



# Cabinet Agenda

**Date:** Thursday 27 July 2023  
**Time:** 6.30 pm  
**Venue:** The Auditorium - Harrow Council Hub,  
Kenmore Avenue, Harrow, HA3 8LU

## Membership:

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**Chair:** Councillor Paul Osborn (Leader of the Council and Portfolio Holder for Strategy)

<b>Portfolio Holders:</b>	<b>Portfolio:</b>
Councillor Marilyn Ashton	Deputy Leader of the Council and Portfolio Holder for Planning & Regeneration
Councillor David Ashton	Finance & Human Resources
Councillor Stephen Greek	Performance, Communications & Customer Experience
Councillor Hitesh Karia	Children's Services
Councillor Jean Lammiman	Community & Culture
Councillor Mina Parmar	Housing
Councillor Anjana Patel	Environment & Community Safety
Councillor Pritesh Patel	Adult Services & Public Health
Councillor Norman Stevenson	Business, Employment & Property

<b>Non-Executive Members:</b>	<b>Role:</b>
Councillor Thaya Idaikkadar	Non-Executive Cabinet Member
Councillor Kanti Rabadia	Non-Executive Cabinet Member
John Higgins	Non-Executive Voluntary Sector Representative Harrow Youth Parliament Representative

## Quorum 3, including the Leader and/or Deputy Leader

**Contact:** Nikoleta Kemp, Senior Democratic & Electoral Services Officer  
Tel: 07761 405898 E-mail: [nikoleta.kemp@harrow.gov.uk](mailto:nikoleta.kemp@harrow.gov.uk)

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# Useful Information

## Joining the Meeting virtually

The meeting is open to the public and can be viewed online at [London Borough of Harrow webcasts](#)

## Attending the Meeting in person

### Directions by car:

Go along Kenmore Avenue and head towards the Kenton Recreation Ground. When approaching the end of the Kenmore Avenue turn right before reaching the Kadwa Patidar Centre.

The venue is accessible to people with special needs. If you have specific requirements, please contact the officer listed on the front page of this agenda.

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

Please:

- (1) Stay seated.
- (2) Access the meeting agenda online at [Browse meetings - Cabinet](#)
- (3) Put mobile devices on silent.
- (4) Follow instructions of the Security Officers.
- (5) Advise Security on your arrival if you are a registered speaker.

## Filming / recording

This meeting may be recorded or filmed, and if you choose to attend, you will be deemed to have consented to this. Any recording may be published on the Council website.

**Agenda publication date: Wednesday 19 July 2023**

## **Agenda - Part I**

### **1. Apologies for Absence**

To receive apologies for absence (if any).

### **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. Petitions**

To receive any petitions submitted by members of the public or Councillors.

### **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, 24 July 2024. Questions should be sent to [publicquestions@harrow.gov.uk](mailto:publicquestions@harrow.gov.uk)**

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

### **5. Councillor Questions**

To receive any Councillor questions.

Questions will be asked in the order agreed with the relevant Group Leader by the deadline for submission and there be a time limit of 15 minutes.

**[The deadline for receipt of Councillor questions is 3.00 pm, 24 July 2023].**

### **6. Key Decision Schedule August - September 2023 (Pages 7 - 10)**

### **7. Progress on Scrutiny Projects (Pages 11 - 12)**

For consideration

## **Place**

### **KEY 8. Procurement of Arboriculture Services (Pages 13 - 18)**

Report of the Corporate Director of Place and the Director of Environment.

### **KEY 9. Procurement of Estate Improvements and Roof Renewals (Pages 19 - 50)**

Report of the Corporate Director of Place and the Director of Housing.

- KEY 10. Electric Vehicle Charging in Harrow: Update and Implementation**  
(Pages 51 - 64)

Report of the Corporate Director of Place.

- KEY 11. UKSPF Supply Ready (West London) and Skills and Employment**  
(Pages 65 - 100)

Report of the Corporate Director of Place and the Director of Inclusive Economy, Leisure and Culture.

