b>			
Childrens	500	-	500
Corporate	250	-	250
<b>Total Growth</b>	<b>750</b>	<b>-</b>	<b>750</b>
<b>Net Total Savings and Growth</b>	<b>(7,791)</b>	<b>(1,209)</b>	<b>(9,000)</b>

- 1.29 Table 3 summarises “new” growth and savings from the current 2024/25 budget setting process. This shows that there is net growth of £6.668m in 2024/25, £3.65m in 2025/26 and £1.623m in 2026/27. Therefore, this is net growth across the 3 years of £11.941m.

**Table 3: Savings and Growth from the 2024/25 Budget Process  
(Detail is set out in Appendix 1A)**

	2024-25	2025-26	2026-27	Total
	£000	£000	£000	£000
<b>Savings</b>				-
Place	(448)	(276)	-	(724)
<b>Total Savings</b>	<b>(448)</b>	<b>(276)</b>	<b>-</b>	<b>(724)</b>
<b>Growth</b>				
Resources	410	(230)	-	180
Managing Director	522	6	-	528
Place	2,472	975	(377)	3,070
Adults	4,612	3,175	2,000	9,787
Childrens	(900)	-	-	(900)
<b>Total Growth</b>	<b>7,116</b>	<b>3,926</b>	<b>1,623</b>	<b>12,665</b>
<b>Net Total Savings and Growth</b>	<b>6,668</b>	<b>3,650</b>	<b>1,623</b>	<b>11,941</b>

The summary information in the tables is supported by the details in appendices 1A and 1B.

## **CAPITAL RECEIPTS FLEXIBILITY**

- 1.30 In 2016 the government announced the Capital Receipts Flexibility Scheme to support local authorities to deliver more efficient and sustainable services by allowing them to spend up to 100% of their fixed assets receipts on the revenue costs of transformation projects. The flexibility has been extended on numerous occasions and is currently in place until 31 March 2025 but is likely to be extended and will be confirmed in the 19 December Finance settlement.
- 1.31 As part of the 2023/24 Budget process, the use of capital flexibilities was in place for 2023/24 and 2024/25 and then being reversed out in 2025/26. Table 1 assumes a continuation for a further year into 2025/26 but then is discontinued and the budget is reinstated for 2026/27. The MTF5 includes a budget of £1.250m to fund the Regeneration Team. The nature of this spend meets the capital flexibility criteria and the team will be funded under the capital flexibilities scheme. The £1.250m provision is re-instated in 2026/27.

## **PUBLIC HEALTH FUNDING 2024/25**

- 1.32 In 2023/24 the total public health grant to local authorities totalled £3.529bn, with £12.007m being allocated to Harrow. The grant is ringfenced for use on public health functions exclusively for all ages of the population and must be spent in accordance with grant conditions on expenditure incurred by local authorities for the purposes of their public health functions, as specified in Section 73B (2) of the National Health Service Act 2006.
- 1.33 The draft Public Health commissioning intentions detailed in Appendix 3 are based on the indicative grant allocation for 2024-25 of £12.165m as advised by DHSC in March 2023 and indicate a 1.3% uplift, taking the total national funding for 2024-25 to £3.575bn. These commissioning intentions reflect alignment with the Health & Wellbeing Strategy, Borough Plan, and evidence of population priorities.
- 1.34 The Council consider that this level of funding enables the Council's overarching statutory duties (including equality duties) to be maintained, taking account of the joint strategic needs assessment. However, if additional duties are required by Councils, and if these were unfunded, the commissioning intentions would need to be reviewed in light of the allocated grant envelope.

## **SCHOOLS FUNDING FOR 2024/25**

- 1.35 In 2018/19 the government introduced a new National Funding Formula (NFF) for Schools, High Needs and the Central Schools services Block. For the Schools Block this means LAs are funded based on the total of the NFF for all schools, academies, and free schools in its area. However, the final formula for distribution is determined by each Council following consultation with schools and Schools Forums.

- 1.36 The LA carried out a consultation in Autumn 2017 which sought views on whether the LA should continue to use the Harrow Schools Funding Formula or introduce the National Funding Formula from 2018/19. 76% of schools responded to the consultation and 89% voted in favour of introducing the NFF from 2018/19. This was approved by Cabinet in February 2018 and school budgets for the last three years have been set based on the NFF.
- 1.37 The NFF will therefore continue to be used to distributed school budgets for 2024/25. There are no proposed changes to the structure of the formula for 2024/25 as detailed in Appendix 4. The proposed final funding formula and final DSG allocations will be reported to Cabinet in February 2024 for approval.

### **BETTER CARE FUND (BCF) 2024/25**

- 1.38 The framework for the Better Care Fund (BCF) derives from the government's mandate to the NHS which sets an objective for NHS England to ring fence funding to form the NHS contribution to the BCF. The NHS Long Term Plan, published in January 2019 set out the priorities for transformation and integration, including plans for investment in integrated community services and next steps to develop Integrated Care Systems.
- 1.39 The BCF continues to provide a mechanism for personalised, integrated approaches to health and care that support people to remain independent at home or to return to independence after a period in hospital. The continuation of the national conditions and requirements of the BCF provides opportunities for health and care partners to build on their plans to embed joint working and integrated care further, including how to work collaboratively to bring together funding streams to maximise the impact on outcomes for communities and sustaining vital community provision.
- 1.40 Following submission of the planning template covering the period 2023-2025 in August 2023, and assurance by NHS England, the 2024/25 Adults budget assumes that funding for the Protection of Social Care through the BCF will be £7.954m – an increase of 5.66% on the funding for 2023-24, reflecting the NHS funding commitments made within the spending review.
- 1.41 The total value of the Better Care Fund in Harrow for 2024-25 is £31.406m and includes a range of grants (including the Disabled Facilities and Adults Discharge Grants) and schemes across both Health and Social Care. The Better Care Fund Policy statement and Policy Framework and Planning Requirements will provide the detailed guidance when published in early 2024 (usually March). The requirements around integration and collaborative working are expected to continue.

### **RESERVES AND CONTINGENCIES**

- 1.42 Reserves and contingencies need to be considered in the context of their role to protect the Council's financial standing and in the context of the overall risks that the Council faces during a continuing period of economic uncertainty. The MTFs reflects the Council's need to ensure an adequate level of reserves and contingencies which will enable it to manage the risks

associated with delivery of the budget including equalities impacts and unforeseen events.

- 1.43 The Council's overall reserves position is reported to Cabinet quarterly as part of the revenue monitoring update. At quarter 2 (end of September 2023), total reserves forecast for carry forward into 2024/25 are £58.4m, this includes a deficit reserve on the DSG of £2.6m, therefore the gross value of reserves is £61.0m (as reported in Table 10 of the Q2 revenue and capital monitoring report, elsewhere on the agenda).
- 1.44 If the forecast in year overspend position does not change and requires a draw down from reserves in the region of £1.4m, this would reduce reserves further to £59.6m. However, on the basis of the £61.0m gross position and after accounting for specific earmarked reserves of £25.1m, this leaves the Councils remaining reserves at £35.9m as summarised at high level below:

• Total reserves earmarked (non-specific)	£9.8m
• Budget Planning Reserve	£16.1m
• General Fund balances	£10.0m
<b>Total</b>	<b>£35.9m</b>

- 1.45 At the end of the financial year, all reserves are reviewed including a focus on ear marked reserves to ensure they are still required for the purpose to which they are designated. The Interim Director of Finance and Assurance will report on the adequacy of the Council's reserves as required in the budget setting report in February 2024.
- 1.46 In addition to reserves there is an annual budgeted Contingency for Unforeseen items of £1.248m which sits within the Corporate budgets. As part of the budget setting for 2024/25 a one off use has been factored into the budget which reduces the figure by £175k for 2024/25 but it is reinstated at £1.248m for 2025/26 onwards.

## **LONDON BOROUGH GRANTS SCHEME**

- 1.47 Harrow's contribution to the London Borough Grant Scheme was £186,907 in 2023/24. At the time of writing this report, the Council has not been notified of the recommended contribution for 2024/25. To ensure that the Council can respond to London Councils when contribution rates are notified, it is recommended that Cabinet authorise the interim Director of Finance & Assurance to agree Harrow's 2024/25 contribution to the London Borough Grant Scheme, in consultation with the Portfolio Holder for Finance and Human Resources. The contribution for 2024/25 will be reported to Cabinet in February 2024 as part of the final budget.

## 2.0 CONSULTATION

2.1 As a matter of public law the duty to consult with regards to proposals to vary, reduce or withdraw services will arise in four circumstances:

- Where there is a statutory requirement in the relevant legislative framework.
- Where the practice has been to consult or where a policy document states the council will consult then the council must comply with its own practice or policy.
- Exceptionally, where the matter is so important that there is a legitimate expectation of consultation and.
- Where consultation is required to complete an equalities impact assessment.

2.2 Regardless of whether the council has a duty to consult, if it chooses to consult, such consultation must be carried out fairly. In general, a consultation can only be considered as proper consultation if:

- Comments are genuinely invited at the formative stage.
- The consultation documents include sufficient reasons for the proposal to allow those being consulted to be properly informed and to give an informed response.
- There is adequate time given to the consultees to consider the proposals;
- There is a mechanism for feeding back the comments and those comments are conscientiously taken into account by the decision maker / decision making body when making a final decision;
- The degree of specificity with which, in fairness, the public authority should conduct its consultation exercise may be influenced by the identity of those whom it is consulting and;
- The consultation is clear on the reasons and extent to which alternatives and discarded options have been considered.

2.3 Public consultation on the overall budget for 2024/25 will commence on 20 December 2023 and will last for a period of 5 weeks ending 24 January 2024 before the final budget is approved by Cabinet on 15 February and then recommended to Full Council on the 22 February 2024. The public consultation will give residents an opportunity to comment on the 2024/25 overall budget before final decisions are formalised in the council's annual budget. Other key stakeholders, including Union Representatives, local businesses, employees, and the Council Scrutiny function will also be fully consulted in the draft budget and MTFs before final approval. Once the consultation has closed then the cumulative equality impact assessment on the budget can be completed.

2.4 In terms of service specific consultations, the council has a duty to consult with residents and service users in several different situations including where proposals to significantly vary, reduce or withdraw services. Consultation is also needed in other circumstances, for example to identify the impact of proposals or to assist with complying with the council's equality duties. Council sets the budget envelope and Cabinet works within this.

Where appropriate, separate service specific consultations will take place for the 2024/25 savings and may be subject to a separate Cabinet report and Cabinet decisions as necessary.

- 2.5 Within Appendix 1A, there is a saving that is being reversed following separate consultation which concluded in October 2023. The saving of £6k per annum for each of the 3 years of the MTFS, was to be made by the cessation of Discretionary Freedom passes for new applicants. Having considered the feedback from the consultation, the Portfolio holder for Finance and Human Resources has decided not to implement the change and therefore the saving is reversed out of the budget.

### 3.0 PERFORMANCE ISSUES

- 3.1 In terms of financial performance, Cabinet is updated quarterly on forecast spend against the agreed budget and achievement of savings built into the budget. The same information is also presented to the Performance and Finance Scrutiny Sub Committee regularly throughout the year.

### 4.0 RISK MANAGEMENT IMPLICATIONS

- 4.1 Risks included on corporate or directorate risk register? Yes – Inability to deliver the Council’s MTFS is included in the Corporate Risk Register

Separate risk register in place? No

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

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

Risk Description	Mitigations	RAG Status
Inability to deliver the Council’s approved MTFS - over the next 3 years leading to an inability to set a balanced budget and provide core services	<ul style="list-style-type: none"> <li>• In-year Revenue &amp; Capital monitoring reported to CLT monthly, as well as the Portfolio Holder for Finance and HR, and Cabinet on a quarterly basis.</li> <li>• Budget challenge sessions held to tackle in year pressures in August and Sept 2023.</li> <li>• Savings are tracked on a monthly basis via the MTFS savings tracker</li> <li>• Budget for 2024/25 is balanced so the focus for attention is the 2025/26 and 2026/27 budget gaps.</li> </ul>	<b>RED</b>



<p>The draft budget and MTFS is based on the 2023/24 Financial Settlement, which was received in December 2022. The 2024/25 Finance settlement will not be announced until 19 December 2023, so there is still uncertainty in many of the numbers.</p>	<ul style="list-style-type: none"> <li>• Draft budget and MTFS based on most up to date information from London Councils and DHLUC based on prudent assumptions</li> <li>• The final budget will be prepared considering the Final Settlement. Any changes will have to comply with the legal requirement to set a balanced budget.</li> <li>• There is a contingency for unforeseen items (£1.248m) which is intended to support uncertainty</li> </ul>	<p><b>AMBER</b></p>
<p>Balanced budget for 2023/24 not achieved adversely impacting on the 2024/25 budget</p>	<ul style="list-style-type: none"> <li>• The 'Q2 Revenue and Capital Report' forecasts a net overspend of £1.4m. It is anticipated that this should reduce by year end as forecasts build in anticipated spend which may not happen.</li> <li>• The estimated impact of 2023/24 pressures into 2024/25 are accounted for in the draft budget and MTFS</li> <li>• There is a contingency for unforeseen items (£1.248m) which has not been called upon.</li> </ul>	<p><b>AMBER</b></p>

## 5.0 LEGAL IMPLICATIONS

- 5.1 Section 31A of the Local Government Finance Act 1992 requires billing authorities to calculate their council tax requirements in accordance with the prescribed requirements of that section. This requires consideration of the authority's estimated revenue expenditure for the year to perform its functions, allowances for contingencies in accordance with proper practices, financial reserves and amounts required to be transferred from general fund to collection fund.
- 5.2 Local authorities owe a fiduciary duty to council taxpayers, which means they must consider the prudent use of resources, including control of expenditure, financial prudence in the short and long term, the need to strike a fair balance between the interests of council taxpayers and ratepayers and the community's interest in adequate and efficient services and the need to act in good faith in relation to compliance with statutory duties and exercising statutory powers.
- 5.3 Cabinet is approving these proposals for consultation after which a cumulative equalities impact will be drafted. These proposals will be referred to Council so that Council can approve the budget envelope and set the Council Tax. There will be contingencies within the budget envelope so that

decision makers have some flexibility should any decisions have detrimental equalities impacts that cannot be mitigated.

Section 151 of the Local Government Act 1972 states that: “without prejudice to section 111, every local authority shall make arrangements for the proper administration of their financial affairs and shall secure that one of their officers has responsibility for the administration of those affairs”. Section 111 of the Local Government Act 1972 relates to the subsidiary powers of local authorities.

Under Section 114 of the Local Government Finance Act 1988, the chief finance officer (S151 Officer) of a relevant authority shall make a report under this section if it appears to them that the expenditure of the authority incurred (including expenditure it proposes to incur) in a financial year is likely to exceed the resources (including sums borrowed) available to it to meet that expenditure.

## **6.0 FINANCIAL IMPLICATIONS**

6.1 Financial Implications are integral to this report.

## **7.0 PROCUREMENT IMPLICATIONS**

7.1 There are no procurement implications arising from this report.

## **8.0 EQUALITIES IMPLICATIONS / PUBLIC SECTOR EQUALITY DUTY**

8.1 Decision makers should have due regard to the public sector equality duty in making their decisions. The equalities duties are continuing duties, they are not duties to secure a particular outcome. The equalities impact will be revisited on each of the proposals as they are developed. Consideration of the duties should precede the decision. It is important that Cabinet has regard to the statutory grounds in the light of all available material such as consultation responses. The statutory grounds of the public sector equality duty are found at section 149 of the Equality Act 2010 and are as follows:

*A public authority must, in the exercise of its functions, have due regard to the need to:*

- (a) eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act;*
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
- (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.*

*Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard to the need to:*

- (d) *remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;*
- (e) *take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;*
- (f) *Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.*  
*The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include steps to take account of disabled persons' disabilities.*

Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard; in particular, to the need to:

- (a) *Tackle prejudice, and*
- (b) *Promote understanding.*

*Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.*

*The relevant protected characteristics are:*

- *Age*
- *Disability*
- *Gender reassignment*
- *Pregnancy and maternity*
- *Race*
- *Religion or belief*
- *Sex*
- *Sexual orientation*
- *Marriage and Civil partnership*

- 8.2 Directorate proposals will be subject to an initial equalities impact assessment followed by a full assessment where appropriate. These will be published along with the final budget and MTFS report to February Cabinet. An assessment will also be carried out on the whole budget which will include any relevant information from the budget consultation, when all proposals have been identified, to ensure that decision makers are aware of any overall equalities impact on the protected characteristics listed above.

