

Planning Policy Advisory Panel Agenda

Date: Monday 6 March 2023

Time: 6.30 pm

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

Membership (Quorum 3)

Chair: Councillor Marilyn Ashton

Conservative Councillors: Christopher Baxter
Stephen Greek (VC)
Zak Wagman

Labour Councillors: Asif Hussain
Nitin Parekh
David Perry

Conservative Reserve Members:

1. Salim Chowdhury
2. Anjana Patel
3. Paul Osborn
4. Norman Stevenson

Labour Reserve Members:

1. Graham Henson
2. Varsha Parmar
3. Krishna Suresh

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Agenda publication date: Friday, 24 February 2023

Agenda - Part I

1. **Attendance by Reserve Members**
To note the attendance at this meeting of any duly appointed Reserve Members.
2. **Declarations of Interest**
To receive declarations of disclosable pecuniary or non pecuniary interests, arising from business to be transacted at this meeting, from all Members present.
3. **Minutes** (Pages 5 - 12)
That the minutes of the meeting held on 9 January 2023 be taken as read and signed as a correct record.
4. **Public Questions**
To note any public questions received.

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

[The deadline for receipt of public questions is 3.00 pm, 1 March 2023. Questions should be sent to publicquestions@harrow.gov.uk No person may submit more than one question].
5. **Petitions**
To receive petitions (if any) submitted by members of the public/Councillors.
6. **Deputations**
To receive deputations (if any).
7. **New Harrow Local Plan - Way Forward and Strategic Objectives** (Pages 13 - 28)
8. **Local Areas of Special Character - Principles and Draft Criteria** (To Follow)
9. **Any Other Urgent Business**
Which cannot otherwise be dealt with.

Agenda - Part II - NIL

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



Planning Policy Advisory Panel

Minutes

9 January 2023

Present:

Chair: Councillor Marilyn Ashton

Councillors: Christopher Baxter Nitin Parekh
Stephen Greek David Perry
Asif Hussain Zak Wagman

**In attendance
(Councillors):** Paul Osborn

19. Attendance by Reserve Members

RESOLVED: To note that there were none.

20. Declarations of Interest

RESOLVED: To note that the following interest was declared:

Agenda Item 9 – Harrow Local Plan – Revised Local Development Scheme
Councillor Stephen Greek declared a non-pecuniary interest in that he was an employee of the London Assembly. He would remain in the room whilst the matter was considered and voted upon.

21. Minutes

RESOLVED: That the minutes of the meeting held on 30 November 2022, be taken as read and signed as a correct record.

22. Public Questions, Petitions and Deputations

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

Recommended Items

23. Draft Tall Buildings (Building Heights) Supplementary Planning Document (SPD)

The Panel received a report of the Corporate Director of Place which provided a progress update to the drafting of a draft Tall Buildings ('Building Heights') Supplementary Planning Document ("SPD") (previously titled 'Tall Buildings SPD'). Members were invited to make comments on the initial draft SPD, which was attached as Appendix 1 to the agenda, prior to the document being considered by Cabinet.

In making their presentation, the officers set out the work undertaken since the presentation to the Panel on 3 October 2022, the next steps post meeting, the timetable and the approach to the drafting of the specific guidance and consultation that had been undertaken to assist in the drafting of the SPD. It was noted that the SPD did not apply within the Harrow and Wealdstone Opportunity Area as Opportunity Areas were designated through the London Plan and were subject to a greater level of change than suburban areas. A number of internal consultations and consultation with external stakeholders had taken place to obtain information to ensure adequate coverage of issues and consistency with relevant requirements with stakeholders. Formal, wider consultation would take place subsequent to consideration and authority to consult by Cabinet.

In opening the discussion, the Chair stated that, whilst the Core strategy encouraged tall buildings in the opportunity area, it did not address suburban areas. The clarity provided by the adoption of the SPD was important as it would be a number of years until the revised local plan was implemented. Policy D9 of the London Plan helped to give it weight.

The view was expressed that the inclusion of a section on long views into the opportunity area from the suburbs was considered useful. Whilst the SPD did not refer directly to the Opportunity Area consideration was given to where it could harm the context of its surrounding areas

The Panel asked a number of questions and the officers responded as follows:

- The proposal was not to adopt the London Plan definition of a tall building but to reflect it as being the trigger for the application of London Plan Policy D9 (as well as the SPD). This was because a SPD was unable to set a definition of what a tall building would be. Would it add weight if the SPD confirmed its adoption? The officer stated that the SPD would be in conformity with the London Plan (and have weight) by not seeking to set an alternative definition of a tall building

because any change in definition would have to be through the Local Plan.