- KEY 12. Tall Buildings ('Building Heights') Supplementary Planning Document (SPD)** (Pages 101 - 270)

Report of the Corporate Director of Place and the Chief Planning Officer.

- KEY 13. Adoption of the Updated Statement of Community Involvement (SCI)**  
(Pages 271 - 330)

Report of the Chief Planning Officer.

- KEY 14. Review and adoption of the Corporate Property Strategy** (Pages 331 - 372)

Report of the Corporate Director of Place.

- KEY 15. Disposal of two freehold Council interests: 105 Eastcote Lane, HA2 8RN and 2 Hermitage Cottages, HA7 3JW** (Pages 373 - 380)

Report of the Corporate Director of Place.

## **Resources and Commercial**

- KEY 16. Electoral Print Contract** (Pages 381 - 390)

Report of the Interim Director of Legal and Governance Services.

- KEY 17. Revenue and Capital Budget Outturn 2022/23** (Pages 391 - 438)

Report of the Director of Finance and Assurance.

- 18. Treasury Management Annual Outturn Report for 2022/23** (Pages 439 - 458)

Report of the Director of Finance and Assurance.

- 19. Any Other Urgent Business**

Which cannot otherwise be dealt with.



## 20. Exclusion of the Press and Public

To resolve that the press and public be excluded from the meeting for the following item of business for the reasons stated.

Agenda Item No	Title	Description of Exempt Information
21	Procurement of Arboriculture Services – Appendices 1 - 4	Information under paragraph 3 of Part I of Schedule 12A to the Local Government Act 1972, relating to the financial or business affairs of any particular person (including the authority holding that information).
22	Procurement of Estate Improvements and Roof Renewals – Appendices 1 - 19	
23	Electric Vehicle Charging in Harrow: Update and Implementation of On-Street Charge Point Scheme Residential Tranches 2 and 3 – Appendices 1 - 4	
24	Authority to Dispose of Assets – Appendix A	
25	Electoral Print Contract – Appendices 1 – 6B	
26	Revenue and Capital Budget Outturn 2022/23 – Appendix 5	

## Agenda - Part II

### 21. Procurement of Arboriculture Services (Pages 459 - 606)

Appendices 1 – 4 to the report of the Corporate Director of Place and the Director of Environment.

### 22. Procurement of Estate Improvements and Roof Renewals (Pages 607 - 1278)

Appendices 1 – 19 to the report of the Corporate Director of Place and the Director of Housing.

### 23. Electric Vehicle Charging in Harrow: Update and Implementation (Pages 1279 - 1494)

Appendices 1-4 to the report of the Corporate Director of Place.

### 24. Authority to Dispose of Assets (Pages 1495 - 1496)

Appendix A to the report of the Corporate Director of Place.

**25. Electoral Print Contract** (Pages 1497 - 1690)

Appendices 1 – 6B to the report of the Interim Director of Legal and Governance Services.

**26. Revenue and Capital Budget Outturn 2022/23** (Pages 1691 - 1692)

Appendix 5 to the report of the Director of Finance and Assurance.

**Data Protection Act Notice**

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

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

Deadline for questions	3.00 pm on 24 July 2023
Publication of decisions	28 July 2023
Deadline for Call in	5.00 pm on 04 August 2023
Decisions implemented if not Called in	05 August 2023

## London Borough of Harrow

### Key Decision Schedule (August - September 2023 )

#### August 2023

This is a list of Key Decisions which the Authority proposes to take at the above Cabinet meeting. The Cabinet agenda containing all the reports being considered will be published 5 clear days before the meeting.

↘ **A Key Decision is one which is likely to:**

- (i) result in the Council incurring expenditure which is, or the making of savings which are, significant having regard to its budget for the service or function to which the decision relates. A decision is significant if it involves expenditure or the making of savings of an amount in excess of £1m of capital or £500,000 of revenue or where savings or expenditure are less than these amounts but they constitute more than 50% of the budget attributable to the service in question; or
- (ii) be significant in terms of its effects on communities living or working in an area of two or more wards of the Borough.