## **Council Priorities**

The Council's draft budget and MTFS for 2024/25 has been prepared in line with the Council's priorities:

1. A council that puts residents first
2. A borough that is clean and safe
3. A place where those in need are supported.

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

**Statutory Officer: Sharon Daniels**

Signed by the Chief Financial Officer

**Date: 27/11/2023**

**Statutory Officer: Jessica Farmer**

Signed by the Monitoring Officer

**Date: 07/12/2023**

**Chief Officer: Sharon Daniels**

Signed off on behalf of the Managing Director

**Date: 27/11/2023**

**Head of Procurement: Nimesh Mehta**

Signed by the Head of Procurement

**Date: 27/11/2023**

**Head of Internal Audit:**

Signed on behalf of the Head of Internal Audit

**Date: 27/11/2023**

## **Mandatory Checks**

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

**EqlA carried out: NO – to be reported as part of the February 2024 final budget report**

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

### **Papers**

**Contact:** Sharon Daniels – Interim Director of Finance & Assurance.  
Sharon.Daniels@harrow.gov.uk

**Background Papers: NONE**

**Call-in waived by the Chair of Overview and Scrutiny Committee: No**

Appendix 1A B1 Proposed savings/growth proposals - budget process 2024-25

ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals				EIA required Y/N?	Does this proposal impact on another directorate? Y/N	Further consultation with Key Stakeholders Yes/No/N/A
			2024-25	2025-26	2026-27	Total			
			£000	£000	£000	£000			
		<b>Savings Proposals</b>							
		<b>PLACE</b>							
PLACE 2024-25_S01	Community Engagement	<b>Removal of Ward Priority Fund budget</b> Ward Priority Fund (WPF) is an annual fund, allocated across the borough, available to support small-scale ward-level projects or initiatives that have community and councillor support. The fund is apportioned equally between Wards, with each Ward receiving £4,545, for Ward Members to apply. With the removal of WPF, ward members can still deliver projects using other funding such as Neighbourhood Community Infrastructure Levy (NCIL)	(100)			(100)	N	N	No
PLACE 2024-25_S02	Corporate Estates	<b>Review of leases and rent for corporate property portfolio</b>	(50)			(50)	N	N	No
PLACE 2024-25_S03	Planning Service	<b>Introduction of new Fees and Charges for tree documents.</b> To supply and charge for environmental information relating to Tree Preservation Orders (TPOs).	(10)			(10)	N	N	No
PLACE 2024-25_S04	Planning Service	<b>Review of Technical Support resources and future requirements</b> following the full implementation of the new planning software system	(38)	(76)		(114)	Y	N	Yes, staff consultation
PLACE 2024-25_S05	Directorate wide	<b>Place Directorate Restructure 2023</b> Following the approval of the restructuring proposal, total saving is estimated to be in the region of £500k. £250k has already been included in 23/24 MTFs, therefore an additional saving of £250k can be generated.		(200)		(200)	Y	N	Yes, staff consultation
PLACE 2024-25_S06	Corporate Estates	<b>Net reduction in Business Rates</b> following the closure of Civic Centre and the opening of the Harrow Council Hub	(250)			(250)	N	N	No
		<b>PLACE SAVINGS PROPOSALS</b>	<b>(448)</b>	<b>(276)</b>	<b>-</b>	<b>(724)</b>			
		<b>TOTAL SAVINGS PROPOSALS</b>	<b>(448)</b>	<b>(276)</b>	<b>-</b>	<b>(724)</b>			

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Appendix 1A B1 Proposed savings/growth proposals - budget process 2024-25

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ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals				EIA required Y/N?	Does this proposal impact on another directorate? Y/N	Further consultation with Key Stakeholders Yes/No/N/A
			2024-25	2025-26	2026-27	Total			
			£000	£000	£000	£000			
		<b>Growths Proposals</b>							
		<b>RESOURCES</b>							
RES1	Access Harrow	<b>Access Harrow</b> - Reversal of a previous saving relating to the closure of phone lines as the second part of the programme to reduce capacity within Revenues & Benefits was not progressed.	180			180			
RES2	Payroll Services	<b>Loss of income due to the cessation of schools payroll service.</b> Staff previously working on schools payroll service are retained to support the wider service. A one-off growth for 24/25 whilst efficiencies are being identified through the procurement of the Payroll system.	230	(230)		-			
		<b>RESOURCES GROWTH PROPOSALS</b>	<b>410</b>	<b>(230)</b>	<b>-</b>	<b>180</b>			
		<b>MANAGING DIRECTOR'S</b>				-			
MD1	Finance & Assurance	<b>Increase in External audit fees</b> as a result of procurement exercise by Public Sector Audit Appointments	250			250			
MD2	Finance & Assurance	<b>Rationalise the Discretionary Freedom Pass provision</b> - reversal of savings included in 23/24 MTFS. Following public consultation of the proposal, it was decided not to go ahead with this.	12	6		18			
MD3	Finance & Assurance	<b>Internal Audit &amp; Corporate Anit Audit Fraud Team</b> - Restructure to create sufficient capacity to delivery the service, following a review of current structure benchmarking exercise	260			260			
		<b>MANAGING DIRECTOR'S GROWTH PROPOSALS</b>	<b>522</b>	<b>6</b>	<b>-</b>	<b>528</b>			
		<b>PLACE</b>							
PLACE_2024-25_G01	Parking Services	<b>Parking Review</b> - Rephasing of the saving target in the MTFS (£1m) from 2024/25 to 2025/26	1,000	(1,000)		-			
PLACE_2024-25_G02	Parking Services	<b>Paid for Parking Income</b> - Income pressure for On Street and Car Park facilities across the borough	360			360			
PLACE_2024-25_G03	Planning Services	<b>Planning and Building Control application fees</b> Income pressures due to a reduction in application numbers	341			341			
PLACE_2024-25_G04	Clean & Green	<b>Street Cleaning</b> Additional investment to provide a more streamlined service and better ownership & accountability by the team.	250			250			

Appendix 1A B1 Proposed savings/growth proposals - budget process 2024-25

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ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals				EIA required Y/N?	Does this proposal impact on another directorate? Y/N	Further consultation with Key Stakeholders Yes/No/N/A
			2024-25	2025-26	2026-27	Total			
			£000	£000	£000	£000			
PLACE_2024-25_G05	Planning Services	<b>Local Plan Review</b> Additional support to the new Harrow Local Plan on Tall Buildings assessment, Views assessment, External Communications support an Kings Counsel representation at examination.	91	80	(171)	-			
PLACE_2024-25_G06	Planning Services	<b>Local Plan Review</b> Reversal of growth in 26/27 - budget provided in 2023/24 MTFS for 3 years only for additional staff resources required to complete Local Plan Review			(206)	(206)			
PLACE_2024-25_G07	Housing	<b>Homelessness demand pressures</b> - baseline pressure (assuming at current homelessness level) once the one-off grant reserve has been exhausted.		2,325		2,325			
PLACE_2024-25_G08	Housing	<b>Housing - Additional staff resource</b> to support additional work due to a considerable increase in the approaches and formal applications to the Housing Needs Services.	180	(180)		-			
PLACE_2024-25_G09	Waste Services	<b>Behavioural change (residents) for reducing waste disposal cost</b> - Original saving of £0.5m in 24/25. Rephasing of this over 2 years due to the delay in the recruitment of the recycling team. Communications plan and resident engagement to reduce waste and divert to recycling.	250	(250)		-			
		<b>PLACE GROWTH TOTAL</b>	<b>2,472</b>	<b>975</b>	<b>(377)</b>	<b>3,070</b>			
		<b>PEOPLE - ADULTS</b>							
ASC01	Placements	<b>Older Adults</b> - Increased budget for social care costs	1,955	2,000	2,000	5,955			
ASC02	Placements	<b>All Age Disabilities</b> - Increased budget for social care costs	2,920	-	-	2,920			
ASC03	Workforce	<b>All Age Disabilities</b> - Additional staffing requirements	77	-	-	77			
ASC04	Placements	<b>Community Equipment</b> - increased cost / volume for issues	115	-	-	115			
ASC05	Workforce	<b>Social Work Realignment</b> - to ensure consistency across Peoples in the grade costs for social work staff to support recruitment & retention	223	347	-	570			
ASC06	Workforce	<b>DoLS &amp; Safeguarding</b>	150	-	-	150			
ASC07	Placements	Assumed additional Market Sustainability Improvement Fund (MSIF) 2024/25	(828)			(828)			
ASC07	Placements	Permanent MSIF grant added to Adults base budget		828		828			
		<b>ADULTS GROWTH PROPOSALS</b>	<b>4,612</b>	<b>3,175</b>	<b>2,000</b>	<b>9,787</b>			

Appendix 1A B1 Proposed savings/growth proposals - budget process 2024-25

ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals				EIA required Y/N?	Does this proposal impact on another directorate? Y/N	Further consultation with Key Stakeholders Yes/No/N/A
			2024-25	2025-26	2026-27	Total			
			£000	£000	£000	£000			
		<b>PEOPLE - CHILDREN SERVICES</b>							
PCG01	Education Services	Education Services Staffing Proposals	100			100			
PCG02	CYPS	Reduction of PC01 2023-24 Growth for Children's Placements & Accommodation	(1,000)			(1,000)			
		<b>CHILDREN SERVICES GROWTH PROPOSALS</b>	<b>(900)</b>	<b>-</b>	<b>-</b>	<b>(900)</b>			
		<b>PEOPLE GROWTH TOTAL</b>	<b>3,712</b>	<b>3,175</b>	<b>2,000</b>	<b>8,887</b>			
		<b>TOTAL GROWTH</b>	<b>7,116</b>	<b>3,926</b>	<b>1,623</b>	<b>12,665</b>			
		<b>NET SAVINGS/GROWTH PROPOSALS</b>	<b>6,668</b>	<b>3,650</b>	<b>1,623</b>	<b>11,941</b>			



**Appendix 1B - Summary Savings and Growth from the 2022-23 & 2023-24 Budget Process**

	<b>2024-25</b>	<b>2025-26</b>	<b>Total</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
<b>Savings</b>			
Resources	(708)	(108)	<b>(816)</b>
Managing Director	(499)	(6)	<b>(505)</b>
Place	(3,775)	(300)	<b>(4,075)</b>
Adults	(1,989)	(295)	<b>(2,284)</b>
Childrens	(1,570)	(500)	<b>(2,070)</b>
Corporate/Council Wide			-
<b>Total Savings</b>	<b>(8,541)</b>	<b>(1,209)</b>	<b>(9,750)</b>
<b>Growth</b>			
Childrens	500	-	<b>500</b>
Corporate	250	-	<b>250</b>
<b>Total Growth</b>	<b>750</b>	-	<b>750</b>
<b>Net Total Savings and Growth</b>	<b>(7,791)</b>	<b>(1,209)</b>	<b>(9,000)</b>

Savings and growth proposals from the 2023-24 Budget Process

Appendix 1B

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Item No	ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals			EIA required Y/N	Does this proposal impact on another directorate? Y/N	Further Consultation with Key Stakeholders Yes/No/N/A
				2024-25	2025-26	Total			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
				£000	£000	£000			
			<b>Savings Proposals</b>						
			<b>Resources</b>						
1	RES L1	BSS	Reduction of the cost of post through digitalisation	-	-	-	N	Y	No
2	RES L2	IT	<b>Integrated Apps</b> - IT is in the process of agreeing a new corporate approach to management of business systems which are currently managed within departments. This new approach is expected to result in rationalisation and centralisation of budgets and deliver savings through reduction in contract spend.	(200)	-	(200)	N	N	No
3	RES 9	IT	<b>IT Expenditure review and consolidation this is a back office saving which is not expected to have an impact on residents.</b>	(100)	-	(100)	N	N	No
4	RES 12	Resources	<b>Redesign of Resources Directorate</b> - An exercise to redesign the Resources Directorate is currently underway. Although this is being driven to make sure that the Directorate is fit for purpose for the ongoing needs of the Council, it is also important to consider that one of these needs is to address affordability. This will be subject to HR procedures and consultaion and an Equality Impact Assesment.	(408)	(108)	(516)	Y	Y	Yes
			<b>RESOURCES SAVINGS PROPOSALS</b>	<b>(708)</b>	<b>(108)</b>	<b>(816)</b>			
			<b>Managing Director's</b>			-			
5	CEO 10	Registration Services	<b>Land Charges</b> - this savings relates to transfer to Land Registry of local land charges register that records obligations affecting properties within their administrative area	(100)		(100)	N	N	No
6	CEO 4	Revs & Benefits	<b>The Inflation Negating Scheme</b> for Working Age Households in receipt of Council Tax Support at the end of 2022/23 will be replaced with a one off cost of living grant for 2023/24. Harrow has previously used its discretionary powers to administer a local inflation negating scheme to ensure that working age recipients of council tax support were awarded additional relief to cover the Harrow council tax inflationary increases.	(310)	-	(310)	Y	N	No
7	CEO 2	Revs & Bens	<b>Rationalise the Discretionary Freedom Pass provision</b> - Currently Discretionary Freedom passes are issued to approximately 200 residents. The scheme will continue for existing users but will not be offered to new applicants from 1.04.2023. Subject to cabinet report, consultation and Equality Impact Assesment.(EQIA)  <i>Note: Following public consultation in 2023, the proposal is not to go ahead. These savings are reversed by growth included in Appendix 1a of the budget report.</i>	(6)	(6)	(12)	Y	N	Yes
8	CEO 8	Governance	<b>Efficiencies in legal and Governance</b>	(20)		(20)	N	N	Yes
9	CEO 9	Registration Services	<b>Registry Office</b> - saving relates to review of service operating model and staffing levels. Subject to EQIA and consultaion with staff and residents if required.	(63)		(63)	Y	N	Yes
			<b>MANAGING DIRECTOR'S SAVINGS PROPOSALS</b>	<b>(499)</b>	<b>(6)</b>	<b>(505)</b>			

Item No	ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals			EIA required Y/N	Does this proposal impact on another directorates? Y/N	Further Consultation with Key Stakeholders Yes/No/N/A
				2024-25	2025-26	Total			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
				£000	£000	£000			
			<b>People</b>						
			<b>Adults</b>						
10	ASC02	ASC	Freezing senior post in Adult social care. Statutory Director of Adults Social Care (DASS) role to be held by Corporate Director Peoples for six months	88	-	88	N	N	No
11	ASC03	ASC	Management Review during 2023/24 (all M grades & above) . HR procedures will be followed with consultaion and eqia	(60)	-	(60)	Y	N	Yes
12	ASC04	ASC	Review Adult Social Care pathway during 2023/24 (all G grades) HR procedures will be followed with consultaion and eqia. Will be subject to a separate cabinet decision.	(302)	-	(302)	Y	N	Yes
13	ASC06	NRC's	Neighbourhood Resource Centre (NRC) reprofiling (Kenmore & Vaughan) to provide the most complex support	(800)	-	(800)	Y	N	Yes
14	ASC07	NRC's	Public Health wellbeing support model - short term funding (2 years) to support the changes to the new NRC operating model	-	100	100	Y	N	No
15	ASC08	NRC's	Harrow Alliance Community Model (New Bentley). External utilisation and management of New Bentley by the third sector following appropriate procurement exercise	(220)	-	(220)	Y	N	Yes
16	ASC10	Health Funding	Use of Better Care Fund to protect of Social Care Services (via Better Care Fund) - uncommitted resources and 2% annual uplift allocated against existing social care expenditure	(145)	(145)	(290)	N	N	Yes
17	ASC11	CYAD	Review out of borough post 18 residential placements and provide alternative accommodation within Harrow to enable relocation back in borough. Placements equality impacts will be considered on an individual basis.	(250)	(250)	(500)	Y	Y	Yes
18	ASC12	Inhouse Residential	De-register Bedford House (20 bedded CQC registered residential unit) to provide supported living accommodation for the most complex & challenging. Subject to a separate cabinet report and EQIA.	(300)	-	(300)	Y	N	Yes
			<b>ADULTS TOTAL</b>	<b>(1,989)</b>	<b>(295)</b>	<b>(2,284)</b>			
			<b>Childrens</b>			-			
19	PC01	CYPS	<b>Placements &amp; Accommodation</b> Increased demand management - reduction in the cost of placements through reducing demand and stepping down young people into more cost effective provision where it is safe to do so	(500)	(500)	(1,000)	Y	Y	No
20	PC02	CYPS	<b>Social Care Staffing</b> HR policies will be followed. Service redesign delivering increased preventative models of care to reduce demand on formal care services resulting in reduction of management posts. Suhect to separate cabinet report and EQIA. HR policies will be followed	(1,070)		(1,070)	Y	N	Yes
			<b>CHILDRENS SERVICES TOTAL</b>	<b>(1,570)</b>	<b>(500)</b>	<b>(2,070)</b>			
			<b>PEOPLE SAVINGS PROPOSALS</b>	<b>(3,559)</b>	<b>(795)</b>	<b>(4,354)</b>			