- The summary table of prevailing heights and definitions was very helpful. Would it be communicated to residents? The officer confirmed that there would be liaison with the communications team as part of the formal consultation undertake for the SPD.
- With regard to whether the formula to define contextually tall height within a given area should be greater than twice the prevailing height rather than equal to or greater than, the officer said it would be considered but as it was context based it could be two storeys or more. It was not whether the proposed development was six storeys tall but the prevailing context of the area.
- Have such SPDs in other boroughs discouraged the number of applications for tall buildings? This would be difficult to ascertain. The aim of the SPD was to aid successful applications and it would set out what the Council was aiming to achieve and what it was not looking for from developments.
- How is the feedback from the Harrow Design Review Panel for more guidance/ greater emphasis on family living in terms of appropriate locations for family sized homes, additional guidance on play space dealt with in the SPD? It was difficult to be overly prescriptive as to location of family homes, but would seek an appropriate mix. The SPD did aim to give guidance to the proximity to play space which should meet the space as set out in the London Plan (2021).
- Each application for a tall building would be considered with reference to the SPD and treated on its merits .

The Panel thanked the officers for the work undertaken on the SPD.

Resolved to RECOMMEND: (to Cabinet)

That the draft SPD for Tall Buildings be approved for consultation.

RESOLVED: That the Panel note:

- (1) the change to the title of the draft SPD;
- (2) the contents of the report and the initial draft SPD;
- (3) the proposed timetable headlines; and
- (4) note the outline consultation arrangements should Cabinet agree to consult on the draft document.

24. Neighbourhood Community Infrastructure Levy Review

The Panel received a report and presentation which detailed the outcomes of the review of Neighbourhood Community Infrastructure (NCIL) processes. Members noted that the review covered the reallocation of CIL balances to new Ward Boundaries, future allocations, project identification, project delivery, project approval, NCIL project criteria, unspent sums, and council process management. The Panel was invited to comment on the review and recommendations.

It was noted that NCIL was the allocation of 15% of CIL receipts raised in each Ward back to the respective Ward in which it was generated. For CIL received within the geographical definition of the Harrow and Wealdstone Opportunity Area, NCIL currently involved the allocation of 15% of CIL receipts into a combined fund to be spent on projects across the entire area. During the review the processing of new applications for funding had been on hold as the review could potentially result in changes impacting upon those applications.

The Leader of the Council outlined the reasons for the proposals and responded to questions on the processes.

In response to a question, the officer explained that the annotation for Kenton West in the table in paragraph 5.3 referred to a deficit as the project costed marginally more than was available within the Ward.

During discussion the following views were expressed:

- The proposed cap of £100k on any Ward balance would adversely affect Greenhill, Marlborough, Pinner South and Roxbourne. The proposals should be implemented after the cap was spent.
- Wards within the Opportunity Area benefited from the 85% CIL. Those wards on the edge of the Opportunity Area that were impacted by the development would benefit from the ability to bid into a pooled pot under the new arrangements. The pooled pot would enable projects to proceed rather than balances building up.
- Newly elected Members would not have the opportunity to spend the NCIL in those areas with more than the £100k outstanding.
- Some Wards had built up large balances. The new system would encourage Wards to spend their allocations on projects.
- Not every Borough allocated all CIL to the Ward in which it was raised.
- Residents could be concerned in the budgetary context that individual Wards had in excess of £100k that was not being spent. The new Ward boundaries and the beginning of a four year administration provided the opportunity for revisions to the process.

- All Wards would have the opportunity to bid. Wards affected by the cap could bid into the new NCIL with Ward and community support.
- The new system would result in wards not stockpiling monies but they should be encouraged to use it or lose it before the implementation of the cap. The monies had been frozen since May so a ten month period would enable expenditure prior to implementation of the new system.
- A Member stated that the Leader of the Council could disagree with an application under the delegation for approvals. In response it was stated that the current system included decision making by two Portfolio Holders, having one decision maker would cease split decisions. If the scheme was within the Leader's ward the decision would be taken by the Deputy Leader. His involvement in the decision making as Leader of the Council would only require a declaration of interest if it affected the area in which he lived.
- A scheme of first come first served was not equitable. The introduction of bid rounds (two a year) was suggested to give bids weighting. The Panel agreed that this proposal would be beneficial.