#### Decisions which the Cabinet intends to make in private

The Cabinet may meet in private to consider reports which contain confidential information. A private meeting of the Cabinet is open only to Members of the Cabinet, other Councillors and Council officers. This Schedule also contains non-Key Decisions which involve Cabinet meeting in private. Any person can make representations to the Cabinet if they believe the decision should instead be made in the public Cabinet meeting by emailing [democratic.services@harrow.gov.uk](mailto:democratic.services@harrow.gov.uk).

The membership of the Cabinet is:

[Councillor Paul Osborn](#) (Leader; Strategy)

[Councillor Marilyn Ashton](#) (Deputy Leader, Planning & Regeneration)

[Councillor David Ashton](#) (Finance & Human Resources)

[Councillor Stephen Greek](#) (Performance, Communications & Customer Experience)

[Councillor Hitesh Karia](#) (Children's Services)

[Councillor Jean Lammiman](#) (Community & Culture)

[Councillor Mina Parmar](#) (Housing)

[Councillor Anjana Patel](#) (Environment & Community Safety)

[Councillor Pritesh Patel](#) (Adult Services & Public Health)

[Councillor Norman Stevenson](#) (Business, Employment & Property)

Subject	Nature of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
<b>AUGUST 2023 - NO MEETINGS</b>				
<b>SEPTEMBER 2023</b>				
Procurement of Education IT System	To request an award of contract to with Capita Business Services for One Education modules plus Family Hub and Youth Justice software	<p>Councillor Hitesh Karia; Councillor Stephen Greek; Councillor David Ashton</p> <p>Divisional Director, Education Services david.harrington@harrow.gov.uk, tel. 07714 089170</p>	Part exempt	

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**PROGRESS ON SCRUTINY PROJECTS**

<b>Review</b>	<b>Methodology</b>	<b>Type of report</b>	<b>Expected date for report to Cabinet</b>	<b>Comments</b>
<b>North West London Joint Overview &amp; Scrutiny Committee (JHOSC)</b>	Joint Committee	Update reports provided to Health & Social Care sub committee (for information)	As required	<p>The North West London (NWL) JHOSC last met on 6 June 2023 to discuss the work programme for the year. Harrow put forward questions around NWL discharges funding for boroughs and NWL ICB (Integrated Care Board) plans to address pressures from change in Police response to mental health incidents. The latter has been included within a September item on NWL Mental Health Strategy and the former is awaiting a response from NWL ICB.</p> <p>There are regular update reports on the JHOSC to Harrow’s Health and Social Care Scrutiny Sub-Committee so that there is a formal feedback loop between regional and local health scrutiny. Councillor Chetna Halai, Chair of the Health and Social Care Scrutiny Sub-Committee, is Harrow’s member on the JHOSC.</p>
<b>Customer Experience</b>	Review	Report to September O&S and Cabinet thereafter	TBC	<p>Review is on schedule for September Overview and Scrutiny Committee. Scheduled Dates for Consultations are as follows:</p> <ul style="list-style-type: none"> <li>- VCS (Voluntary &amp; Community Sector) Consultation – Tuesday 18<sup>th</sup> July</li> <li>- Member Consultation – Thursday 20<sup>th</sup> July (may be rescheduled due to low attendance sign up)</li> <li>- Greenhill Library/Gayton Road are ongoing</li> </ul> <p>A challenge panel is planned for after consultations have concluded.</p>