Item No	ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals			EIA required Y/N	Does this proposal impact on another directorate? Y/N	Further Consultation with Key Stakeholders Yes/No/N/A
				2024-25	2025-26	Total			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
				£000	£000	£000			
			<b>PLACE</b>						
21	PLACE_S01	THAM & Parking	<b>Transport Strategy:</b> <b>Parking Charge Notices - Proposed move from Band B to Band A</b> , subject to endorsement by London Councils, the Mayor of London, and the Secretary of State for Transport. Subject to a separate decision. There are currently Band A and Band B charges for PCNs. Some London boroughs have moved to Band A while some are still in Band B (Harrow being one of them). The proposal is to move to Band A in order to support better compliance of traffic management.	(1,500)		<b>(1,500)</b>	Y	N	Yes
22	PLACE_S02	THAM & Parking	<b>Transport Strategy:</b> <b>Moving Traffic Contraventions (MTC) Review</b> - review of all MTCs in the borough and evaluate if they meet transport needs. The introduction of schemes including school streets and other measures following consultation from early 2023 including increasing ANPR / CCTV cameras. Schemes will be subject to a separate decision making process and consultation and EQIA as required.	(500)		<b>(500)</b>	Y	N	Yes
23	PLACE_S03	Waste Services	<b>Behavioural change (residents) for reducing waste disposal cost.</b> - Increase recycling / food waste to flats - Waste minimisation To invest in a recycling team to engage with and support residents on waste reduction and increased recycling through behavioural change on how to deal with waste.	(500)		<b>(500)</b>	N	N	No
24	PLACE_S06	THAM & Parking	<b>Transport Strategy:</b> Electric vehicle charging points - Increase installation using government funding (DfT) and supplier's match fund; and charge for the spaces. Concession contract. subject to a separate decision making process. Savings assume £3k per annum per bay, and a total of 100 bays following full roll out	(150)	(150)	<b>(300)</b>	Y	N	Yes



Item No	ref	Specific Service Area	Headline Description re: saving / reduction <b>INTERNAL</b>	Proposals			EIA required Y/N	Does this proposal impact on another directorate? Y/N	Further Consultation with Key Stakeholders Yes/No/N/A
				2024-25	2025-26	Total			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
				£000	£000	£000			
28		Education	<b>Reduction in Special Needs Transport growth</b> Growth was previously provided at £750k for 23/24 and £750k for 24/25 Appendix 1B. However following a review the full growth is not required. After these reductions of £550k and £250k this leaves £200k in 23/24 and £500k in 24/25 of the original growth.	(250)		(250)			
						-			
			<b>PEOPLE GROWTH TOTAL</b>	(250)	-	(250)			
			<b>CORPORATE</b>						
29	Corporate	Corporate	Inflationary Growth in relation to care provider inflation	250		250			
						-			
			<b>TOTAL CORPORATE GROWTH PROPOSALS</b>	250	-	250			
			<b>TOTAL GROWTH</b>	-	-	-			
			<b>NET SAVINGS/GROWTH PROPOSALS</b>	(8,541)	(1,209)	(9,750)			

Item No	ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals			EIA required Y/N	Does this proposal impact on another directorate? Y/N	Further Consultation with Key Stakeholders Yes/No/N/A
				2024-25	2025-26	Total			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
				£000	£000	£000			
<b><u>Savings and growth proposals from the 2022-23 Budget Process</u></b>									
			<b>Growths Proposals</b>						
			<b>People-Childrens</b>						
30		Education	Special Educational Needs Transport - . There are over 1,800 children and young people with Education Health & Care Plans (EHCPs) and approximately 40% of these are accessing SEN Transport. It is anticipated that the number of children and young people with EHCPs will increase to over 2,000 by 2023 which on the same ratio could mean a further 80 to 100 children requiring transport by 2023. It is estimated a further £750k pa will be required for each of the 3 years of the MTFS.	750		750			
			<b>PEOPLE GROWTH TOTAL</b>	<b>750</b>	<b>-</b>	<b>750</b>			
			<b>TOTAL SAVINGS PROPOSALS</b>	<b>(8,541)</b>	<b>(1,209)</b>	<b>(9,750)</b>			
			<b>TOTAL GROWTH</b>	<b>750</b>	<b>-</b>	<b>750</b>			
			<b>NET SAVINGS/GROWTH PROPOSALS</b>	<b>(7,791)</b>	<b>(1,209)</b>	<b>(9,000)</b>			

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**MEDIUM TERM FINANCIAL STRATEGY  
2024/25 to 2026/27**

**Appendix 2**

	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
<b>Budget Requirement Brought Forward</b>	196,354	203,416	207,476
Corporate & Technical	8,184	14,085	10,104
People	653	2,380	2,000
Place	-1,751	399	-377
Resources	-298	-338	0
Managing Director	23	0	0
Corporate	250	0	0
<b>Total</b>	<b>7,062</b>	<b>16,526</b>	<b>11,727</b>
<b>FUNDING GAP</b>	<b>0</b>	<b>-12,466</b>	<b>-6,732</b>
<b>Total Change in Budget Requirement</b>	<b>7,062</b>	<b>4,060</b>	<b>4,995</b>
<b>Revised Budget Requirement</b>	<b>203,416</b>	<b>207,476</b>	<b>212,471</b>
Collection Fund Deficit/-surplus	-790	0	0
Revenue Support Grant	-2,081	-2,081	-2,081
Top Up	-23,195	-23,195	-23,195
Retained Non Domestic Rates	-15,141	-15,141	-15,141
<b>Amount to be raised from Council Tax</b>	<b>162,208</b>	<b>167,059</b>	<b>172,054</b>
<b>Council Tax at Band D</b>	<b>£1,814.92</b>	<b>£1,869.19</b>	<b>£1,925.08</b>
<b>Increase in Council Tax (%)</b>	<b>4.99%</b>	<b>2.99%</b>	<b>2.99%</b>
Tax Base	89,375	89,375	89,375
	98.00%	98.00%	98.00%
Gross Tax Base	91,199	91,199	91,199

## MTFS 2024/25 to 2026/27 – Proposed investments / savings

Appendix 2

Technical Adjustments	2024/25	2025/26	2026/27
	£000	£000	£000
<b>Capital and Investment</b>			
Implications of Capital Programme agreed for 2020/21 to 2023/24			
Implications of Capital Programme agreed for 2021/22 to 2023/24 budget process	225		
25/26 Capital Programme costs from 22/23 refresh		1,747	
26/27 Capital Programme costs from 23/24 refresh			1,500
Capital Programme saving from 23/24 Review (£2.1m capital saving)	-182	92	-196
One off saving on Capital Financing costs due to underspends on Capital Programme	3,000		
Applying capital receipts to fund the Capital Programme	-1,300	-1,300	
Assume temporary savings on capital financing cost from slippage (one off)	-3,000	3,000	
Capital Receipts Flexibilities		1,250	
Assume Capital Receipts Flexibilities extended but on one-off basis		-1,250	1,250
<b>Total Capital and Investment Changes</b>	<b>-1,257</b>	<b>3,539</b>	<b>2,554</b>
<b>Grant Changes</b>			
Increase - Core Spending Grant	-6,000		
Reverse out £6m core grant	6,000		
December assumed no Services grant, but settlement confirmed continuation of services grant but at a reduced level. Figures only provided for 2023/24, therefore assume it will be halved in 2024/25 and then removed in 2025/26	770	771	
Social Care Grant - £12.807m allocation for 2023/24, less £7.720m base in 2022/23 less £300k ILF grant rolled in to social care	-2,035		
Adult Social care market sustainability grant and Improvements	-1,144		
- Adults Social Care Market sustainability grant & improvements (spend of 25%)	286		
IBCF (50% of the national allocation of £600m in 2023/24, increasing to £1bn by 2024/25)	-616		
IBCF contribution to pool	616		
Cost of Living Grant funded by Council Tax Support Fund (external grant)	310		
<b>Total Grant Changes</b>	<b>-1,813</b>	<b>771</b>	<b>0</b>
<b>Other Technical Changes</b>			
Freedom Passes - estimated reduction in usage (2022/23 process)			
Freedom Passes - revision to usage figures from London Council update (2022/23 process)	1,000		
Growth 24/25	2,322		
Growth 25/26		1,000	
November update on Freedom passes - improvement for 2023/24 and 2024/25 but worse in 2025/26. 2023/24 is still to be finalised.	-732	1,050	
<b>Use of Reserves</b>			
West London Waste Authority income from electricity - assume one-off income in 23/24	1,000		
West London Waste Authority income from electricity - assume income to continue for 2 more years	-1,000		1,000
<b>Total Other Technical Changes</b>	<b>2,590</b>	<b>2,050</b>	<b>1,000</b>
<b>Pay and Inflation</b>			
Pay Award @ 2.75% pa for 2023/24 and 2024/25	2,750		
Non Pay Inflation	1,000		
Pay award 2023/24 & 2024/25 - 4% / 2025/26 - 3%	1,250	3,000	
Pay award - Budget gap for 23/24 pay award	800		
Reduction of council wide growth 2024/25 to fund pay award	-755		
Pay award 2026/27 @ 3%			3,000
Non Pay Inflation - Additional £1m 2024/25, 2025/26 and 2026/27	1,000	1,000	1,000
<b>Total Pay and Price Inflation</b>	<b>6,045</b>	<b>4,000</b>	<b>4,000</b>
<b>OTHER</b>			
Gayton Road Income - Reprofiting of income	-11		
Growth London Living Wage	1,000		
- No LLW provision in 23/24 and reduced by 50% for 2024/25	-500	1,000	
Directorate growth	3,788		
Reverse out Directorate growth	-3,788		
Reverse Council wide Mgt saving	650		
Increase TM savings to offset Mgt saving - additional investment income being achieved	-650		
Council Tax Base increase	-500		
Council Tax Base increase	500	-250	-250

**MTFS 2024/25 to 2026/27 – Proposed investments / savings****Appendix 2**

<b>Technical Adjustments</b>			
	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
One off reduction of contingency budget	-175	175	
<b>Directorate Adjustments:</b>			
Adults care provider	1,550	1,800	1,800
General growth provision	1,000	1,000	1,000
Reduction in Council wide growth provision	-245		
<b>Total Corporate &amp; Technical</b>	<b>8,184</b>	<b>14,085</b>	<b>10,104</b>

**MTFS 2024/25 to 2026/27 – Proposed investments / savings**
**Appendix 2**

<b>People</b>			
	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
<b>Children &amp; Families</b>			
Proposed Savings - see appendix 1a	0	0	0
Proposed Growth - see appendix 1a	-900	0	0
Proposed Savings - see appendix 1b	-1,570	-500	
Proposed Growth - see appendix 1b	500	0	
<b>Sub total Children &amp; Families</b>	<b>-1,970</b>	<b>-500</b>	<b>0</b>
<b>Adults</b>			
Proposed Savings - see appendix 1a	0	0	0
Proposed Growth - see appendix 1a	4,612	3,175	2,000
Proposed Savings - see appendix 1b	-1,989	-295	
<b>Sub total Adults</b>	<b>2,623</b>	<b>2,880</b>	<b>2,000</b>
<b>Total People Directorate</b>	<b>653</b>	<b>2,380</b>	<b>2,000</b>

**MTFS 2024/25 to 2026/27 – Proposed investments / savings**
**Appendix 2**

<b>Place</b>			
	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
Proposed Savings - see appendix 1a	-448	-276	0
Proposed Growth - see appendix 1a	2,472	975	-377
Proposed Savings - see appendix 1b	-3,775	-300	
Proposed Growth - see appendix 1b	0	0	
<b>Total Place</b>	<b>-1,751</b>	<b>399</b>	<b>-377</b>

**MTFS 2024/25 to 2026/27 – Proposed investments / savings**
**Appendix 2**

<b>Resources</b>			
	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
Proposed Savings - see appendix 1a	0	0	0
Proposed Growth - see appendix 1a	410	-230	0
Proposed Savings - see appendix 1b	-708	-108	
Proposed Growth - see appendix 1b	0	0	
<b>Total Resources</b>	<b>-298</b>	<b>-338</b>	<b>0</b>

**MTFS 2024/25 to 2026/27 – Proposed investments / savings**

**Appendix 2**

<b>MANAGING DIRECTOR</b>			
	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
Proposed Savings - appendix 1a	0	0	0
Proposed Growth - appendix 1a	522	6	0
Proposed Savings - see appendix 1b	-499	-6	
Proposed Growth - see appendix 1b	0	0	
<b>Total Chief Executives</b>	<b>23</b>	<b>0</b>	<b>0</b>

**MTFS 2024/25 to 2026/27 – Proposed investments / savings**

**Appendix 2**

<b>CORPORATE</b>			
	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
Proposed Savings - appendix 1a	0	0	0
Proposed Growth - appendix 1a	0	0	0
Proposed Savings - see appendix 1b	0	0	
Proposed Growth - see appendix 1b	250	0	
<b>Total Corporate</b>	<b>250</b>	<b>0</b>	<b>0</b>



**Public Health Funding 2024-25****Appendix 3****Mandatory Services**

Sexual Health (incl Family Planning)	2,336	
0-19 Services	3,789	
Health Checks	185	
	<hr/>	6,310

**Discretionary Services**

Tobacco Control	104	
Drug & Alcohol Misuse	1,903	
Physical Activity	30	
	<hr/>	2,037

**Staffing & Support Costs**

Staffing	1,309	
Non-Staffing	28	
Overheads	163	
	<hr/>	1,500

Health Improvement	667	
Wider Determinants of Health	1,651	
	<hr/>	2,318
<b>Total Expenditure</b>		<hr/> <b>12,165</b> <hr/>

**Funded by**

Department of Health Grant	-12,165	
Contribution from Reserve		
<b>Total Income</b>		<b>-12,165</b>

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## School Budgets – Dedicated Schools Grant (DSG) 2024-25

### Introduction

1. The Dedicated Schools Grant (DSG) is a ring-fenced grant of which the majority is used to fund individual schools budgets in maintained schools and academies in Harrow. It also funds Early Years nursery entitlement for 2-, 3- and 4-year-olds in maintained council nursery classes and private, voluntary and independent (PVI) nurseries as well as provision for pupils with High Needs including those with Education Health & Care Plans (EHCPs) in special schools, special provision and mainstream schools in Harrow and out of borough. The DSG is split into four blocks: Schools Block, Central School Services Block, Early Years Block and High Needs Block.

### Schools Funding for 2024-25

2. In 2018-19 the government introduced a new National Funding Formula (NFF) for Schools, High Needs and the Central Schools services Block. For the Schools Block this means LAs are funded on the basis of the total of the NFF for all school, academies and free schools in its area. However, the final formula for distribution is determined by each Council following consultation with schools and Schools Forums.
3. The LA carried out a consultation in Autumn 2017 which sought views on whether the LA should continue to use the Harrow Schools Funding Formula or introduce the National Funding Formula from 2018-19. 76% of schools responded to the consultation and 89% voted in favour of introducing the NFF from 2018-19. This was approved by Cabinet in February 2018 and school budgets for the last five years have been set based on the NFF.
4. The NFF will therefore continue to be used to distributed school budgets for 2024-25.
5. From 2020 the government intended to implement the NFF in full which means that school allocations will be determined by the DfE rather than LAs. However, this has been delayed and there is no fixed date for this.
6. There are no proposed changes to the **structure** of the formula for 2024-25 however there are a number of changes for schools to be aware of.

### Changes in 2024-25

#### Increase in factor values

7. NFF Factor values have increased by:
  - 1.4% to basic entitlement, low prior attainment, FSM6, Income Deprivation Affecting Children Index (IDACI), English as an Additional Language (EAL) mobility and the lump sum.
  - 1.4% to the Minimum Per Pupil Levels (MPPL)

- 0.5% to the funding floor
- 1.6% to the Free School Meals (FSM) factor

8. The 2023-24 Mainstream Schools Additional Grant (MSAG) will be rolled into the NFF. Adjustments have been made to the NFF factor values to reflect this and are included in the figures below, as well as the factor value increases.