Councillor David Perry moved that the Panel recommend to Cabinet that the proposals be implemented after ten months to enable the cap to be spent. This was seconded by Councillor Parekh. The motion was put to the vote and lost.

Resolved to RECOMMEND: (to Cabinet)

That the proposed recommendation of the Neighbourhood Infrastructure Levy be endorsed with the addition of the introduction of bid rounds during which proposals for funding could be scored against each other.

25. Harrow Local Plan - Revised Local Development Scheme (LDS)

The Panel received a report which provided an update on the review of the Harrow Local Plan, specifically the proposed Local Plan timeline and updated Local Development Scheme (LDS) to reflect this.

In opening the discussion, the Chair referred to the new London Plan published by the Mayor of London in 2021 which carried more weight than the Council's Core Strategy (2012) and Development Management Policies (2013). It was therefore important to update the current Local Plan.

In response to a question regarding consultation with residents, it was stated that the Local Plan was instrumental in shaping the Borough and the Council wanted to fully engage. The formation of the Panel enabled discussions to be held in public and to provide for members of the public to ask questions and make deputations. In addition, consultation was required by the Local Plan Regulations. A Member stated that some new consultation standards would be available shortly and would be applied.

Resolved to RECOMMEND: (to Cabinet)

That the revised Local Development Scheme be approved.

Resolved Items

26. Scoping Report - Residential Conversion Guidance & Residential Extension Guidance Chapters - Draft Small Site Design Code Supplementary Planning Document (SPD)

The Panel received a report and presentation on the proposed approach to be taken to prepare specific design guidance for residential conversions which was proposed to be progressed as a chapter within the draft Small Sites Design Code Supplementary Planning Document. In addition, the report provided further detail required on the householder extension guidance as initially drafted within the draft Small Sites Design Code SPD.

Members noted that, once drafted, the guidance would be submitted to a subsequent meeting of the Panel prior to consideration by Cabinet thereafter seeking adoption as part of the Small Sites Design Code SPD.

In the discussion that ensued, Members raised the following points:

- The approach would provide more guidance and emphasis on achieving higher standards as there was currently insufficient information in local policies. The inappropriateness of previous applications with regard to the prominence of refuse bins, access to amenity space and the need to take care with regard to stacking would be highlighted.
- A Member suggested the inclusion of a requirement for heat source pumps and charging points. It was noted that it would be difficult to introduce new policy and such items would need to be brought in by policies in the new Local Plan.
- The Member further suggested that all applications for conversions be submitted to the Planning Committee. The Chair informed the Panel that she did call some conversions in but each application was treated on its own merits. Some applications met the requirements. It was not agreed to call all residential conversion applications in to be considered by committee.
- In response to a question regarding timetabling, it was stated that, as the work would be subsumed into the existing workload, a timeline could not be given.
- With regard to a question as to the possibility of encouraging the installation of solar panels for existing ground floor flats, it was stated that this would be a civil matter between the landholder and lessee and not a planning matter.

- It was further noted that oversight/ management of frontages was a civil matter, often a management issue agreed amongst tenants of flats. In the case of very untidy frontages, a Section 215 notice could be served.

RESOLVED: That the Panel note:

- (1) the report and the recommended approach to bringing forward residential conversion design guidance, by way of a specific chapter within the draft Small Sites Design Code Supplementary Planning Document;
- (2) the further detail to be provided in relation to householder extension guidance;
- (3) the proposed draft residential conversion design principles contained in Appendix 1;
- (4) the proposed timetable headlines contained within paragraph 4.5.

(Note: The meeting, having commenced at 6.00 pm, closed at 8.35 pm).

(Signed) Councillor Marilyn Ashton
Chair

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**Report for: Planning Policy
Advisory Panel**

Date of Meeting:	6 March 2023
Subject:	New Harrow Local Plan –way forward and strategic objectives
Key Decision:	No – for information and discussion only
Responsible Officer:	David Hughes – Planning Policy Manager Viv Evans – Chief Planning Officer
Portfolio Holder:	Cllr Marilyn Ashton – Deputy Leader of the Council and Portfolio Holder for Planning and Regeneration
Exempt:	No
Decision subject to Call-in:	No – for information and discussion only
Wards affected:	All Wards
Enclosures:	None

Section 1 – Summary and Recommendations

This report seeks to introduce the Local Plan process and key issues that will need to be addressed as part of the new Harrow Local Plan and invite comment and discussion from the Panel to assist in the scoping of the Local Plan, including its broad vision and objectives.

The report will be accompanied by a presentation.