**Contact:** Nahreen Matlib, Senior Policy Officer

**Email:** [nahreen.matlib@harrow.gov.uk](mailto:nahreen.matlib@harrow.gov.uk)

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**Report for: Cabinet**

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<b>Date of Meeting:</b>	27 July 2023
<b>Subject:</b>	Procurement of Arboriculture Services
<b>Key Decision:</b>	Yes, as it is significant in terms of its effects on communities living or working in an area of two or more wards of the Borough.
<b>Responsible Officer:</b>	Dipti Patel - Corporate Director of Place Cathy Knubley- Director of Environment
<b>Portfolio Holder:</b>	Councillor Anjana Patel - Portfolio Holder Environment and Community Safety Councillor David Ashton - Portfolio Holder for Finance and Human Resources
<b>Exempt:</b>	No, except for appendices 1 - 4 which are exempt by virtue of Paragraph 3 of Schedule 12A of the Local Government Act 1972 because they contain information relating to the financial & business affairs of the Council
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All
<b>Enclosures:</b>	Appendix 1 Draft Call off Contract (Exempt) Appendix 2 Draft Arboriculture Services Specification (Exempt) Appendix 3 Draft Invitation to Tender (Exempt) Appendix 4 Draft Pricing Schedule (Exempt)

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

This report requests authority from Cabinet to commence a procurement exercise for the provision of the Council's boroughwide Arboriculture Services.

### **Recommendations:**

Cabinet is requested to:

- 1) Grant approval to commence a procurement exercise, subject to consultation with the Portfolio Holders for Environment and Community Safety and Finance and Human Resources, for the selection of a provider to deliver the boroughwide Arboriculture Services Contract.
- 2) Approve the tender documents.
- 3) Delegate authority to the Corporate Director for Place, following consultation with the Portfolio Holders for Environment and Community Safety and Finance and Human Resources to make any changes required to the tender documents, finalise the procurement exercise.
- 4) Delegate authority to the Corporate Director of Place, following consultation with the Portfolio Holders for Environment and Community Safety and Finance and Human Resources and the Director of Finance, following a competitive and compliant procurement process, to award and appoint the provider for the Arboriculture Services Contract requirement.

### **Reason: (For recommendations)**

To ensure the Council fulfils its statutory responsibilities to maintain its Arboriculture Assets.

## **Section 2 – Report**

### **Introductory paragraph**

- 1) Harrow has a statutory duty to maintain its arboriculture assets. The Council is responsible for the management of all trees on Council owned land including trees on the public highway, parks, allotments, cemeteries, woodlands and open spaces. The Council also manages and maintains trees on a number of Schools and Housing Sites. The current tree stock stands at circa 300,000 trees.
- 2) The Council fulfils its functions via a third-party contract which expires at the end of February 2024. There is no option to extend this contract and so a procurement exercise needs to be undertaken to ensure a contract is in place by 1st March 2024.

3) The services to be procured include the following:

- Tree surveys where requested in preparation for maintenance programme
- Planned cyclical maintenance to trees on streets, in school grounds and on Housing Estates where requested
- Ad-hoc tree works as requested; i.e. tree and stump removal; reduction pruning; crown lifting, removal of stem and basal growth as requested
- Tree planting as per annual planting programme
- Ceremonial tree planting as requested
- Standby emergency service 365 days
- Removal of dead and/or dying trees, and
- Specialist support in dealing with insurance claims

### **Options considered**

5) The following options were considered:

- 6) **Option 1:** Provide the service in-house - this option was discounted as it is estimated to be a less cost-effective way of providing these services. There is a mature market of Arboriculture service providers, and this has enabled costs for an external service to be more cost-effective due to the economies of scale associated with operating multiple contracts.
- 7) **Option 2:** Procure via a compliant framework – frameworks were investigated and were found to be geared towards estates tree maintenance by non-specialist facilities management providers, therefore this option was discounted as it is unlikely that frameworks will provide the opportunity for the Council to maximise best value for its specific requirements.
- 8) **Option 3:** Procurement exercise via an open tender process - this is the option that is being proposed as it allows the Council the opportunity to set out its specific requirements and an evaluation mechanism that will provide the maximum opportunity for a best value contract.