**Table 1 – funding formula factor values**

Factors	2023-24		2024-25		% Change	
	Pri	Sec	Pri	Sec	Pri	Sec
Pri AWPU	£3,740		£3,920		4.82%	
KS3 AWPU		£5,272		£5,527		5%
KS4 AWPU		£5,942		£6,230		5%
FSM	£529	£529	£539	£539	2%	2%
Ever6	£777	£1,135	£902	£1,321	16%	16%
IDACIF	£253	£369	£259	£374	2%	1%
IDACIE	£309	£490	£314	£495	2%	1%
IDACID	£485	£683	£490	£693	1%	1%
IDACIC	£529	£749	£534	£759	1%	1%
IDACIB	£562	£804	£567	£814	1%	1%
IDACIA	£738	£1,025	£748	£1,040	1%	1%
LPA	£1,273	£1,928	£1,288	£1,953	1%	1%
EAL	£639	£1,724	£649	£1,744	2%	1%
Mobility	£1,041	£1,499	£1,056	£1,519	1%	1%
Lump Sum	£141,039	£141,039	£147,902	£147,902	5%	5%

9. The Minimum Per-Pupil Funding Levels (MPPL) will be set at £4,610 for primary schools and £5,995 for secondary schools compared with £4,405 and £5,715 in 2023-24.
10. Teachers Pay Grant (TPG) and Teachers Pension Employers Contribution Grant (TPECG) are now fully rolled into the NFF.
11. Block transfers – LAs will continue to be able to transfer up to +0.5% of the schools block to other blocks of the DSG, with schools forum approval. A disapplication is required for transfers above 0.5% or for any amount where schools forum does not give approval.

### **Minimum Funding Guarantee (MFG)**

12. The MFG will continue and the allowable range for 2024-25 is between 0% and +0.5% which is the same as 2023-24
13. This means that each school could gain up to +0.5% *per pupil* compared with the 2023-24 budget. The final value of MFG will be determined by overall affordability within the formula.
14. Where schools are protected by MFG this means that they are receiving funding over and above that which is calculated by the NFF because of the levels of funding they

had been receiving prior to the introduction of the NFF. In future years if the MFG protection is removed then those schools who are funding above the NFF will see an immediate drop in funding from one year to the next.

### **Teacher's Pay Additional Grant (TPAG) 2023-24 and 2024-25**

15. In July 2023 the government announced the TPAG to support schools with the September 2023 teachers' pay award. Funding will be allocated to mainstream schools (5-16 age range), special and Alternative Provision schools. Funding will also be provided for eligible early years provision and 16 to 19 provision in mainstream schools

16. In 2023-24 funding will be for the period September 2023 to March 2024. The TPAG will continue into 2023-25 as a separate grant.

### **Central School Services Block**

17. The CSSB funds the following services:

- School Admissions
- Servicing of Schools Forum
- LA retained duties for schools and academies.

18. The indicative funding for 2024-25 is £1.509m.

### **Growth Fund**

19. Schools Forum agreed to continue to maintain a ring-fenced growth fund from the DSG in order to fund in-year pupil growth in relation to additional classes in maintained and academy schools to create additional classes at the LA's request.

### **High Needs Funding**

20. High Needs funding is designed to support a continuum of provision for pupils and students with special educational needs and disabilities (SEND) from 0-25 years old. The following are funded from the High Needs Block of the DSG:

- Harrow special schools and academies
- Additionally Resourced Mainstream (ARMs) units in mainstream schools
- Places in out of borough special schools and independent school provision
- EHCPs in mainstream schools and academies
- Post 16 provision including Further Education
- SEND Support services and support for inclusion
- Alternative provision including Pupil Referral Units and education other than at school

21. The government introduced a National Funding Formula for High Needs from 2018-19. Funding has previously been based on historical allocations plus small annual amounts of growth. In order to manage increasing growth for demand and complexity, annual funding transfer from the schools block into the high needs block have been approved by Schools Forum

22. From 2018-19 the Schools Block has been ring-fenced and transfers between blocks has been restricted to 0.5% of the Schools Block (approx. £970k). The decision to agree a transfer remains with Schools Forum. It agreed a transfer of 0.5% in 2018-19 and a reduced transfer of 0.25% in 2019-20 however it did not agree to any transfer beyond 2019-20 on the basis that the government should be properly addressing the inherent underfunding of High Needs pupils and to continue to top slice mainstream school budgets masks the extent of the problem.
23. There is anticipated to be an additional £1.3m added to the HNB for 2023-24 however there are already significant pressures on the HNB.
24. At the start of 2023-24 there is a cumulative overspend on the HNB of £2.623m and there is a further projected overspend in 2023-24 of £2.482m, taking the projected cumulative deficit on the HNB to £5.104m by March 2024.

### **DSG deficits**

25. The government consulted on the treatment of deficits in 2019. The outcome of the consultation was a change to the regulations for the treatment of DSG deficits so that LAs must carry forward any HNB deficit to be funded from the next year's budget share. It also explicitly states that LAs cannot and should not fund any DSG deficit from its own reserves.

### **DSG Management Plans**

26. A DSG management plan has been drafted however and discussed with Schools Forum. The SEND Strategy will also be brought to Cabinet for approval in Spring 2024 which will contain updated pupil and financial projections. However, the following points should be noted:
27. Despite the significant proposals and measures planned over the next ten years, this will not mitigate the deficit. This is due to the following contributory factors:
- historical underfunding
  - current budgets being based on historical budgets rather than historical spend
  - extension of age range to include 0-5 and post 19
  - current and projected formulaic funding which does not keep pace with demand
  - significant historical and projected growth in number of EHCPs
  - continued growth in complexity of pupils' needs
  - limitations about creating cost effective provision in borough due to capacity and site limitations

### **Early Years Funding**

28. Funding for Early Years relates to free 15-hour nursery entitlement for all 3- & 4-year-olds in maintained nurseries and nursery classes as well as private, voluntary and independent (PVI) provision. From September 2017 this was extended to 30-hour nursery entitlement for eligible 3- & 4-year-olds. It also funds free 15-hour nursery entitlement for disadvantaged 2-year-olds.

29. A National Funding Formula for Early Years was introduced in 2017-18. Cabinet approved the structure of the Harrow formula for the distribution of funding to providers in January 2018.
30. In 2023-24 there has also been an increase to the published funding rates for 2-, 3- and 4-year-old nursery provision for September 2023 to March 2024. This will be provided through the new Early Years Supplementary Grant (EYSG). This has been used to increase the hourly rates to LAs which in turn must be passed on to providers.
31. From 2024-25 the EYSG funding will be rolled into the Early Years Block of the DSG.
32. Funding rates and allocations will be announced in December 2023.

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**REPORT FOR: CABINET**

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<b>Date of Meeting:</b>	19 December 2023
<b>Subject:</b>	Draft Revenue Budget 2024/25 and draft Medium Term Financial Strategy to 2026/27
<b>Key Decision:</b>	Yes
<b>Responsible Officer:</b>	Sharon Daniels – Interim Director of Finance and Assurance (S151 Officer)
<b>Portfolio Holder:</b>	Councillor David Ashton – Portfolio Holder for Finance and Human Resources
<b>Exempt:</b>	No
<b>Wards affected:</b>	All
<b>Enclosures:</b>	<b>Appendix 1A</b> – Savings and Growth from 2024/25 Budget Process <b>Appendix 1B</b> – Savings and Growth from 2023/24 Budget Process <b>Appendix 2</b> - Medium Term Financial Strategy 2024/25 to 2026/27 <b>Appendix 3</b> – Draft Public Health Budget 2024/25 <b>Appendix 4</b> - Draft Schools Budget 2024/25

This report sets out the draft revenue budget for 2024/25 and draft Medium Term Financial Strategy (MTFS) to 2026/27. The budget and MTFS will be brought back to Cabinet in February 2024 for final approval and recommendation to Council.

**Recommendations:**

Cabinet is requested to:

- 1) Approve the draft budget for 2024/25 and the MTFS to 2026/27 for general consultation as set out in Appendices 1(A & B) and 2 so that Cabinet may later consider the budget including the consultation responses and the equality impact assessment (s), before it is referred to Council in February 2024.
- 2) Note the draft budget will be updated when the detail is announced in the Indicative Financial Settlement which is expected on 19 December followed by the Final Settlement in January 2024 (paragraph 1.07).
- 3) Note that, at draft budget stage, there remains an estimated budget gap of £0m for 2024/25, £12.466m for 2025/26 and £6.732m for 2026/27.
- 4) Note the proposal to increase core Council Tax by 2.99% in 2024/25, 2025/26 and 2026/27 (paragraph 1.19 and 1.21).
- 5) Note the proposal to increase Adult Social Care Precept Council Tax by 2% in 2024/25 and then by 0% per annum in 2025/26 and 2026/27 in respect of the Adult Social Care Precept (paragraph 1.19 and 1.21).
- 6) Approve the draft Public Health budget for 2024/25 as set out in Appendix 3.
- 7) Note there are no proposed structured changes to the schools funding formula for 2024/25 as set out in Appendix 4.
- 8) Note the assumed funding for the protection of social care 2024/25 through the Better Care Fund (paragraphs 1.38 to 1.41)
- 9) Authorise the Interim Director of Finance and Assurance, following consultation with the Portfolio Holder for Finance and Human Resources, to agree Harrow's 2024/25 contribution to the London Borough's Grant Scheme (paragraph 1.46).

Final approval will be sought from Cabinet and Council in February 2024.

**Reason: (For recommendations)**

To ensure that the Council publishes a draft budget for 2024/25 and a draft MTFS to 2026/27.

## **Section 2 – Report**

### **BACKGROUND**

- 1.01 Harrow remains one of the lowest funded Councils both within London and nationally. The Council does not benefit from large reserves compared with the rest of London and is in the lower end of the lower quartile for reserve balances held.
- 1.02 Over the past 10 years, the Council's revenue support grant has reduced from £50.5m to £2m in 2023/24 and whilst the Council does receive other grant funding to support services, these grants are all ring fenced to areas of activity and cannot be used to support the core budget, for example the Dedicated Schools Grant of £143m. In 2023/24 these grants total £366m.
- 1.03 The Council does not receive specific funding to meet demographic growth and demand led pressures. In addition, inflation has increased substantially, creating unfunded budget pressures.
- 1.04 In previous years, Council Tax has been increased to just below referendum limits and full use has been made of the Adults Social Care Precept, both of which were in line with central government expectations. The impact of this is that the Council is heavily reliant on Council Tax to fund its core budget. In 2023/24 approximately 78% of the Council's net revenue budget of £196.3m is funded from Council Tax.

### **SUMMARY**

- 1.05 The draft budget set out in this report shows an updated MTFS to the figures agreed by Council in February 2023. After all adjustments, the budget for 2024/25 is balanced, but there remain budget gaps of £12.466m and £6.732m over the two years of MTFS for 2025/26 and 2026/27.
- 1.06 It is important to note that for 2025/26 and 2026/27, many of the budget adjustments are estimated at a high level due to the challenges of forecasting complex issues such as inflation, demand, and demographics so far in advance. As the budget is approved annually, the latter two years of the MTFS will be subject to substantive review and adjustment before finally being approved.
- 1.07 The draft MTFS is based on the announcements made as part of the 2023/24 Finance Settlement (which covered 2023/24 and 2024/25) and will be updated further once the detail of the 2024/25 Local Government Provisional Financial Settlement is known, which is expected to be announced on 19 December 2023. Estimates have been based on the most up to date information known at the time of setting the draft MTFS. It is likely this position will change following the indicative settlement. This change could be for the better or worse. The final settlement is expected to be agreed by the end of January 2024.

## **AUTUMN STATEMENT 2023**

- 1.08 The Chancellor of the Exchequer, Jeremy Hunt, delivered the 2023 Autumn Statement on 22nd November 2023. As well as the usual updates on the state of public finances and the performance of the economy, the Chancellor organised his policies into five key areas: reducing debt; cutting tax and rewarding hard work; backing British business; building domestic and sustainable energy; and delivering world-class education.
- 1.09 The key policy announcements relating to public spending and local government are summarised below:

### **Local Government Funding**

- There was no new funding for 2024-25 for adult or children's social care or any general local government funding, beyond what was announced last year.

### **Housing and Homelessness**

- Local Housing Allowance rates will be raised to a level covering 30% of local market rents.
- Additional funding of £120m for homelessness prevention (UK-wide) in 2024-25. The details of the allocations are not yet known and therefore the Harrow allocation is still to be confirmed.
- Local Authority Housing Fund to be extended with a third round worth £450m to deliver new housing units and temporary accommodation for Afghan refugees.
- For the Housing Revenue Account, there is a rate extension of £5m to June 2025 of the Public Works Loan Board policy margin announced in Spring 2023.
- There are plans to allow local authorities to be able to fully recover the cost of planning fees for major planning applications if decisions are made within certain timelines.
- Local Planning Authorities to receive £32m to tackle planning backlogs.

### **Business Rates**

- The standard business rate multiplier will be increased by September CPI (6.7%) and the small business rate multiplier will be frozen for a fourth consecutive year.
- The 75% Retail, Hospitality and Leisure relief will be extended for 2024-25.
- Local authorities will be fully compensated for the loss of income because of these two measures and will receive new burdens funding for administrative and IT costs.

### **Local Government Pension Schemes**

- Reforms are anticipated to the Local Government Pension Scheme, including confirmation of guidance that will implement a 10% allocation ambition for investments in private equity, and establish a March 2025 deadline for the accelerated consolidation of LGPS assets into pools.

### **National Living Wage and Benefits**

- From April 2024, the National Living Wage will increase by 9.8% to £11.44 an hour and the age threshold lowered from 23 to 21 years old.
- The triple-lock for pensions will be continued (an increase of 8.5%) and benefits will increase in line with the September CPI (6.7%).

- 1.10 There have been no changes made to the MTFS as a result of the Autumn Statement as the detail of any funding changes for 2024/25 will be included in the Financial Settlement for Local Government, which is due around the 19 December 2023, as indicated above.

## **DELIVERY OF THE 2023/24 BUDGET**

- 1.11 Harrow has had a good track record of robust financial management and has not reported a revenue budget overspend for many years. The budget for 2022/23 was originally based on drawing down £14.7m of reserves to bring in a balanced position. The final position for 2022/23 improved significantly as a result of careful control and oversight of budgets, which meant that only £5.8m of reserves were needed (as opposed to £14.7m) to bring the budget into a balanced position.
- 1.12 Performance against the current 2023/24 revenue budget is detailed in a separate report on this agenda, 'Revenue and Capital Budget Monitoring Report 2023-24 Q2'. This report forecasts a net overspend of £1.379m as at 30<sup>th</sup> September 2023. If the position does not improve before year end it would be necessary to draw down this amount from the MTFS Budget Planning Reserve to bring in a balanced position, but it is anticipated that 2023/24 can be balanced with no draw down from reserves other than those already built into the budget.
- 1.13 In line with the national picture, the Council is being heavily impacted by inflation. Budget provision for pay inflation was £4m (4%). The 2023/24 pay award has recently been announced and it equated to an increase of 7% against the pay bill and has created a budget pressure of £3.2m. The bulk of this pressure has been funded from the general corporate budget and the non-pay inflation provision, but still leaves an £800k shortfall to be carried forward into 2024/25.
- 1.14 In addition, there are very substantial pressures on demand in adult services. Such is the scale of the demand, that across the 3 years of the MTFS from 2024/25 to 2026/27, a further £9.7m has been added in as a budget growth, as set out in Table 1.

## **BUDGET PROCESS 2024/25**

- 1.15 The Council has a statutory obligation to agree and publish the budget for 2024/25, and approval for this will be sought in February 2024. In preparing the 2024/25 budget and rolling forward the MTFS to cover the three-year period to 2026/27, the current MTFS has been the starting point for the process.
- 1.16 The Council's financial position and its operational environment has always been affected by several financial uncertainties and adjustments that impact upon its financial position over the short and medium term. In preparing the draft budget for 2024/25 the existing MTFS has been:
- Refreshed and rolled on a year into 2026/27
  - Updated to reflect the demand pressures as well as any opportunities and savings, plus council tax changes.
- 1.17 The adjustments are summarised in Table 1 below. Following Table 1 there is an explanation for the figures contained within the table. These adjustments are also set out in Appendix 2 along with adjustments included within the previous MTFS agreed as part of the 2023/24 Budget process. Table 1 shows budget gaps of £0m for 2024/25, £12.466m for 2025/26 and £6.732m for 2026/27.