Recommendations:

The Planning Policy Advisory Panel is requested to note and comment on the report and accompanying presentation.

Reason:

Stakeholder input into the development of the New Local Plan is essential in ensuring that the Plan reflects the aspirations and priorities of the Council and the community; the Panel is a key stakeholder in the Local Plan process. The broad vision and strategic objectives set the framework for the development of the plan and therefore the Panel’s input into this process (facilitated by this report and discussion) is sought.

Section 2 – Report

1.0 Introduction

- 1.1 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.
- 1.2 At its last meeting on 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.
- 1.3 In the context of the above, this report and accompanying presentation seek to introduce the Local Plan process in more detail and key issues that it will need to be addressed. It invites comment and discussion from the Panel to assist in the scoping of the Local Plan, including its broad vision and objectives. The discussion will also inform drafting of the new Local Plan, which will be presented to the Panel over a number of meetings in 2023 in the lead-up to agreement by Cabinet to undertake the initial consultation (‘Regulation 18 consultation’) on the draft Local Plan at the end of 2023.

2.0 Options considered

- 2.1 The National Planning Policy Framework emphasizes the role of Local Plans in the planning system: ‘The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings’ (paragraph 13).
- 2.2 Input from elected members is central in shaping the vision of the borough through the Local Plan process and early input (such as this report, presentation and discussion) seeks to ensure any draft plan reflects this vision. The alternative option of not doing this is not considered appropriate as it may result in a draft plan that doesn’t respond to members’ vision and input and necessitate further work and delays to the process. That option has therefore been discounted.

3.0 Background – the Tiers of Planning

National Planning Policy Framework

- 3.1 The National Planning Policy Framework (NPPF) sets out government's planning policies for England and how these are expected to be applied. It covers both:
- (a) 'plan making' – what regional and local plans are expected to address / achieve, the evidence required to support policies and the process for their preparation
 - (b) 'decision taking', including the weight accorded to policies in the development plan (and whether they are considered 'out-of-date') and default 'national' policies, including key ones relating to Green Belt, historic environment and flooding.
- 3.2 The NPPF should be used to decide applications where the local plan is absent, silent, indeterminate or where relevant policies are out of date.

Statutory Development Plan – London Plan and the Harrow Local Plan

- 3.3 The statutory development plan for Harrow comprises the **London Plan 2021** and the **Harrow Local Plan**. Planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise.

London Plan 2021

- 3.4 The London Plan (2021) was published on 2 March 2021, becoming London's Spatial Development Strategy and part of Harrow's Development Plan, replacing the version adopted in 2016. Where applicable, policies within the London Plan must be considered in determining planning applications (as it is part of the borough's development plan).
- 3.5 The London Plan is also relevant to the preparation of the new Harrow Local Plan as the Local Plan has to be in 'general conformity' with the London Plan. General conformity provides some scope for local variation in local plans (i.e. its not 'absolute' conformity) but the London Plan drafting will determine any scope (i.e. whether a requirement is something boroughs 'must', 'should' or 'may' do).

Harrow Local Plan

- 3.6 The Harrow Local Plan currently comprises:
- (a) **Core Strategy (February 2012)** - sets out the long-term vision of how Harrow, and the places within it, should develop by 2026 and sets out the Council's spatial strategy for delivering that vision. In particular, it identifies the broad locations for delivering

housing and other strategic development needs such as employment, retail, leisure, community facilities and other uses. It also sets the context for the other policy documents that make up the Harrow Local Plan.

- (b) **Harrow and Wealdstone Area Action Plan (July 2013)** - prepared jointly with the GLA and other partners, it sets out a comprehensive set of policies, proposals and site allocations for development within the Harrow and Wealdstone Intensification Area¹, which includes the town centres of Harrow and Wealdstone, the corridor between them, and the business land surrounding Wealdstone. It includes major redevelopment opportunities and supporting social and physical infrastructure, and sets out the planning framework promoting significant change, and where applicable detailed development management policies.
- (c) **Development Management Policies Local Plan (July 2013)** - contains detailed policies that planning applications for development or land use will be assessed against. The policies are generally criteria based and focus on giving effect to the strategic objectives and policies of the Core Strategy.
- (d) **Site Allocations Local Plan (July 2013)** - sets out the allocated sites except for those set out in the Area Action Plan. It identifies the locations and sites for specific types of development in order to ensure the vision, objectives and strategy of the Core Strategy are implemented. The broad parameters for development of each site are listed covering land use and development criteria.