### **Ward Councillors' comments**

9) None as it impacts on all Wards

### **Risk Management Implications**

10) The risk associated with this procurement is mainly financial and relates to the Council being unable to find suitable affordable proposals. This risk will be managed in the procurement process via an evaluation mechanism that provides the balance between price and quality.

11) Risk included on Directorate risk register? No

12) Separate risk register in place? Yes

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

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

<b>Risk Description</b>	<b>Mitigations</b>	<b>RAG Status</b>
The Council is unable to find financially suitable and affordable proposals to maintain its arboriculture stock of some 300,000 trees	<ul style="list-style-type: none"><li>▪ Undertaking a competitive tender exercise will generate competition and deliver best in market value.</li><li>▪ A soft market testing exercise has indicated that the proposed contract specification is deliverable within available budgets.</li><li>▪</li></ul>	<b>GREEN</b>

## Procurement Implications

15) The estimated contract value is above the Public Contract Regulations 2015 for a restricted process. (PCR's) threshold for services and as such the tender will be conducted as a compliant regulated process consistent with the Councils Contracts Procedure Rules (CPR's).

16) Bidders will be required to provide technical and commercial submissions, with all Tenders being evaluated for both their technical and commercial suitability in relation to the Councils requirements.

17) The high-level evaluation criteria for this procurement is 60% price weighting and 40% quality.

## Legal Implications

18) The Cabinet report is seeking approval to commence a tender activity. In accordance with the Council's Contract Procedure Rules, (Table 1 Authorisation and Acceptance Thresholds) approval to procure contracts with a value of £500k plus should be obtained by completing a Cabinet Report and having a Cabinet decision prior to any tender activity commencing.

19) Any procurement of supplies, services, and works over the current Financial Thresholds requires a UK Notice and advertising.

- 20) The procurement process will be conducted in accordance with the Public Contract Regulations 2015 (the "Regulations") (PCRs) and the Council's Contract Procedure Rules (CPRs).
- 21) The tendering process must comply with the EU Procurement principles of equal treatment, transparency, mutual recognition and proportionality. As the total value of the contract will exceed the procurement threshold for services and it will be necessary to advertised and tendered via the London Tenders Portal and Contracts Finder using a open procedure in accordance with the Council's Contract Procedure Rules.
- 22) The Transfer of Undertakings (Protection of Employment) Regulations 2006" as amended by the "Collective Redundancies and Transfer of Undertakings (Protection of Employment) (Amendment) Regulations 2014" (TUPE) may apply and officers will be required to give due consideration to the implications of the transfer of staff during the tender process.

## **Financial Implications**

- 23) The majority of costs of the Arboriculture contract are currently funded from the revenue budget within the Traffic Highways and Asset Management Service, supplemented by s106 contributions allocated for trees work as well successful grant funding bids.
- 24) The revenue budget in 23/24 is £200k for trees related work.
- 25) The level of S106 funding available for trees is stipulated by the individual s106 agreements and is normally for specific geographical areas. Other external funding is subject to successful funding bids. Works will only be commissioned if the funding is made available.

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

- 26) There are no equalities implication to this decision.

## **Council Priorities**

### **Restoring Pride in Harrow and Putting Residents First**

- 27) The proposal meets the Council's vision to restore pride in Harrow and put residents first. Good maintenance of public trees greatly enhances Boroughwide appearance and public safety. The procurement also ensures the continuation of the range of environmental and social benefits that trees provide.