Table 1: Changes to the MTFs (Prior to Indicative Settlement)			
	2024/25	2025/26	2026/27
	£'000	£'000	£'000
<b>Budget Gap (February 2023)</b>	<b>0</b>	<b>6,321</b>	<b>0</b>
Reversal out of Social Care Grant		6,822	
<b>Budget Gap (February 2023)</b>	<b>0</b>	<b>13,143</b>	<b>0</b>
<b>Council Tax Changes</b>			
Core CT @2.99%			-4,995
Increase 2024/25 by 1 % to 4.99%	-1,545		
Residual Tax Base Increase for 2024/25	-21		
Increase in CT base - 150 band D equivalents		-312	-250
Council Tax Collection Fund Surplus (one off)	-790	790	
<b>Grants and Technical Adjustments</b>			
Council Wide Growth			1,000
One off reduction of contingency	-175	175	
Assume Social Care Grant will remain with LA		-6822	
Assume that Capital Flexibilities will be extended on one off basis		-1250	1,250
Assume temporary savings on capital financing cost from slippage (one off)	-3000	3,000	
Reverse Council wide Mgt saving	650		
Increase TM savings to offset Mgt saving - additional investment income being achieved through improved investment returns	-650		
West London Waste Authority energy income (electricity)	-1000		1000
<b>Capital Programme Review</b>			
Resources - reduction of £600k in the Capital Programme. Therefore reducing capital financing cost in the revenue budget.	-34	92	-196
Place - reduction of £1.964m in the Capital Programme. Therefore reducing capital financing costs in the revenue budget.	-148		
2026/27 Capital Programme Cost			1,500
<b>Pay award 2023/24</b>			
£6.4m budget available. pay award £7.2m. Gap for 2023/24 pay award of £800k.	800		
Reduction of council wide growth 2024/25 to fund pay award	-755		
<b>Pay award 2024/25</b>			
£5.5m provision for pay and £1.0m for non pay - already assumed in the previous 2023/24 budget setting.			
<b>Pay award 2025/26</b>			
£5m provision for pay and £1m for non pay - already assumed in the previous 2023/24 budget setting.			
<b>Pay award 2026/27</b>			
Pay award @ 3%			3000
<b>Provision for Non Pay Inflation</b>			
Non Pay inflation provided for £1m in line with previous provisions.			1000
<b>Directorate Pressures plus Mitigations</b>			
<b>Resources and Managing Director</b>			
Resources - Access Harrow saving was not progressed as a result of a decision to keep the phone lines open for residents accessing the Revenues and Benefits service	180		
Managing Director (Finance and Assurance) - increase in external audit fees	250		
Managing Director (Finance and Assurance) - internal audit & CAFT	260		
Resources - one off budget for payroll staff ( staff previously working on schools payroll retained to work on general payroll)	230	-230	
Discretionary Freedom Pass - reversal of saving	12	6	
<b>People's Directorate</b>			
<b>Adults</b>			
Adults demand pressures (£9.787m over 3 years)	5440	2347	2000
Additional award of Market Sustainability and Improvement Fund (MSIF) grant for adults.	-828		
MSIF grant assumed as permanent grant but add to adults base for 2025/26		828	
Care Provider Inflation for Social care - in line with prior year allocations			1800
<b>Children's</b>			
Children's Placements & Accommodation budget - reduction of growth provided for placements in previous years - in 2023/24 £4.35m was provided and £1m of this is now being reversed.	-1000		
Growth in Education for staffing re: statutory duties	100		
<b>Place</b>			
Parking PCN 23/24 income shortfall - rephase £1m saving into 2025/26	1,000	-1000	
Parking P&D income shortfall	360		
Planning & Building Control income (£116k attributable to MTFs savings)	341		
Potential Homelessness demand pressure		2,325	
Housing staffing resource - one off requirement	180	-180	
Local Plan review	91	80	-171
Saving to reduce waste disposal costs through behavioural change (residents)			
Rephasing of £0.5m saving over 2 years	250	-250	
Additional Street Cleaning funding	250		
Local Plan Review -reversal of growth provided in 2024/25 and 2025/26			-206
Savings put forward in Appendix 1A	-448	-276	
<b>Revised Budget Gap after Risks and Opportunities</b>	<b>0</b>	<b>12,466</b>	<b>6,732</b>

## Council Tax and NNDR Changes

- 1.18 In 2023/24, despite an increase in Council tax of 4.99% which raised additional revenue of £7.8m (Council tax income increased from £146.2m to £154.0m), the cost of the 2023/24 pay award (only agreed in October 2023) is £7.2m and therefore, this left very little funding available for other demand pressures that have emerged in adult services and other inflationary pressures.
- 1.19 The assumed Council tax levels built into the MTFS agreed in February 2023 were based on 3.99% for 2023/24 and 2.99% for 2025/26. The changes made in Table 1 reflect an assumed Council tax of 2.99% in 2026/27 and an additional 1% assumed for 2024/25 which would take the increase from 3.99% to 4.99% for 2024/25. There is no change to the assumed 2.99% for 2025/26. This therefore provides for Council tax increases of 4.99%, 2.99% and 2.99% for the 3-year period 2024/25 to 2026/27.
- 1.20 In Table 1, the additional 1% in 2024/25 achieves additional income of £1.545m, whilst the original 3.99% achieves income of £6.144m. Therefore, the total council tax to be achieved from the 4.99% increase is £7.689m. The addition of 2.99% in 2026/27 provides £4.995m of council tax income in 2026/27.

In addition, the Council's tax base has been calculated, (according to the relevant procedures and guidance) at 89,375 band D equivalent properties, which is an increase of 290 Band D equivalents on the 2023/24 Band D of 89,085. This will generate additional income of £0.521m in 2024/25. Because £0.5m had already been included in the 2024/25 assumptions when the MTFS was set last year in Feb 2023, Table 1 only includes a further £21k. There are further tax base increases assumed for 2025/26 and 2026/27 and included in Table 1, which will be revisited as part of the 2025/26 budget process.

- 1.21 A maximum Council Tax increase of 4.99% is budgeted for 2024/25 in line with announcements made as part of the 2023/24 Finance settlement in December 2022. There is uncertainty as to whether the 2024/25 settlement will provide guidance as to the maximum level of Council Tax increase for 2025/26 and 2026/27 and for this reason, the working assumption has been left at 2.99% for both of these years.
- 1.22 The Autumn Statement 2023 is clear that the small business rates multiplier will be frozen in 2024/25 and local authorities will be fully compensated for any loss of income at the September CPI level of 6.7%. Freezing the multiplier means businesses will not see an increase in their bills and the Council will be compensated for this loss of inflationary income through the NNDR Multiplier Grant. However, due to revaluation losses in NNDR, there is no assumed increase in NNDR built into the budget for 2024/25 and this will be revisited following the announcement of the 2024/25 Finance settlement. Rateable value generally reduces annually in Harrow, this being a trend that has existed locally for several years.



- 1.23 The Collection Fund and its impact on the 2024/25 budget is subject to a separate report elsewhere on this agenda (Report: Estimated Surplus/(Deficit) on the Collection Fund 2023/24). The estimated impact on the 2023/24 Collection Fund is a surplus of £0.790m which must be accounted for as a one-off income against the 2024/25 budget and is included in Table 1.

### **Technical Changes**

- 1.24 A number of other adjustments have been included in Table 1 which are explained as follows:
- £1m of council wide growth in 2026/27 – this is a general allowance for growth as, other than for adults, there is no other departmental growth included.
  - £175k one off reduction of the contingency budget to balance the 2024/25 budget whilst awaiting the 2024/25 Finance settlement which could bring in some other opportunities to balance the budget.
  - In 2023/24, £6.822m of social care funding was awarded for 2 years and initially it was felt that it was possible that the grant might have to be used in 2025/26 for Social Care reform. Therefore, in arriving at the original budget gap of £13.143m in 2025/26, it had been assumed that the grant would be removed, resulting in an increase of the gap from £6.321m to £13.143m. It is now widely assumed that this grant will not be removed and therefore Table 1 reverses that assumption which improves the 2024/25 position by £6.822m.
  - Capital Flexibilities are assumed for a further year in 2025/26 which enables the Council to charge transformation costs to capital and thereby reduce the cost to the revenue budget. £1.25m is assumed for 2025/26 as a one-off basis.
  - Capital financing savings of £3m are assumed on a one-off basis as a result of slippage expected in the capital programme based on past experience.
  - Treasury Management savings of £650k are assumed in 2024/25 which will offset a previous saving not achieved in overall Management savings.
  - The Council has received some cash rebates from West London Waste Authority of £1.6m and £2.4m respectively in 2022/23 and 2023/24 as a result of energy income. The energy from waste facility generates electricity which then generates an income for the WLWA. A decision was made to reimburse a proportion of the energy income to the six constituent boroughs. Therefore, the budget assumes £1m for a further 2 years but then this is reversed out in 2026/27, since it cannot be assumed to continue indefinitely.
  - As a result of a review of the existing Capital Programme, it has been possible to remove some surplus capital budgets and therefore reducing capital financing costs by a net £286k across the MTFs period (-£182k 2024/25, £92k 2025/26 and -£196k 2026/27).

- The cost of the 2023/24 Capital Programme was approved as part of the 2023/24 budget setting process, but as the cost of £1.5m fell into 2026/27 which was last year outside of the MTFs period, the cost of £1.5m is now included.
- The pay award for 2023/24 has recently been agreed and cost £7.2m, an approximate 7% uplift against the pay bill. The 2023/24 budget included a provision of £4m and there were other budgets (non-pay inflation and corporate budgets) of £2.4m available to fund the pay award, which leaves an £800k shortfall that need to be built into the 2024/25 budget. To offset the pressure, a corporate growth budget of £755k is being reduced to fund it.
- In terms of 2024/25, 2025/26 and 2026/27, pay award budgets have been assumed of £5.5m, £5m and £3m respectively. Over the past few years, the pay awards have been agreed very late in the financial year and for both 2022/23 and 2023/24, the pay agreements have been reached around October time which makes it very difficult for budgeting purposes.
- Non pay inflation, which covers areas such as energy costs and contractual up lifts, is set at £1m pa in 2024/25 and 2025/26 and is increased by a further £1m for 2026/27.

### **Directorate Pressures/Savings**

1.25 The rest of the figures in Table 1 relate to Directorate pressures in the main, with a small number of savings which are detailed in Appendix 1A. As can be seen from Table 3 and Appendix 1A, there is growth of £6.7m, £3.6m and £1.6m built into the MTFs across the 3 years 2024/25 to 2026/27, which total £11.9m. Growth in the Adult social care budget accounts for £9.8m of the net growth.

1.26 After all the adjustments, the result is an estimated gap across the MTFs of £19.198m as follows:

2024/25 £0m  
 2025/26 £12.466m  
 2026/27 £6.732m

1.27 Between now and the Final Budget in February 2024, and further in 2024, the next steps are:

- Clarify the implications on the MTFs of the Indicative Financial Settlement when received in late December
- Continue to review/refine pressures, to reduce the impact of the gap in future years of 2025/26 and 2026/27.  
 Focus on efficiencies to reduce the impact of the gap in future years of the MTFs.

## Growth & Savings

- 1.28 Table 2 below summarises the savings and growth previously agreed as part of the 2023/24 budget process. This shows that there are net savings of £7.791m in 2024/25 and £1.209m in 2025/26. Therefore, total savings of £9.0m across the 2 years.

**Table 2: Savings and Growth from the 2023/24 Budget Process  
(Detail in Appendix 1B)**

	2024-25	2025-26	Total
	£000	£000	£000
<b>Savings</b>			
Resources	(708)	(108)	(816)
Managing Director	(499)	(6)	(505)
Place	(3,775)	(300)	(4,075)
Adults	(1,989)	(295)	(2,284)
Childrens	(1,570)	(500)	(2,070)
Corporate/Council Wide			-
<b>Total Savings</b>	<b>(8,541)</b>	<b>(1,209)</b>	<b>(9,750)</b>
<b>Growth</b>			
Childrens	500	-	500
Corporate	250	-	250
<b>Total Growth</b>	<b>750</b>	<b>-</b>	<b>750</b>
<b>Net Total Savings and Growth</b>	<b>(7,791)</b>	<b>(1,209)</b>	<b>(9,000)</b>

- 1.29 Table 3 summarises “new” growth and savings from the current 2024/25 budget setting process. This shows that there is net growth of £6.668m in 2024/25, £3.65m in 2025/26 and £1.623m in 2026/27. Therefore, this is net growth across the 3 years of £11.941m.

**Table 3: Savings and Growth from the 2024/25 Budget Process  
(Detail is set out in Appendix 1A)**

	2024-25	2025-26	2026-27	Total
	£000	£000	£000	£000
<b>Savings</b>				-
Place	(448)	(276)	-	(724)
<b>Total Savings</b>	<b>(448)</b>	<b>(276)</b>	<b>-</b>	<b>(724)</b>
<b>Growth</b>				
Resources	410	(230)	-	180
Managing Director	522	6	-	528
Place	2,472	975	(377)	3,070
Adults	4,612	3,175	2,000	9,787
Childrens	(900)	-	-	(900)
<b>Total Growth</b>	<b>7,116</b>	<b>3,926</b>	<b>1,623</b>	<b>12,665</b>
<b>Net Total Savings and Growth</b>	<b>6,668</b>	<b>3,650</b>	<b>1,623</b>	<b>11,941</b>

The summary information in the tables is supported by the details in appendices 1A and 1B.

## **CAPITAL RECEIPTS FLEXIBILITY**

- 1.30 In 2016 the government announced the Capital Receipts Flexibility Scheme to support local authorities to deliver more efficient and sustainable services by allowing them to spend up to 100% of their fixed assets receipts on the revenue costs of transformation projects. The flexibility has been extended on numerous occasions and is currently in place until 31 March 2025 but is likely to be extended and will be confirmed in the 19 December Finance settlement.
- 1.31 As part of the 2023/24 Budget process, the use of capital flexibilities was in place for 2023/24 and 2024/25 and then being reversed out in 2025/26. Table 1 assumes a continuation for a further year into 2025/26 but then is discontinued and the budget is reinstated for 2026/27. The MTFs includes a budget of £1.250m to fund the Regeneration Team. The nature of this spend meets the capital flexibility criteria and the team will be funded under the capital flexibilities scheme. The £1.250m provision is re-instated in 2026/27.

## **PUBLIC HEALTH FUNDING 2024/25**

- 1.32 In 2023/24 the total public health grant to local authorities totalled £3.529bn, with £12.007m being allocated to Harrow. The grant is ringfenced for use on public health functions exclusively for all ages of the population and must be spent in accordance with grant conditions on expenditure incurred by local authorities for the purposes of their public health functions, as specified in Section 73B (2) of the National Health Service Act 2006.
- 1.33 The draft Public Health commissioning intentions detailed in Appendix 3 are based on the indicative grant allocation for 2024-25 of £12.165m as advised by DHSC in March 2023 and indicate a 1.3% uplift, taking the total national funding for 2024-25 to £3.575bn. These commissioning intentions reflect alignment with the Health & Wellbeing Strategy, Borough Plan, and evidence of population priorities.
- 1.34 The Council consider that this level of funding enables the Council's overarching statutory duties (including equality duties) to be maintained, taking account of the joint strategic needs assessment. However, if additional duties are required by Councils, and if these were unfunded, the commissioning intentions would need to be reviewed in light of the allocated grant envelope.

## **SCHOOLS FUNDING FOR 2024/25**

- 1.35 In 2018/19 the government introduced a new National Funding Formula (NFF) for Schools, High Needs and the Central Schools services Block. For the Schools Block this means LAs are funded based on the total of the NFF for all schools, academies, and free schools in its area. However, the final formula for distribution is determined by each Council following consultation with schools and Schools Forums.

- 1.36 The LA carried out a consultation in Autumn 2017 which sought views on whether the LA should continue to use the Harrow Schools Funding Formula or introduce the National Funding Formula from 2018/19. 76% of schools responded to the consultation and 89% voted in favour of introducing the NFF from 2018/19. This was approved by Cabinet in February 2018 and school budgets for the last three years have been set based on the NFF.
- 1.37 The NFF will therefore continue to be used to distributed school budgets for 2024/25. There are no proposed changes to the structure of the formula for 2024/25 as detailed in Appendix 4. The proposed final funding formula and final DSG allocations will be reported to Cabinet in February 2024 for approval.

### **BETTER CARE FUND (BCF) 2024/25**

- 1.38 The framework for the Better Care Fund (BCF) derives from the government's mandate to the NHS which sets an objective for NHS England to ring fence funding to form the NHS contribution to the BCF. The NHS Long Term Plan, published in January 2019 set out the priorities for transformation and integration, including plans for investment in integrated community services and next steps to develop Integrated Care Systems.
- 1.39 The BCF continues to provide a mechanism for personalised, integrated approaches to health and care that support people to remain independent at home or to return to independence after a period in hospital. The continuation of the national conditions and requirements of the BCF provides opportunities for health and care partners to build on their plans to embed joint working and integrated care further, including how to work collaboratively to bring together funding streams to maximise the impact on outcomes for communities and sustaining vital community provision.
- 1.40 Following submission of the planning template covering the period 2023-2025 in August 2023, and assurance by NHS England, the 2024/25 Adults budget assumes that funding for the Protection of Social Care through the BCF will be £7.954m – an increase of 5.66% on the funding for 2023-24, reflecting the NHS funding commitments made within the spending review.
- 1.41 The total value of the Better Care Fund in Harrow for 2024-25 is £31.406m and includes a range of grants (including the Disabled Facilities and Adults Discharge Grants) and schemes across both Health and Social Care. The Better Care Fund Policy statement and Policy Framework and Planning Requirements will provide the detailed guidance when published in early 2024 (usually March). The requirements around integration and collaborative working are expected to continue.