3.7 The above are 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').

3.8 As the Harrow Local Plan documents above were prepared over five years ago, aspects of them are considered to be out-of-date and where the London Plan has a policy also covered in the Harrow Local Plan, the London Plan policy will take precedence where there is a conflict as the London Plan was adopted more recently.

3.9 The West London Waste Plan (July 2015) is also part of the Harrow Local Plan. This is a joint Local Plan document prepared by the six west London Boroughs of Harrow, Brent, Ealing, Hillingdon, Hounslow and Richmond. The joint West London Waste Plan (WLWP) identifies and safeguards sufficient sites for waste management facilities in the area to deal with West London's own waste up to 2031. The Plan also contains policies against which to assess proposals for waste management facilities. This plan will be updated separately.

¹ Now an Opportunity Area

Supplementary Planning Documents and other material considerations

- 3.10 Supplementary Planning Documents support policies in the Core Strategy. They are recognised in legislation. They have been subject to public consultation and approved by Executive. Supplementary Planning Documents are a material consideration in the determination of planning applications.
- 3.11 Other material considerations include emerging draft plans prepared under a statutory scheme. They gain weight as they reach an advanced stage of preparation but have not been examined or adopted.

4.0 Context for the New Local Plan

Achieving sustainable development

- 4.1 The NPPF indicates that the purpose of the planning system is to contribute to the achievement of sustainable development. The objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 4.2 The planning system therefore has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways:
- (a) An economic objective
 - (b) A social objective
 - (c) An environmental objective

The presumption in favour of sustainable development

- 4.3 The NPPF further indicates that all plans should promote a sustainable pattern of development that seeks to:
- (a) meet the development needs of their area;
 - (b) align growth and infrastructure;
 - (c) improve the environment;
 - (d) mitigate climate change;
 - (e) including by making effective use of land in urban areas
- 4.4 Any strategic policies within a Local Plan should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
- (a) the application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for

- restricting the overall scale, type or distribution of development in the plan area; or
- (b) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

What Plans should do

- 4.5 In the above context, the NPPF indicates the New Local Plan should:
- (a) be prepared with the objective of contributing to the achievement of sustainable development;
 - (b) be prepared positively, in a way that is aspirational but deliverable;
 - (c) be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
 - (d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
 - (e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
 - (f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)
- 4.6 It is relevant to note that the Government is proposing amendments to the NPPF that will impact upon the approach to preparing local plans. Consultation closes 3 March 2023 and the outcomes of this process should be known mid-year. The implications of any final changes to the NPPF on the preparation of the New Harrow Local Plan will need to be considered and if necessary, the process, timeframes and approach revised in response. The Panel would be advised if such action was required, and potential responses put forward.

5.0 Vision and Objectives – current Local Plan

- 5.1 As noted above, the Harrow Core Strategy sets out the long-term vision of how Harrow, and the places within it, should develop by 2026 and sets out the Council's spatial strategy for delivering that vision. Key elements of the vision are that by 2026, there would be:
- (a) A more sustainable community
 - (b) Comprehensive and co-ordinated regeneration activity
 - (c) The Northolt Road business use area will have been renewed
 - (d) Rayners Lane will be enhanced to one of the best examples of a classic Metroland and Art Deco Centre in outer London
 - (e) The leafy suburban character of the Borough's residential areas will have been safeguarded as areas of low density, family housing.

- (f) The future of Bentley Priory and the RNOH will have been secured as places of national importance
- (g) Employment land throughout the Borough will have managed to preserve a supply most suitable or existing and future needs
- (h) The housing needs of the borough will have been met
- (i) The overall amount of waste generated in the Borough will have been reduced

5.2 The full spatial vision is included in Appendix 1.

5.3 The current Core Strategy also includes four objectives with associated measures to achieve those objectives. The four objectives are:

- (a) Protect the historical and environmental features that contribute to Harrow's character and distinctiveness as a place to live, work and visit
- (b) Enhance the infrastructure, environment and other resources which make Harrow a desirable place to live, work and visit
- (c) Manage the Borough's contribution to climate change and increase resilience to flooding
- (d) Adapt to population and demographic changes to meet people's needs and quality of life

5.4 The measures associated with the four objectives are included in Appendix 1.

6.0 What's changed?

Changes to National policy and requirements

6.1 The original National Planning Policy Framework (NPPF) was published in March 2012. The current Harrow Local Plan was considered to be in conformity with the NPPF 2012².

6.2 The Government published a completely revised NPPF in July 2018 and made further amendments to it in February 2019 and July 2021 (the current version).