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

**Statutory Officer: Jessie Man**

Signed on behalf of the Chief Financial Officer

**Date: 4<sup>th</sup> July 2023**

**Statutory Officer: Patricia Davila**

Signed on behalf of the Monitoring Officer

**Date: 10<sup>th</sup> July 2023**

**Chief Officer: Dipti Patel**

Signed by the Corporate Director

**Date: 3<sup>rd</sup> July 2023**

**Head of Procurement: Nimesh Mehta**

Signed by the Head of Procurement

**Date: 27<sup>th</sup> June 2023**

**Head of Internal Audit: Neale Burns**

Signed on behalf of/by the Head of Internal Audit

**Date: 27<sup>th</sup> June 2023**

**Has the Portfolio Holder(s) been consulted? Yes**

## **Mandatory Checks**

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

**EqlA carried out:** NO, there are no equalities implications to this decision as it covers all wards

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

**Contact:** Tony Donetti - Infrastructure Manager

[tony.donetti@harrow.gov.uk](mailto:tony.donetti@harrow.gov.uk)

**Background Papers:** None

**Call-in waived by the Chair of Overview and Scrutiny Committee - NO**



**Report for: Cabinet**

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<b>Date of Meeting:</b>	27 <sup>th</sup> July 2023
<b>Subject:</b>	Procurement of Estate Improvements and Roofing Renewals
<b>Key Decision:</b>	Yes - procuring the service will exceed the threshold of £500k
<b>Responsible Officer:</b>	Dipti Patel Corporate Director Place David McNulty Director of Housing
<b>Portfolio Holder:</b>	Councillor Mina Parmar Portfolio Holder for Housing
<b>Exempt:</b>	No, except for appendices 1 - 19 which are exempt by virtue of Paragraph 3 of Schedule 12A of the Local Government Act 1972 because they contain information relating to the financial & business affairs of the council.
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All Wards
<b>Enclosures:</b>	<b>Appendix 1</b> – Draft ITT Mountside Estate (Exempt) <b>Appendix 2</b> – Articles of Agreement - JCT MW Mountside Estate (Exempt) <b>Appendix 3</b> – Mountside Estate Specification (Exempt) <b>Appendix 4</b> – Draft ITT Stonegrove Gardens (Exempt) <b>Appendix 5</b> – Articles of Agreement - JCT MW Stonegrove Gardens Exempt) <b>Appendix 6</b> – Specification - Stonegrove Gardens (Exempt) <b>Appendix 7</b> – Draft ITT Amy Johnson Court <b>Appendix 8</b> Articles of Agreement - JCT MW Amy Johnson Court (Exempt) <b>Appendix 9</b> – Amy Johnson Court Specification (Exempt) <b>Appendix 10</b> – Draft ITT Beatty Road (Exempt)

**Appendix 11** – Articles of Agreement – JCT MW Beatty Road Exempt)

**Appendix 12** – Specification - Beatty Road (Exempt)

**Appendix 13** – Draft ITT Park Gates, Tregenna & Arundel (Exempt)

**Appendix 14** – Articles of Agreement - JCT MW Park Gates, Tregenna & Arundel (Exempt)

**Appendix 15** – Park Gates, Tregenna & Arundel Specification (Exempt)

**Appendix 16** - Draft ITT Emergency Lighting - 2 (Exempt)

**Appendix 17** – Articles of Agreement - JCT MW Emergency Lighting - 2 (Exempt)

**Appendix 18** – Emergency Lighting – 2 Specification (Exempt)

**Appendix 19** 3-Year Capital programme (Exempt)

**Equalities Impact Assessment**



## Section 1 – Summary and Recommendations

This report requests Authority from Cabinet to procure Estate Improvements and Roofing Renewals across various wards in the borough, as part of the HRA (Housing Revenue Account) Capital Programme using the open tender procedure.

It is envisaged that this approach would attract local and sub regional Small and Medium Enterprises (SMEs) and specialist contractors to tender for either the general Estate Improvements and Roofing works to each estate and the Emergency Lighting – 2 upgrade works to various blocks across the borough which will be carried out over 2 years

The London Borough of Harrow recognise that it is vital that SME's are given the opportunity to be successful in winning public sector construction contracts as they employ local people including apprenticeship schemes, and they also typically spend money with local suppliers and other businesses in the local economy.