### **RESERVES AND CONTINGENCIES**

- 1.42 Reserves and contingencies need to be considered in the context of their role to protect the Council's financial standing and in the context of the overall risks that the Council faces during a continuing period of economic uncertainty. The MTFs reflects the Council's need to ensure an adequate level of reserves and contingencies which will enable it to manage the risks

associated with delivery of the budget including equalities impacts and unforeseen events.

- 1.43 The Council's overall reserves position is reported to Cabinet quarterly as part of the revenue monitoring update. At quarter 2 (end of September 2023), total reserves forecast for carry forward into 2024/25 are £58.4m, this includes a deficit reserve on the DSG of £2.6m, therefore the gross value of reserves is £61.0m (as reported in Table 10 of the Q2 revenue and capital monitoring report, elsewhere on the agenda).
- 1.44 If the forecast in year overspend position does not change and requires a draw down from reserves in the region of £1.4m, this would reduce reserves further to £59.6m. However, on the basis of the £61.0m gross position and after accounting for specific earmarked reserves of £25.1m, this leaves the Councils remaining reserves at £35.9m as summarised at high level below:

• Total reserves earmarked (non-specific)	£9.8m
• Budget Planning Reserve	£16.1m
• General Fund balances	£10.0m
<b>Total</b>	<b>£35.9m</b>

- 1.45 At the end of the financial year, all reserves are reviewed including a focus on ear marked reserves to ensure they are still required for the purpose to which they are designated. The Interim Director of Finance and Assurance will report on the adequacy of the Council's reserves as required in the budget setting report in February 2024.
- 1.46 In addition to reserves there is an annual budgeted Contingency for Unforeseen items of £1.248m which sits within the Corporate budgets. As part of the budget setting for 2024/25 a one off use has been factored into the budget which reduces the figure by £175k for 2024/25 but it is reinstated at £1.248m for 2025/26 onwards.

## **LONDON BOROUGH GRANTS SCHEME**

- 1.47 Harrow's contribution to the London Borough Grant Scheme was £186,907 in 2023/24. At the time of writing this report, the Council has not been notified of the recommended contribution for 2024/25. To ensure that the Council can respond to London Councils when contribution rates are notified, it is recommended that Cabinet authorise the interim Director of Finance & Assurance to agree Harrow's 2024/25 contribution to the London Borough Grant Scheme, in consultation with the Portfolio Holder for Finance and Human Resources. The contribution for 2024/25 will be reported to Cabinet in February 2024 as part of the final budget.

## 2.0 CONSULTATION

2.1 As a matter of public law the duty to consult with regards to proposals to vary, reduce or withdraw services will arise in four circumstances:

- Where there is a statutory requirement in the relevant legislative framework.
- Where the practice has been to consult or where a policy document states the council will consult then the council must comply with its own practice or policy.
- Exceptionally, where the matter is so important that there is a legitimate expectation of consultation and.
- Where consultation is required to complete an equalities impact assessment.

2.2 Regardless of whether the council has a duty to consult, if it chooses to consult, such consultation must be carried out fairly. In general, a consultation can only be considered as proper consultation if:

- Comments are genuinely invited at the formative stage.
- The consultation documents include sufficient reasons for the proposal to allow those being consulted to be properly informed and to give an informed response.
- There is adequate time given to the consultees to consider the proposals;
- There is a mechanism for feeding back the comments and those comments are conscientiously taken into account by the decision maker / decision making body when making a final decision;
- The degree of specificity with which, in fairness, the public authority should conduct its consultation exercise may be influenced by the identity of those whom it is consulting and;
- The consultation is clear on the reasons and extent to which alternatives and discarded options have been considered.

2.3 Public consultation on the overall budget for 2024/25 will commence on 20 December 2023 and will last for a period of 5 weeks ending 24 January 2024 before the final budget is approved by Cabinet on 15 February and then recommended to Full Council on the 22 February 2024. The public consultation will give residents an opportunity to comment on the 2024/25 overall budget before final decisions are formalised in the council's annual budget. Other key stakeholders, including Union Representatives, local businesses, employees, and the Council Scrutiny function will also be fully consulted in the draft budget and MTFs before final approval. Once the consultation has closed then the cumulative equality impact assessment on the budget can be completed.

2.4 In terms of service specific consultations, the council has a duty to consult with residents and service users in several different situations including where proposals to significantly vary, reduce or withdraw services. Consultation is also needed in other circumstances, for example to identify the impact of proposals or to assist with complying with the council's equality duties. Council sets the budget envelope and Cabinet works within this.

Where appropriate, separate service specific consultations will take place for the 2024/25 savings and may be subject to a separate Cabinet report and Cabinet decisions as necessary.

- 2.5 Within Appendix 1A, there is a saving that is being reversed following separate consultation which concluded in October 2023. The saving of £6k per annum for each of the 3 years of the MTFS, was to be made by the cessation of Discretionary Freedom passes for new applicants. Having considered the feedback from the consultation, the Portfolio holder for Finance and Human Resources has decided not to implement the change and therefore the saving is reversed out of the budget.

### 3.0 PERFORMANCE ISSUES

- 3.1 In terms of financial performance, Cabinet is updated quarterly on forecast spend against the agreed budget and achievement of savings built into the budget. The same information is also presented to the Performance and Finance Scrutiny Sub Committee regularly throughout the year.

### 4.0 RISK MANAGEMENT IMPLICATIONS

- 4.1 Risks included on corporate or directorate risk register? Yes – Inability to deliver the Council’s MTFS is included in the Corporate Risk Register

Separate risk register in place? No

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

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

Risk Description	Mitigations	RAG Status
Inability to deliver the Council’s approved MTFS - over the next 3 years leading to an inability to set a balanced budget and provide core services	<ul style="list-style-type: none"> <li>• In-year Revenue &amp; Capital monitoring reported to CLT monthly, as well as the Portfolio Holder for Finance and HR, and Cabinet on a quarterly basis.</li> <li>• Budget challenge sessions held to tackle in year pressures in August and Sept 2023.</li> <li>• Savings are tracked on a monthly basis via the MTFS savings tracker</li> <li>• Budget for 2024/25 is balanced so the focus for attention is the 2025/26 and 2026/27 budget gaps.</li> </ul>	<b>RED</b>



<p>The draft budget and MTFS is based on the 2023/24 Financial Settlement, which was received in December 2022. The 2024/25 Finance settlement will not be announced until 19 December 2023, so there is still uncertainty in many of the numbers.</p>	<ul style="list-style-type: none"> <li>• Draft budget and MTFS based on most up to date information from London Councils and DHLUC based on prudent assumptions</li> <li>• The final budget will be prepared considering the Final Settlement. Any changes will have to comply with the legal requirement to set a balanced budget.</li> <li>• There is a contingency for unforeseen items (£1.248m) which is intended to support uncertainty</li> </ul>	<p><b>AMBER</b></p>
<p>Balanced budget for 2023/24 not achieved adversely impacting on the 2024/25 budget</p>	<ul style="list-style-type: none"> <li>• The 'Q2 Revenue and Capital Report' forecasts a net overspend of £1.4m. It is anticipated that this should reduce by year end as forecasts build in anticipated spend which may not happen.</li> <li>• The estimated impact of 2023/24 pressures into 2024/25 are accounted for in the draft budget and MTFS</li> <li>• There is a contingency for unforeseen items (£1.248m) which has not been called upon.</li> </ul>	<p><b>AMBER</b></p>

## 5.0 LEGAL IMPLICATIONS

- 5.1 Section 31A of the Local Government Finance Act 1992 requires billing authorities to calculate their council tax requirements in accordance with the prescribed requirements of that section. This requires consideration of the authority's estimated revenue expenditure for the year to perform its functions, allowances for contingencies in accordance with proper practices, financial reserves and amounts required to be transferred from general fund to collection fund.
- 5.2 Local authorities owe a fiduciary duty to council taxpayers, which means they must consider the prudent use of resources, including control of expenditure, financial prudence in the short and long term, the need to strike a fair balance between the interests of council taxpayers and ratepayers and the community's interest in adequate and efficient services and the need to act in good faith in relation to compliance with statutory duties and exercising statutory powers.
- 5.3 Cabinet is approving these proposals for consultation after which a cumulative equalities impact will be drafted. These proposals will be referred to Council so that Council can approve the budget envelope and set the Council Tax. There will be contingencies within the budget envelope so that

decision makers have some flexibility should any decisions have detrimental equalities impacts that cannot be mitigated.

Section 151 of the Local Government Act 1972 states that: “without prejudice to section 111, every local authority shall make arrangements for the proper administration of their financial affairs and shall secure that one of their officers has responsibility for the administration of those affairs”. Section 111 of the Local Government Act 1972 relates to the subsidiary powers of local authorities.

Under Section 114 of the Local Government Finance Act 1988, the chief finance officer (S151 Officer) of a relevant authority shall make a report under this section if it appears to them that the expenditure of the authority incurred (including expenditure it proposes to incur) in a financial year is likely to exceed the resources (including sums borrowed) available to it to meet that expenditure.

## **6.0 FINANCIAL IMPLICATIONS**

6.1 Financial Implications are integral to this report.

## **7.0 PROCUREMENT IMPLICATIONS**

7.1 There are no procurement implications arising from this report.

## **8.0 EQUALITIES IMPLICATIONS / PUBLIC SECTOR EQUALITY DUTY**

8.1 Decision makers should have due regard to the public sector equality duty in making their decisions. The equalities duties are continuing duties, they are not duties to secure a particular outcome. The equalities impact will be revisited on each of the proposals as they are developed. Consideration of the duties should precede the decision. It is important that Cabinet has regard to the statutory grounds in the light of all available material such as consultation responses. The statutory grounds of the public sector equality duty are found at section 149 of the Equality Act 2010 and are as follows:

*A public authority must, in the exercise of its functions, have due regard to the need to:*

- (a) eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act;*
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
- (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.*

*Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard to the need to:*

- (d) *remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;*
- (e) *take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;*
- (f) *Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.*  
*The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include steps to take account of disabled persons' disabilities.*

Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard; in particular, to the need to:

- (a) *Tackle prejudice, and*
- (b) *Promote understanding.*

*Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.*

*The relevant protected characteristics are:*

- *Age*
- *Disability*
- *Gender reassignment*
- *Pregnancy and maternity*
- *Race*
- *Religion or belief*
- *Sex*
- *Sexual orientation*
- *Marriage and Civil partnership*

- 8.2 Directorate proposals will be subject to an initial equalities impact assessment followed by a full assessment where appropriate. These will be published along with the final budget and MTFS report to February Cabinet. An assessment will also be carried out on the whole budget which will include any relevant information from the budget consultation, when all proposals have been identified, to ensure that decision makers are aware of any overall equalities impact on the protected characteristics listed above.

## **Council Priorities**

The Council's draft budget and MTFS for 2024/25 has been prepared in line with the Council's priorities:

1. A council that puts residents first
2. A borough that is clean and safe
3. A place where those in need are supported.

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

**Statutory Officer: Sharon Daniels**

Signed by the Chief Financial Officer

**Date: 27/11/2023**

**Statutory Officer: Jessica Farmer**

Signed by the Monitoring Officer

**Date: 07/12/2023**

**Chief Officer: Sharon Daniels**

Signed off on behalf of the Managing Director

**Date: 27/11/2023**

**Head of Procurement: Nimesh Mehta**

Signed by the Head of Procurement

**Date: 27/11/2023**

**Head of Internal Audit:**

Signed on behalf of the Head of Internal Audit

**Date: 27/11/2023**

## **Mandatory Checks**

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

**EqlA carried out: NO – to be reported as part of the February 2024 final budget report**

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

### **Papers**

**Contact:** Sharon Daniels – Interim Director of Finance & Assurance.  
Sharon.Daniels@harrow.gov.uk

**Background Papers: NONE**

**Call-in waived by the Chair of Overview and Scrutiny Committee: No**

Appendix 1A B1 Proposed savings/growth proposals - budget process 2024-25

ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals				EIA required Y/N?	Does this proposal impact on another directorate? Y/N	Further consultation with Key Stakeholders Yes/No/N/A
			2024-25	2025-26	2026-27	Total			
			£000	£000	£000	£000			
		<b>Savings Proposals</b>							
		<b>PLACE</b>							
PLACE 2024-25_S01	Community Engagement	<b>Removal of Ward Priority Fund budget</b> Ward Priority Fund (WPF) is an annual fund, allocated across the borough, available to support small-scale ward-level projects or initiatives that have community and councillor support. The fund is apportioned equally between Wards, with each Ward receiving £4,545, for Ward Members to apply. With the removal of WPF, ward members can still deliver projects using other funding such as Neighbourhood Community Infrastructure Levy (NCIL)	(100)			(100)	N	N	No
PLACE 2024-25_S02	Corporate Estates	<b>Review of leases and rent for corporate property portfolio</b>	(50)			(50)	N	N	No
PLACE 2024-25_S03	Planning Service	<b>Introduction of new Fees and Charges for tree documents.</b> To supply and charge for environmental information relating to Tree Preservation Orders (TPOs).	(10)			(10)	N	N	No
PLACE 2024-25_S04	Planning Service	<b>Review of Technical Support resources and future requirements</b> following the full implementation of the new planning software system	(38)	(76)		(114)	Y	N	Yes, staff consultation
PLACE 2024-25_S05	Directorate wide	<b>Place Directorate Restructure 2023</b> Following the approval of the restructuring proposal, total saving is estimated to be in the region of £500k. £250k has already been included in 23/24 MTFS, therefore an additional saving of £250k can be generated.		(200)		(200)	Y	N	Yes, staff consultation
PLACE 2024-25_S06	Corporate Estates	<b>Net reduction in Business Rates</b> following the closure of Civic Centre and the opening of the Harrow Council Hub	(250)			(250)	N	N	No
		<b>PLACE SAVINGS PROPOSALS</b>	<b>(448)</b>	<b>(276)</b>	<b>-</b>	<b>(724)</b>			
		<b>TOTAL SAVINGS PROPOSALS</b>	<b>(448)</b>	<b>(276)</b>	<b>-</b>	<b>(724)</b>			

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Appendix 1A B1 Proposed savings/growth proposals - budget process 2024-25

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ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals				EIA required Y/N?	Does this proposal impact on another directorate? Y/N	Further consultation with Key Stakeholders Yes/No/N/A
			2024-25	2025-26	2026-27	Total			
			£000	£000	£000	£000			
		<b>Growths Proposals</b>							
		<b>RESOURCES</b>							
RES1	Access Harrow	<b>Access Harrow</b> - Reversal of a previous saving relating to the closure of phone lines as the second part of the programme to reduce capacity within Revenues & Benefits was not progressed.	180			180			
RES2	Payroll Services	<b>Loss of income due to the cessation of schools payroll service.</b> Staff previously working on schools payroll service are retained to support the wider service. A one-off growth for 24/25 whilst efficiencies are being identified through the procurement of the Payroll system.	230	(230)		-			
		<b>RESOURCES GROWTH PROPOSALS</b>	410	(230)	-	180			
		<b>MANAGING DIRECTOR'S</b>				-			
MD1	Finance & Assurance	<b>Increase in External audit fees</b> as a result of procurement exercise by Public Sector Audit Appointments	250			250			
MD2	Finance & Assurance	<b>Rationalise the Discretionary Freedom Pass provision</b> - reversal of savings included in 23/24 MTFS. Following public consultation of the proposal, it was decided not to go ahead with this.	12	6		18			
MD3	Finance & Assurance	<b>Internal Audit &amp; Corporate Anit Audit Fraud Team</b> - Restructure to create sufficient capacity to delivery the service, following a review of current structure benchmarking exercise	260			260			
		<b>MANAGING DIRECTOR'S GROWTH PROPOSALS</b>	522	6	-	528			
		<b>PLACE</b>							
PLACE_2024-25_G01	Parking Services	<b>Parking Review</b> - Rephasing of the saving target in the MTFS (£1m) from 2024/25 to 2025/26	1,000	(1,000)		-			
PLACE_2024-25_G02	Parking Services	<b>Paid for Parking Income</b> - Income pressure for On Street and Car Park facilities across the borough	360			360			
PLACE_2024-25_G03	Planning Services	<b>Planning and Building Control application fees</b> Income pressures due to a reduction in application numbers	341			341			
PLACE_2024-25_G04	Clean & Green	<b>Street Cleaning</b> Additional investment to provide a more streamlined service and better ownership & accountability by the team.	250			250			