6.3 As noted above, further changes are proposed to the NPPF and the new Local Plan will need to be cognisant of the potential implications of this. Many of the proposed changes are intended to make the plan making process less difficult by reducing obligations on local planning authorities.

6.4 There have also been countless changes to statutory instruments and planning regulations. These include the extension of permitted development rights (i.e. development that doesn't require full planning permission) (a common example in Harrow being the change of use from office-to-residential) and a new Use Class Order that re-

² See [Local Plans \(harrow.gov.uk\)](https://www.harrow.gov.uk/local-plans)

classified some of the uses, and / or include existing uses into other use classes, impacting upon the current Plan's ability to manage changes of use. The most notable change was the introduction of the E Use Class, which now incorporates many of the previous classes within A Use Class (i.e. shops, financial and professional services, and restaurants and cafes), B1 (offices, research and development of products / processes, industrial processes) and parts of D1 (medical / health, creche, day nursery) and D2 (indoor sport, recreation or fitness) use classes.

- 6.5 Environment and climate change provisions and technology have changed significantly, with the introduction of legislation such as the Environment Act that includes new requirements relating to biodiversity net gain, nature recovery, air quality and waste reduction and resource efficiency.
- 6.6 Additionally, new requirements in relation to fire safety have been introduced in response to the Grenfell tragedy.
- 6.7 Further changes are proposed through the Levelling up and Regeneration Bill and the Planning and Infrastructure Bill. The Local Development Scheme (LDS) report considered by the Panel at its meeting on 9 January 2023 provided a summary of these bills and the potential risks to the local plan timetable³.

London Plan 2021

- 6.8 As noted above, the London Plan (2021) was published in March 2021 and replaced the previous version which was amended in 2016 (the current Local Plan was prepared under the 2011 version of the London Plan). Any review of the Harrow Local Plan must be in 'general conformity' with the London Plan (2021).
- 6.9 The following are considered key policies in the London Plan (2021) which will need to be reflected or addressed in the Harrow Local Plan:
 - i. Identifying sufficient additional housing capacity to reflect the increase in Harrow's 10-year housing target from 5,930 homes to 8,020 homes, including the small sites target of 3,750 homes (small sites are those less than 0.25 hectares).
 - ii. Identifying areas within the borough considered suitable for suburban intensification (namely through development on small sites).
 - iii. A design led approach to determining site density, rather than applying a density matrix.
 - iv. Defining what constitutes a tall building/s within the borough and identifying areas within the borough that maybe suitable for such buildings.

³ See

<https://moderngov.harrow.gov.uk/documents/s179826/Local%20Development%20Scheme%20-%20Background%20Paper%20Legislative%20Risk.pdf>

- v. The Mayor's threshold approach to affordable housing financial viability assessments and local flexibility with respect to affordable housing tenures.
- vi. Identifying potential areas for industrial intensification and mixed-use development. Greater protection for industrial land including non-designated industrial land.
- vii. Responding to climate changes, including zero carbon development.
- viii. Determining infrastructure requirements arising from the projected population increase in the borough and the geographic spread of new housing and identifying potential locations to accommodate this new infrastructure.

6.10 The new London Plan will be considered in more detail when specific aspects of the draft Local Plan / review are considered. The above is intended to provide key headline considerations by way of background.

Harrow Evidence Base

6.11 The NPPF⁴ requires that Local Plans are based on adequate up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Much of Harrow's evidence base was prepared prior to the adoption on the current Local Plan documents and therefore many aspects of it are arguably out-of-date.

6.12 The recent focus of work on the Local Plan review has therefore been on updating the Council's evidence base work, with the following work completed or in the process of being undertaken:

Completed

- (a) Harrow Economic Development Needs Assessment (EDNA) (July 2017)
- (b) West London Strategic Flood Risk Assessment (April 2018, updated as required as dynamic online document)
- (c) Harrow Strategic Housing Market Assessment (SHMA) and West London Strategic Housing Market Assessment (August 2018)
- (d) West London Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (August 2018)
- (e) West London Small Sites Strategic Housing Land Availability Assessment (December 2018)
- (f) West London Employment Land Evidence (July 2019)
- (g) West London Affordable Workspace Study (early 2021)
- (h) Harrow Small Sites Capacity Study (2022)
- (i) Characterisation Study for Harrow (including identification of areas suitable for tall and taller buildings) (August 2021)
- (j) West London Strategic Infrastructure Delivery Plan (March 2022)

⁴ NPPF, paragraph 31

Current

- (k) West London 'E Use Class' Study (anticipated mid-2023)
- (l) Harrow Strategic Housing Market Assessment (SHMA) update (anticipated March 2023)
- (m) Sporting pitches (anticipated mid-2023)
- (n) Net Zero Carbon study (March 2023)

7.0 Way forward

7.1 As noted above, the new Local Plan will need to set out the spatial vision and objectives for the borough in order to meet the needs of the borough in a sustainable manner. To do this, consideration needs to be given to:

- (a) What is the Council's vision for the borough?
- (b) What are the objectives for the new Local Plan?
- (c) What are the needs the Local Plan should be seeking to meet?
- (d) What are the issues the Local Plan should address?

7.2 The presentation and discussion at the meeting will cover the above.

Ward Councillors' comments

Not applicable – covers all wards

Risk Management Implications

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

Separate risk register in place? **Yes** – as part of a weekly report reviewed by the Chief Planning Officer

This report is for information and discussion only so no immediate risks arising from the report.

Procurement Implications

None – report for information and discussion only.

Legal Implications

None – report for information and discussion only.

Financial Implications

None – report for information and discussion only.

Equalities implications / Public Sector Equality Duty

None – report for information and discussion only.

Council Priorities

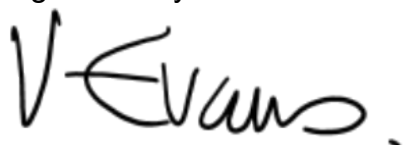
Please identify how the decision sought delivers this priority.

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 to Restore Pride in Harrow.

Section 3 - Statutory Officer Clearance

Chief Officer: Viv Evans
Signed off by the Chief Officer



Date: 24 February 2023

Mandatory Checks

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

EqIA carried out: NO

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

Panel is not a decision-making body and report is for information only. The Plan itself will be subject to a full EqIA

EqIA cleared by: N/A

Section 4 - Contact Details and Background Papers

Contact: David Hughes, Planning Policy Manager,
david.hughes@harrow.gov.uk.

Background Papers:

National Planning Policy Framework: [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/publishing/service/gov/uk)

London Plan (2021): [The London Plan | London City Hall](#)

Harrow Local Plan: [Planning and Developments – Harrow Council](#)

Call-in waived by the Chair of Overview and Scrutiny Committee

(for completion by Democratic Services staff only)

YES/ NO / NOT APPLICABLE*

** Delete as appropriate*

If Yes, set out why the decision is urgent with reference to 4b - Rule 47 of the Constitution.

Appendix 1 – Current Core Strategy (2012) – Spatial Vision and Strategic Objectives

HARROW'S SPATIAL VISION

By 2026 Harrow will be a more sustainable community, its residents will benefit from an improving quality of life, having good access to a range of local facilities (including shops, public transport, recreation and leisure pursuits) services (including healthcare, education and training) housing and employment. New development and economic growth will have provided 6,050 net new homes, created over 4,000 additional new jobs and funded significant local improvements that benefit all in the community. The innovative and high quality design of new development will have also contributed to local distinctiveness, creating attractive buildings and spaces that foster community pride, raise the image of the Borough, whilst also delivering on the climate change agenda.

Comprehensive and coordinated regeneration activity will have positively transformed the Harrow & Wealdstone Intensification Area, delivering at least 2,800 net new homes and 3,000 additional new jobs, and creating diverse and varied neighbourhoods where people choose to live and work. Harrow town centre will be a vibrant and attractive Metropolitan Centre having benefited from additional retail, leisure and hotel development, and having renewed much of its older office stock. It will have developed its role as the prime location for central public services including the relocation of the Council's Civic Centre towards the end of Plan period. Wealdstone will have developed its own, distinctive identity as a successful district shopping centre 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.

Station Road will have benefited from redevelopment and environmental improvement as the principal component that binds the two centres together. Harrow-on-the-Hill Station, Harrow Bus Station and Harrow & Wealdstone Station will be accessible major public transport nodes. New development will have contributed to a coherent new character achieving high standards of sustainability, public realm and residential quality.

Improved pedestrian inter-connectivity between Harrow town centre and Harrow-on-the-Hill will have benefited residents and businesses in both locations whilst preserving their separate identities. The Borough's Metropolitan Open Land, Green Belt and other open space will have been maintained and enhanced as an interconnected network of green infrastructure and open watercourses supporting biodiversity and healthy lifestyles. The quality and accessibility of open space will have been maintained, and better provision for children's and teenagers' playspace will have been made. Views of St. Mary's Church and Harrow Weald Ridge will be a distinctive local feature cherished by residents and visitors alike. Harrow's identified heritage assets and historic environment, in particular, the special character of Harrow Hill, Harrow Weald Ridge and Pinner Hill, will continue to be valued, having been conserved and enhanced.