Appendix 1A B1 Proposed savings/growth proposals - budget process 2024-25

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ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals				EIA required Y/N?	Does this proposal impact on another directorate? Y/N	Further consultation with Key Stakeholders Yes/No/N/A
			2024-25	2025-26	2026-27	Total			
			£000	£000	£000	£000			
PLACE_2024-25_G05	Planning Services	<b>Local Plan Review</b> Additional support to the new Harrow Local Plan on Tall Buildings assessment, Views assessment, External Communications support an Kings Counsel representation at examination.	91	80	(171)	-			
PLACE_2024-25_G06	Planning Services	<b>Local Plan Review</b> Reversal of growth in 26/27 - budget provided in 2023/24 MTFS for 3 years only for additional staff resources required to complete Local Plan Review			(206)	(206)			
PLACE_2024-25_G07	Housing	<b>Homelessness demand pressures</b> - baseline pressure (assuming at current homelessness level) once the one-off grant reserve has been exhausted.		2,325		2,325			
PLACE_2024-25_G08	Housing	<b>Housing - Additional staff resource</b> to support additional work due to a considerable increase in the approaches and formal applications to the Housing Needs Services.	180	(180)		-			
PLACE_2024-25_G09	Waste Services	<b>Behavioural change (residents) for reducing waste disposal cost</b> - Original saving of £0.5m in 24/25. Rephasing of this over 2 years due to the delay in the recruitment of the recycling team. Communications plan and resident engagement to reduce waste and divert to recycling.	250	(250)		-			
		<b>PLACE GROWTH TOTAL</b>	<b>2,472</b>	<b>975</b>	<b>(377)</b>	<b>3,070</b>			
		<b>PEOPLE - ADULTS</b>							
ASC01	Placements	<b>Older Adults</b> - Increased budget for social care costs	1,955	2,000	2,000	5,955			
ASC02	Placements	<b>All Age Disabilities</b> - Increased budget for social care costs	2,920	-	-	2,920			
ASC03	Workforce	<b>All Age Disabilities</b> - Additional staffing requirements	77	-	-	77			
ASC04	Placements	<b>Community Equipment</b> - increased cost / volume for issues	115	-	-	115			
ASC05	Workforce	<b>Social Work Realignment</b> - to ensure consistency across Peoples in the grade costs for social work staff to support recruitment & retention	223	347	-	570			
ASC06	Workforce	<b>DoLS &amp; Safeguarding</b>	150	-	-	150			
ASC07	Placements	Assumed additional Market Sustainability Improvement Fund (MSIF) 2024/25	(828)			(828)			
ASC07	Placements	Permanent MSIF grant added to Adults base budget		828		828			
		<b>ADULTS GROWTH PROPOSALS</b>	<b>4,612</b>	<b>3,175</b>	<b>2,000</b>	<b>9,787</b>			

Appendix 1A B1 Proposed savings/growth proposals - budget process 2024-25

ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals				EIA required Y/N?	Does this proposal impact on another directorate? Y/N	Further consultation with Key Stakeholders Yes/No/N/A
			2024-25	2025-26	2026-27	Total			
			£000	£000	£000	£000			
		<b>PEOPLE - CHILDREN SERVICES</b>							
PCG01	Education Services	Education Services Staffing Proposals	100			100			
PCG02	CYPS	Reduction of PC01 2023-24 Growth for Children's Placements & Accommodation	(1,000)			(1,000)			
		<b>CHILDREN SERVICES GROWTH PROPOSALS</b>	<b>(900)</b>	<b>-</b>	<b>-</b>	<b>(900)</b>			
		<b>PEOPLE GROWTH TOTAL</b>	<b>3,712</b>	<b>3,175</b>	<b>2,000</b>	<b>8,887</b>			
		<b>TOTAL GROWTH</b>	<b>7,116</b>	<b>3,926</b>	<b>1,623</b>	<b>12,665</b>			
		<b>NET SAVINGS/GROWTH PROPOSALS</b>	<b>6,668</b>	<b>3,650</b>	<b>1,623</b>	<b>11,941</b>			



**Appendix 1B - Summary Savings and Growth from the 2022-23 & 2023-24 Budget Process**

	<b>2024-25</b>	<b>2025-26</b>	<b>Total</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
<b>Savings</b>			
Resources	(708)	(108)	<b>(816)</b>
Managing Director	(499)	(6)	<b>(505)</b>
Place	(3,775)	(300)	<b>(4,075)</b>
Adults	(1,989)	(295)	<b>(2,284)</b>
Childrens	(1,570)	(500)	<b>(2,070)</b>
Corporate/Council Wide			-
<b>Total Savings</b>	<b>(8,541)</b>	<b>(1,209)</b>	<b>(9,750)</b>
<b>Growth</b>			
Childrens	500	-	<b>500</b>
Corporate	250	-	<b>250</b>
<b>Total Growth</b>	<b>750</b>	-	<b>750</b>
<b>Net Total Savings and Growth</b>	<b>(7,791)</b>	<b>(1,209)</b>	<b>(9,000)</b>

Savings and growth proposals from the 2023-24 Budget Process

Appendix 1B

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Item No	ref	Specific Service Area	Headline Description re: saving / reduction <b>INTERNAL</b>	Proposals			EIA required Y/N	Does this proposal impact on another directorate? Y/N	Further Consultation with Key Stakeholders Yes/No/N/A
				2024-25	2025-26	Total			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
				£000	£000	£000			
			<b>Savings Proposals</b>						
			<b>Resources</b>						
1	RES L1	BSS	Reduction of the cost of post through digitalisation	-	-	-	N	Y	No
2	RES L2	IT	<b>Integrated Apps</b> - IT is in the process of agreeing a new corporate approach to management of business systems which are currently managed within departments. This new approach is expected to result in rationalisation and centralisation of budgets and deliver savings through reduction in contract spend.	(200)	-	(200)	N	N	No
3	RES 9	IT	<b>IT Expenditure review and consolidation this is a back office saving which is not expected to have an impact on residents.</b>	(100)	-	(100)	N	N	No
4	RES 12	Resources	<b>Redesign of Resources Directorate</b> - An exercise to redesign the Resources Directorate is currently underway. Although this is being driven to make sure that the Directorate is fit for purpose for the ongoing needs of the Council, it is also important to consider that one of these needs is to address affordability. This will be subject to HR procedures and consultaion and an Equality Impact Assesment.	(408)	(108)	(516)	Y	Y	Yes
			<b>RESOURCES SAVINGS PROPOSALS</b>	<b>(708)</b>	<b>(108)</b>	<b>(816)</b>			
			<b>Managing Director's</b>			-			
5	CEO 10	Registration Services	<b>Land Charges</b> - this savings relates to transfer to Land Registry of local land charges register that records obligations affecting properties within their administrative area	(100)		(100)	N	N	No
6	CEO 4	Revs & Benefits	<b>The Inflation Negating Scheme</b> for Working Age Households in receipt of Council Tax Support at the end of 2022/23 will be replaced with a one off cost of living grant for 2023/24. Harrow has previously used its discretionary powers to administer a local inflation negating scheme to ensure that working age recipients of council tax support were awarded additional relief to cover the Harrow council tax inflationary increases.	(310)	-	(310)	Y	N	No
7	CEO 2	Revs & Bens	<b>Rationalise the Discretionary Freedom Pass provision</b> - Currently Discretionary Freedom passes are issued to approximately 200 residents. The scheme will continue for existing users but will not be offered to new applicants from 1.04.2023. Subject to cabinet report, consultation and Equality Impact Assesment.(EQIA)  <i>Note: Following public consultation in 2023, the proposal is not to go ahead. These savings are reversed by growth included in Appendix 1a of the budget report.</i>	(6)	(6)	(12)	Y	N	Yes
8	CEO 8	Governance	<b>Efficiencies in legal and Governance</b>	(20)		(20)	N	N	Yes
9	CEO 9	Registration Services	<b>Registry Office</b> - saving relates to review of service operating model and staffing levels. Subject to EQIA and consultaion with staff and residents if required.	(63)		(63)	Y	N	Yes
			<b>MANAGING DIRECTOR'S SAVINGS PROPOSALS</b>	<b>(499)</b>	<b>(6)</b>	<b>(505)</b>			

Item No	ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals			EIA required Y/N	Does this proposal impact on another directorates? Y/N	Further Consultation with Key Stakeholders Yes/No/N/A
				2024-25	2025-26	Total			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
				£000	£000	£000			
			<b>People</b>						
			<b>Adults</b>						
10	ASC02	ASC	Freezing senior post in Adult social care. Statutory Director of Adults Social Care (DASS) role to be held by Corporate Director Peoples for six months	88	-	88	N	N	No
11	ASC03	ASC	Management Review during 2023/24 (all M grades & above) . HR procedures will be followed with consultaion and eqia	(60)	-	(60)	Y	N	Yes
12	ASC04	ASC	Review Adult Social Care pathway during 2023/24 (all G grades) HR procedures will be followed with consultaion and eqia. Will be subject to a separate cabinet decision.	(302)	-	(302)	Y	N	Yes
13	ASC06	NRC's	Neighbourhood Resource Centre (NRC) reprofiling (Kenmore & Vaughan) to provide the most complex support	(800)	-	(800)	Y	N	Yes
14	ASC07	NRC's	Public Health wellbeing support model - short term funding (2 years) to support the changes to the new NRC operating model	-	100	100	Y	N	No
15	ASC08	NRC's	Harrow Alliance Community Model (New Bentley). External utilisation and management of New Bentley by the third sector following appropriate procurement exercise	(220)	-	(220)	Y	N	Yes
16	ASC10	Health Funding	Use of Better Care Fund to protect of Social Care Services (via Better Care Fund) - uncommitted resources and 2% annual uplift allocated against existing social care expenditure	(145)	(145)	(290)	N	N	Yes
17	ASC11	CYAD	Review out of borough post 18 residential placements and provide alternative accommodation within Harrow to enable relocation back in borough. Placements equality impacts will be considered on an individual basis.	(250)	(250)	(500)	Y	Y	Yes
18	ASC12	Inhouse Residential	De-register Bedford House (20 bedded CQC registered residential unit) to provide supported living accommodation for the most complex & challenging. Subject to a separate cabinet report and EQIA.	(300)	-	(300)	Y	N	Yes
			<b>ADULTS TOTAL</b>	<b>(1,989)</b>	<b>(295)</b>	<b>(2,284)</b>			
			<b>Childrens</b>			-			
19	PC01	CYPS	<b>Placements &amp; Accommodation</b> Increased demand management - reduction in the cost of placements through reducing demand and stepping down young people into more cost effective provision where it is safe to do so	(500)	(500)	(1,000)	Y	Y	No
20	PC02	CYPS	<b>Social Care Staffing</b> HR policies will be followed. Service redesign delivering increased preventative models of care to reduce demand on formal care services resulting in reduction of management posts. Suhect to separate cabinet report and EQIA. HR policies will be followed	(1,070)		(1,070)	Y	N	Yes
			<b>CHILDRENS SERVICES TOTAL</b>	<b>(1,570)</b>	<b>(500)</b>	<b>(2,070)</b>			
			<b>PEOPLE SAVINGS PROPOSALS</b>	<b>(3,559)</b>	<b>(795)</b>	<b>(4,354)</b>			

Item No	ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals			EIA required Y/N	Does this proposal impact on another directorate? Y/N	Further Consultation with Key Stakeholders Yes/No/N/A
				2024-25	2025-26	Total			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
				£000	£000	£000			
			<b>PLACE</b>						
21	PLACE_S01	THAM & Parking	<b>Transport Strategy:</b> <b>Parking Charge Notices - Proposed move from Band B to Band A</b> , subject to endorsement by London Councils, the Mayor of London, and the Secretary of State for Transport. Subject to a separate decision. There are currently Band A and Band B charges for PCNs. Some London boroughs have moved to Band A while some are still in Band B (Harrow being one of them). The proposal is to move to Band A in order to support better compliance of traffic management.	(1,500)		<b>(1,500)</b>	Y	N	Yes
22	PLACE_S02	THAM & Parking	<b>Transport Strategy:</b> <b>Moving Traffic Contraventions (MTC) Review</b> - review of all MTCs in the borough and evaluate if they meet transport needs. The introduction of schemes including school streets and other measures following consultation from early 2023 including increasing ANPR / CCTV cameras. Schemes will be subject to a separate decision making process and consultation and EQIA as required.	(500)		<b>(500)</b>	Y	N	Yes
23	PLACE_S03	Waste Services	<b>Behavioural change (residents) for reducing waste disposal cost.</b> - Increase recycling / food waste to flats - Waste minimisation To invest in a recycling team to engage with and support residents on waste reduction and increased recycling through behavioural change on how to deal with waste.	(500)		<b>(500)</b>	N	N	No
24	PLACE_S06	THAM & Parking	<b>Transport Strategy:</b> Electric vehicle charging points - Increase installation using government funding (DfT) and supplier's match fund; and charge for the spaces. Concession contract. subject to a separate decision making process. Savings assume £3k per annum per bay, and a total of 100 bays following full roll out	(150)	(150)	<b>(300)</b>	Y	N	Yes



Item No	ref	Specific Service Area	Headline Description re: saving / reduction <b>INTERNAL</b>	Proposals			EIA required Y/N	Does this proposal impact on another directorate? Y/N	Further Consultation with Key Stakeholders Yes/No/N/A
				2024-25	2025-26	Total			
				(4)	(5)	(6)			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
				£000	£000	£000			
28		Education	<b>Reduction in Special Needs Transport growth</b> Growth was previously provided at £750k for 23/24 and £750k for 24/25 Appendix 1B. However following a review the full growth is not required. After these reductions of £550k and £250k this leaves £200k in 23/24 and £500k in 24/25 of the original growth.	(250)		(250)			
						-			
			<b>PEOPLE GROWTH TOTAL</b>	(250)	-	(250)			
			<b>CORPORATE</b>						
29	Corporate	Corporate	Inflationary Growth in relation to care provider inflation	250		250			
						-			
			<b>TOTAL CORPORATE GROWTH PROPOSALS</b>	250	-	250			
			<b>TOTAL GROWTH</b>	-	-	-			
			<b>NET SAVINGS/GROWTH PROPOSALS</b>	(8,541)	(1,209)	(9,750)			

Item No	ref	Specific Service Area	Headline Description re: saving / reduction INTERNAL	Proposals			EIA required Y/N	Does this proposal impact on another directorate? Y/N	Further Consultation with Key Stakeholders Yes/No/N/A
				2024-25	2025-26	Total			
				(4)	(5)	(6)			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
				£000	£000	£000			
<b><u>Savings and growth proposals from the 2022-23 Budget Process</u></b>									
			<b>Growths Proposals</b>						
			<b>People-Childrens</b>						
30		Education	Special Educational Needs Transport - . There are over 1,800 children and young people with Education Health & Care Plans (EHCPs) and approximately 40% of these are accessing SEN Transport. It is anticipated that the number of children and young people with EHCPs will increase to over 2,000 by 2023 which on the same ratio could mean a further 80 to 100 children requiring transport by 2023. It is estimated a further £750k pa will be required for each of the 3 years of the MTFS.	750		750			
			<b>PEOPLE GROWTH TOTAL</b>	<b>750</b>	<b>-</b>	<b>750</b>			
			<b>TOTAL SAVINGS PROPOSALS</b>	<b>(8,541)</b>	<b>(1,209)</b>	<b>(9,750)</b>			
			<b>TOTAL GROWTH</b>	<b>750</b>	<b>-</b>	<b>750</b>			
			<b>NET SAVINGS/GROWTH PROPOSALS</b>	<b>(7,791)</b>	<b>(1,209)</b>	<b>(9,000)</b>			

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**MEDIUM TERM FINANCIAL STRATEGY  
2024/25 to 2026/27**

**Appendix 2**

	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
<b>Budget Requirement Brought Forward</b>	196,354	203,416	207,476
Corporate & Technical	8,184	14,085	10,104
People	653	2,380	2,000
Place	-1,751	399	-377
Resources	-298	-338	0
Managing Director	23	0	0
Corporate	250	0	0
<b>Total</b>	<b>7,062</b>	<b>16,526</b>	<b>11,727</b>
<b>FUNDING GAP</b>	<b>0</b>	<b>-12,466</b>	<b>-6,732</b>
<b>Total Change in Budget Requirement</b>	<b>7,062</b>	<b>4,060</b>	<b>4,995</b>
<b>Revised Budget Requirement</b>	<b>203,416</b>	<b>207,476</b>	<b>212,471</b>
Collection Fund Deficit/-surplus	-790	0	0
Revenue Support Grant	-2,081	-2,081	-2,081
Top Up	-23,195	-23,195	-23,195
Retained Non Domestic Rates	-15,141	-15,141	-15,141
<b>Amount to be raised from Council Tax</b>	<b>162,208</b>	<b>167,059</b>	<b>172,054</b>
<b>Council Tax at Band D</b>	<b>£1,814.92</b>	<b>£1,869.19</b>	<b>£1,925.08</b>
<b>Increase in Council Tax (%)</b>	<b>4.99%</b>	<b>2.99%</b>	<b>2.99%</b>
Tax Base	89,375	89,375	89,375
	98.00%	98.00%	98.00%
Gross Tax Base	91,199	91,199	91,199