The Northolt Road business use area will have been renewed, providing a secondary location for economic activity, as part of mixed use development, beyond the Intensification Area. The regeneration of the Rayners Lane and Mill Farm estates will have delivered high quality new homes, environmental and social benefits to the estates' residents. North Harrow District Centre will be restored as a vibrant local shopping and service centre meeting the needs of residents and supporting local business.

Rayners Lane will be enhanced to one of the best examples of a classic Metroland and Art Deco centre in outer London. The quality of Pinner High Street will have been preserved and enhanced. At Stanmore, mixed use retail and residential development will have strengthened its function as District Centre, and the Wood Farm extension to Stanmore Country Park will have delivered a significant increase in natural greenspace accessible to residents and visitors alike. 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.

The leafy, suburban character of the Borough's residential areas will have been safeguarded as areas of low density, family housing. Gardens will have been protected from inappropriate development, both as an amenity and as an environmental resource. Development opportunities, on previously-developed sites across the Borough, will have been successfully managed to integrate with their surroundings and will have contributed to environmental improvement and infrastructure in the locality.

The future of Bentley Priory and the Royal National Orthopaedic Hospital will have been secured as places of national importance.

Employment land throughout the Borough will have been managed to preserve a supply most suited to existing and foreseeable needs. Harrow will have maintained its market share of retail expenditure to secure the vitality and viability of the Borough's town centre network to meet local needs for shopping and services.

The housing needs of the Borough's residents will have been met through provision of a range of housing types and tenures including provision of family sized affordable housing and supported housing for the elderly and vulnerable people.

The overall amount of waste generated in the Borough will have been reduced, with high levels of recycling and composting achieved and sustained.

Harrow's Core Strategy objectives

- 3.18 The following Borough-wide strategic objectives provide the link between Harrow's spatial vision and the strategy for delivery set out throughout the rest of this document. They build on the objectives of the Harrow Sustainable Community Strategy and draw on findings of the evidence base and the views of residents and businesses about what needs to happen to manage the impact of development and growth of the Borough as a whole.
1. Protect the historical and environmental features that contribute to Harrow's character and distinctiveness as a place to live, work and visit by:
 - Protecting the Green Belt, Metropolitan Land and Areas of Special Character;
 - Safeguarding important local views and the setting of Harrow Hill;
 - Conserving or enhancing the significance of heritage assets for their intrinsic and economic values;
 - Preserving the Metroland and suburban character of Harrow, including gardens and tree management; and
 - Preserving the quality and function of the natural environment.

2. Enhance the infrastructure, environment and other resources which make Harrow a desirable place to live, work and visit by:
 - Ensuring that growth is matched by enhancements to social and physical infrastructure, including education, health care, recreation and cultural facilities;
 - Improving sustainable transport capacity, accessibility and quality to meet users' needs and expectations;
 - Safeguarding and enhancing the vitality and viability of Harrow Metropolitan Centre, district and local centres;
 - Promoting major retail, leisure, hotel development and office renewal in Harrow town centre;
 - Planning, monitoring and managing employment land to meet the needs of Harrow's businesses and growth objectives;
 - Delivering a mix of homes including market, affordable and low cost housing to meet residents' needs;
 - Maintaining open space to provide a multi-functional and interconnected resource;
 - Enhancing community access to and better use of open space, sport and recreation facilities; and
 - Ensuring residents have access to education and training to access new jobs.

 3. Manage the Borough's contribution to climate change and increase resilience to flooding by:
 - Co-ordinating development and public transport to promote more sustainable patterns of land use to reduce reliance on private vehicles;
 - Achieving sustainable design and construction in all new development;
 - Promoting retrofitting and other initiatives that improve the energy efficiency of the existing housing stock;

 4. Adapt to population and demographic changes to meet people's needs and quality of life by:
 - Reducing waste generation and increase recycling rates;
 - Directing development away from areas of high flood risk and increase natural and sustainable drainage; and
 - Improving air quality.
- 3.19 The above objectives are not provided in any order of importance or priority. They are however, further elaborated upon at the beginning of each core policy, setting the context for how each is to be met within the different parts of the Borough.

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