## MTFS 2024/25 to 2026/27 – Proposed investments / savings

Appendix 2

Technical Adjustments	2024/25	2025/26	2026/27
	£000	£000	£000
<b>Capital and Investment</b>			
Implications of Capital Programme agreed for 2020/21 to 2023/24			
Implications of Capital Programme agreed for 2021/22 to 2023/24 budget process	225		
25/26 Capital Programme costs from 22/23 refresh		1,747	
26/27 Capital Programme costs from 23/24 refresh			1,500
Capital Programme saving from 23/24 Review (£2.1m capital saving)	-182	92	-196
One off saving on Capital Financing costs due to underspends on Capital Programme	3,000		
Applying capital receipts to fund the Capital Programme	-1,300	-1,300	
Assume temporary savings on capital financing cost from slippage (one off)	-3,000	3,000	
Capital Receipts Flexibilities		1,250	
Assume Capital Receipts Flexibilities extended but on one-off basis		-1,250	1,250
<b>Total Capital and Investment Changes</b>	<b>-1,257</b>	<b>3,539</b>	<b>2,554</b>
<b>Grant Changes</b>			
Increase - Core Spending Grant	-6,000		
Reverse out £6m core grant	6,000		
December assumed no Services grant, but settlement confirmed continuation of services grant but at a reduced level. Figures only provided for 2023/24, therefore assume it will be halved in 2024/25 and then removed in 2025/26	770	771	
Social Care Grant - £12.807m allocation for 2023/24, less £7.720m base in 2022/23 less £300k ILF grant rolled in to social care	-2,035		
Adult Social care market sustainability grant and Improvements	-1,144		
- Adults Social Care Market sustainability grant & improvements (spend of 25%)	286		
IBCF (50% of the national allocation of £600m in 2023/24, increasing to £1bn by 2024/25)	-616		
IBCF contribution to pool	616		
Cost of Living Grant funded by Council Tax Support Fund (external grant)	310		
<b>Total Grant Changes</b>	<b>-1,813</b>	<b>771</b>	<b>0</b>
<b>Other Technical Changes</b>			
Freedom Passes - estimated reduction in usage (2022/23 process)			
Freedom Passes - revision to usage figures from London Council update (2022/23 process)	1,000		
Growth 24/25	2,322		
Growth 25/26		1,000	
November update on Freedom passes - improvement for 2023/24 and 2024/25 but worse in 2025/26. 2023/24 is still to be finalised.	-732	1,050	
<b>Use of Reserves</b>			
West London Waste Authority income from electricity - assume one-off income in 23/24	1,000		
West London Waste Authority income from electricity - assume income to continue for 2 more years	-1,000		1,000
<b>Total Other Technical Changes</b>	<b>2,590</b>	<b>2,050</b>	<b>1,000</b>
<b>Pay and Inflation</b>			
Pay Award @ 2.75% pa for 2023/24 and 2024/25	2,750		
Non Pay Inflation	1,000		
Pay award 2023/24 & 2024/25 - 4% / 2025/26 - 3%	1,250	3,000	
Pay award - Budget gap for 23/24 pay award	800		
Reduction of council wide growth 2024/25 to fund pay award	-755		
Pay award 2026/27 @ 3%			3,000
Non Pay Inflation - Additional £1m 2024/25, 2025/26 and 2026/27	1,000	1,000	1,000
<b>Total Pay and Price Inflation</b>	<b>6,045</b>	<b>4,000</b>	<b>4,000</b>
<b>OTHER</b>			
Gayton Road Income - Reprofiting of income	-11		
Growth London Living Wage	1,000		
- No LLW provision in 23/24 and reduced by 50% for 2024/25	-500	1,000	
Directorate growth	3,788		
Reverse out Directorate growth	-3,788		
Reverse Council wide Mgt saving	650		
Increase TM savings to offset Mgt saving - additional investment income being achieved	-650		
Council Tax Base increase	-500		
Council Tax Base increase	500	-250	-250

**MTFS 2024/25 to 2026/27 – Proposed investments / savings****Appendix 2**

<b>Technical Adjustments</b>			
	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
One off reduction of contingency budget	-175	175	
<b>Directorate Adjustments:</b>			
Adults care provider	1,550	1,800	1,800
General growth provision	1,000	1,000	1,000
Reduction in Council wide growth provision	-245		
<b>Total Corporate &amp; Technical</b>	<b>8,184</b>	<b>14,085</b>	<b>10,104</b>

**MTFS 2024/25 to 2026/27 – Proposed investments / savings**
**Appendix 2**

<b>People</b>			
	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
<b>Children &amp; Families</b>			
Proposed Savings - see appendix 1a	0	0	0
Proposed Growth - see appendix 1a	-900	0	0
Proposed Savings - see appendix 1b	-1,570	-500	
Proposed Growth - see appendix 1b	500	0	
<b>Sub total Children &amp; Families</b>	<b>-1,970</b>	<b>-500</b>	<b>0</b>
<b>Adults</b>			
Proposed Savings - see appendix 1a	0	0	0
Proposed Growth - see appendix 1a	4,612	3,175	2,000
Proposed Savings - see appendix 1b	-1,989	-295	
<b>Sub total Adults</b>	<b>2,623</b>	<b>2,880</b>	<b>2,000</b>
<b>Total People Directorate</b>	<b>653</b>	<b>2,380</b>	<b>2,000</b>

**MTFS 2024/25 to 2026/27 – Proposed investments / savings**
**Appendix 2**

<b>Place</b>			
	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
Proposed Savings - see appendix 1a	-448	-276	0
Proposed Growth - see appendix 1a	2,472	975	-377
Proposed Savings - see appendix 1b	-3,775	-300	
Proposed Growth - see appendix 1b	0	0	
<b>Total Place</b>	<b>-1,751</b>	<b>399</b>	<b>-377</b>

**MTFS 2024/25 to 2026/27 – Proposed investments / savings**
**Appendix 2**

<b>Resources</b>			
	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
Proposed Savings - see appendix 1a	0	0	0
Proposed Growth - see appendix 1a	410	-230	0
Proposed Savings - see appendix 1b	-708	-108	
Proposed Growth - see appendix 1b	0	0	
<b>Total Resources</b>	<b>-298</b>	<b>-338</b>	<b>0</b>

**MTFS 2024/25 to 2026/27 – Proposed investments / savings**

**Appendix 2**

<b>MANAGING DIRECTOR</b>			
	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
Proposed Savings - appendix 1a	0	0	0
Proposed Growth - appendix 1a	522	6	0
Proposed Savings - see appendix 1b	-499	-6	
Proposed Growth - see appendix 1b	0	0	
<b>Total Chief Executives</b>	<b>23</b>	<b>0</b>	<b>0</b>

**MTFS 2024/25 to 2026/27 – Proposed investments / savings**

**Appendix 2**

<b>CORPORATE</b>			
	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>
Proposed Savings - appendix 1a	0	0	0
Proposed Growth - appendix 1a	0	0	0
Proposed Savings - see appendix 1b	0	0	
Proposed Growth - see appendix 1b	250	0	
<b>Total Corporate</b>	<b>250</b>	<b>0</b>	<b>0</b>



**Public Health Funding 2024-25****Appendix 3****Mandatory Services**

Sexual Health (incl Family Planning)	2,336	
0-19 Services	3,789	
Health Checks	185	
	<hr/>	6,310

**Discretionary Services**

Tobacco Control	104	
Drug & Alcohol Misuse	1,903	
Physical Activity	30	
	<hr/>	2,037

**Staffing & Support Costs**

Staffing	1,309	
Non-Staffing	28	
Overheads	163	
	<hr/>	1,500

Health Improvement	667	
Wider Determinants of Health	1,651	
	<hr/>	2,318
		<hr/>
<b>Total Expenditure</b>		<b>12,165</b>

**Funded by**

Department of Health Grant	-12,165	
Contribution from Reserve		
<b>Total Income</b>		<b>-12,165</b>

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## School Budgets – Dedicated Schools Grant (DSG) 2024-25

### Introduction

1. The Dedicated Schools Grant (DSG) is a ring-fenced grant of which the majority is used to fund individual schools budgets in maintained schools and academies in Harrow. It also funds Early Years nursery entitlement for 2-, 3- and 4-year-olds in maintained council nursery classes and private, voluntary and independent (PVI) nurseries as well as provision for pupils with High Needs including those with Education Health & Care Plans (EHCPs) in special schools, special provision and mainstream schools in Harrow and out of borough. The DSG is split into four blocks: Schools Block, Central School Services Block, Early Years Block and High Needs Block.

### Schools Funding for 2024-25

2. In 2018-19 the government introduced a new National Funding Formula (NFF) for Schools, High Needs and the Central Schools services Block. For the Schools Block this means LAs are funded on the basis of the total of the NFF for all school, academies and free schools in its area. However, the final formula for distribution is determined by each Council following consultation with schools and Schools Forums.
3. The LA carried out a consultation in Autumn 2017 which sought views on whether the LA should continue to use the Harrow Schools Funding Formula or introduce the National Funding Formula from 2018-19. 76% of schools responded to the consultation and 89% voted in favour of introducing the NFF from 2018-19. This was approved by Cabinet in February 2018 and school budgets for the last five years have been set based on the NFF.
4. The NFF will therefore continue to be used to distributed school budgets for 2024-25.
5. From 2020 the government intended to implement the NFF in full which means that school allocations will be determined by the DfE rather than LAs. However, this has been delayed and there is no fixed date for this.
6. There are no proposed changes to the **structure** of the formula for 2024-25 however there are a number of changes for schools to be aware of.

### Changes in 2024-25

#### Increase in factor values

7. NFF Factor values have increased by:
  - 1.4% to basic entitlement, low prior attainment, FSM6, Income Deprivation Affecting Children Index (IDACI), English as an Additional Language (EAL) mobility and the lump sum.
  - 1.4% to the Minimum Per Pupil Levels (MPPL)

- 0.5% to the funding floor
- 1.6% to the Free School Meals (FSM) factor

8. The 2023-24 Mainstream Schools Additional Grant (MSAG) will be rolled into the NFF. Adjustments have been made to the NFF factor values to reflect this and are included in the figures below, as well as the factor value increases.

**Table 1 – funding formula factor values**

Factors	2023-24		2024-25		% Change	
	Pri	Sec	Pri	Sec	Pri	Sec
Pri AWPU	£3,740		£3,920		4.82%	
KS3 AWPU		£5,272		£5,527		5%
KS4 AWPU		£5,942		£6,230		5%
FSM	£529	£529	£539	£539	2%	2%
Ever6	£777	£1,135	£902	£1,321	16%	16%
IDACIF	£253	£369	£259	£374	2%	1%
IDACIE	£309	£490	£314	£495	2%	1%
IDACID	£485	£683	£490	£693	1%	1%
IDACIC	£529	£749	£534	£759	1%	1%
IDACIB	£562	£804	£567	£814	1%	1%
IDACIA	£738	£1,025	£748	£1,040	1%	1%
LPA	£1,273	£1,928	£1,288	£1,953	1%	1%
EAL	£639	£1,724	£649	£1,744	2%	1%
Mobility	£1,041	£1,499	£1,056	£1,519	1%	1%
Lump Sum	£141,039	£141,039	£147,902	£147,902	5%	5%

9. The Minimum Per-Pupil Funding Levels (MPPL) will be set at £4,610 for primary schools and £5,995 for secondary schools compared with £4,405 and £5,715 in 2023-24.
10. Teachers Pay Grant (TPG) and Teachers Pension Employers Contribution Grant (TPECG) are now fully rolled into the NFF.
11. Block transfers – LAs will continue to be able to transfer up to +0.5% of the schools block to other blocks of the DSG, with schools forum approval. A disapplication is required for transfers above 0.5% or for any amount where schools forum does not give approval.

### **Minimum Funding Guarantee (MFG)**

12. The MFG will continue and the allowable range for 2024-25 is between 0% and +0.5% which is the same as 2023-24
13. This means that each school could gain up to +0.5% *per pupil* compared with the 2023-24 budget. The final value of MFG will be determined by overall affordability within the formula.
14. Where schools are protected by MFG this means that they are receiving funding over and above that which is calculated by the NFF because of the levels of funding they

had been receiving prior to the introduction of the NFF. In future years if the MFG protection is removed then those schools who are funding above the NFF will see an immediate drop in funding from one year to the next.

### **Teacher's Pay Additional Grant (TPAG) 2023-24 and 2024-25**

15. In July 2023 the government announced the TPAG to support schools with the September 2023 teachers' pay award. Funding will be allocated to mainstream schools (5-16 age range), special and Alternative Provision schools. Funding will also be provided for eligible early years provision and 16 to 19 provision in mainstream schools

16. In 2023-24 funding will be for the period September 2023 to March 2024. The TPAG will continue into 2023-25 as a separate grant.

### **Central School Services Block**

17. The CSSB funds the following services:

- School Admissions
- Servicing of Schools Forum
- LA retained duties for schools and academies.

18. The indicative funding for 2024-25 is £1.509m.

### **Growth Fund**

19. Schools Forum agreed to continue to maintain a ring-fenced growth fund from the DSG in order to fund in-year pupil growth in relation to additional classes in maintained and academy schools to create additional classes at the LA's request.

### **High Needs Funding**

20. High Needs funding is designed to support a continuum of provision for pupils and students with special educational needs and disabilities (SEND) from 0-25 years old. The following are funded from the High Needs Block of the DSG:

- Harrow special schools and academies
- Additionally Resourced Mainstream (ARMs) units in mainstream schools
- Places in out of borough special schools and independent school provision
- EHCPs in mainstream schools and academies
- Post 16 provision including Further Education
- SEND Support services and support for inclusion
- Alternative provision including Pupil Referral Units and education other than at school

21. The government introduced a National Funding Formula for High Needs from 2018-19. Funding has previously been based on historical allocations plus small annual amounts of growth. In order to manage increasing growth for demand and complexity, annual funding transfer from the schools block into the high needs block have been approved by Schools Forum

22. From 2018-19 the Schools Block has been ring-fenced and transfers between blocks has been restricted to 0.5% of the Schools Block (approx. £970k). The decision to agree a transfer remains with Schools Forum. It agreed a transfer of 0.5% in 2018-19 and a reduced transfer of 0.25% in 2019-20 however it did not agree to any transfer beyond 2019-20 on the basis that the government should be properly addressing the inherent underfunding of High Needs pupils and to continue to top slice mainstream school budgets masks the extent of the problem.
23. There is anticipated to be an additional £1.3m added to the HNB for 2023-24 however there are already significant pressures on the HNB.
24. At the start of 2023-24 there is a cumulative overspend on the HNB of £2.623m and there is a further projected overspend in 2023-24 of £2.482m, taking the projected cumulative deficit on the HNB to £5.104m by March 2024.

### **DSG deficits**

25. The government consulted on the treatment of deficits in 2019. The outcome of the consultation was a change to the regulations for the treatment of DSG deficits so that LAs must carry forward any HNB deficit to be funded from the next year's budget share. It also explicitly states that LAs cannot and should not fund any DSG deficit from its own reserves.

### **DSG Management Plans**

26. A DSG management plan has been drafted however and discussed with Schools Forum. The SEND Strategy will also be brought to Cabinet for approval in Spring 2024 which will contain updated pupil and financial projections. However, the following points should be noted:
27. Despite the significant proposals and measures planned over the next ten years, this will not mitigate the deficit. This is due to the following contributory factors:
- historical underfunding
  - current budgets being based on historical budgets rather than historical spend
  - extension of age range to include 0-5 and post 19
  - current and projected formulaic funding which does not keep pace with demand
  - significant historical and projected growth in number of EHCPs
  - continued growth in complexity of pupils' needs
  - limitations about creating cost effective provision in borough due to capacity and site limitations

### **Early Years Funding**

28. Funding for Early Years relates to free 15-hour nursery entitlement for all 3- & 4-year-olds in maintained nurseries and nursery classes as well as private, voluntary and independent (PVI) provision. From September 2017 this was extended to 30-hour nursery entitlement for eligible 3- & 4-year-olds. It also funds free 15-hour nursery entitlement for disadvantaged 2-year-olds.

29. A National Funding Formula for Early Years was introduced in 2017-18. Cabinet approved the structure of the Harrow formula for the distribution of funding to providers in January 2018.
30. In 2023-24 there has also been an increase to the published funding rates for 2-, 3- and 4-year-old nursery provision for September 2023 to March 2024. This will be provided through the new Early Years Supplementary Grant (EYSG). This has been used to increase the hourly rates to LAs which in turn must be passed on to providers.
31. From 2024-25 the EYSG funding will be rolled into the Early Years Block of the DSG.
32. Funding rates and allocations will be announced in December 2023.

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