### **Recommendations:**

Cabinet is requested to:

1. Grant approval for officers to undertake 6 competitive procurement exercises for the selection of contractors to deliver Estate improvements works to Beatty Road and Stonegrove Gardens, Roof Renewal works to Park Gates, Tregenna and Arundel Courts and Amy Johnson Court, Estate improvements and Roof Renewal works to Mountside Estate and Emergency Lighting - 2 upgrade works to various blocks across the borough which will be carried out over a 2-year period, and for the procurement process for the Emergency Lighting -2, Stonegrove Gardens, Mountside Estate and Amy Johnson Court workstreams project to be commenced within 12 weeks.

These schemes will form part of the 2023/24 & 2024/25 Housing Capital Programmes. The combined value of the Mountside Estate; Amy Johnson; Stonegrove Gardens; Beatty Road; Park Gates Tregenna & Arundel schemes and the Emergency Lighting 2-year programme is £6.234M and this will be funded from HRA capital resources in financial years 23/24 (£ 3.681m) and 24/25 (£2.553m).

2. Delegate authority to the Corporate Director for Place, following consultation with the Portfolio Holder for Housing, to make any changes required to the tender documents following approval.
3. Approve the tender documents

4. Delegate authority to the Corporate Director of Place, following consultation with the Portfolio Holder for Housing and Portfolio Holder for Finance and Human Resources and the Director of Finance, following a competitive and compliant procurement process, to award and appoint contractors for each of the 6 tenders in this detailed in this report.

**Reason: (For Recommendations)** Cabinet authorisation is required to comply with the Council's Contract Procedure Rules and Financial Regulations, due to the aggregate estimated value of the potential contracts.

## **Section 2 – Report**

### **1.0 Introduction**

- 1.1 The Council have embarked on a 3-year Housing Capital Programme. As such the Council is looking to procure a two-year programme for Emergency Lighting - 2 Upgrades to various blocks across the borough and carry out Estate Improvements and/or Roofing renewals to 5 key Estates in the borough.
- 1.2 Cabinet approval is required to begin the process of procuring contractors for all projects with an estimated value in excess of £500k.
- 1.3 These programmes will run as 6 separate tenders as the Estate Improvements are tailor made to each estate and the Emergency Lighting Upgrades will be carried out by a specialist contractor. It is intended to procure through the open market to achieve additional value for money using the London Tenders Portal.
- 1.4 **Emergency Lighting - 2**  
The aim of the Emergency Lighting Programme is to deliver the second and final tranches of Emergency Lighting on a combined 2-year programme. The works will include Emergency Lighting upgrades and rewiring to the Landlords Communal parts to improve the means of escape to London Borough of Harrow's housing stock general blocks. The result is improved block fire safety lowering the risk of electrical fires, improved safety in communal circulation areas having emergency backup lighting in the event of power failure, reduced energy needs with the installation of LED fittings and low to full light sensor lights to reduce energy when there are periods of inactivity making for further energy savings.
- 1.5 **Stonegrove Gardens Estate Improvements**  
The aim of the Estate improvements to Stonegrove Gardens Estate is to address disrepair issues of paving, hard standings, fencing, walkways, drying areas, pram sheds, bin stores and communal flooring. The

proposals also include the installation of dropped curbs for disabled access and the proposed bin stores.

**1.6 Beatty Road Estate Improvements**

The aim of the Estate improvements to Beatty Road is to Erect full scaffolding to all blocks to renew facia boards/soffits, downpipes, guttering, pointing and brickwork repairs, full redecorations to all externals and communal parts, renewal and re-bedding of external paving.

**1.7 Park Gates, Tregenna and Arundel Courts - Roofing Renewal**

The aim of the Roofing Upgrades to Park Gates, Tregenna and Arundel Courts is to upgrade the concrete roof coverings and their associated rainwater goods to these blocks as they have reached and surpassed their life cycle. The works will involve Re-roofing (inc. fire compartmentation where missing), new rainwater goods, new eaves, soffits & facias, new high level timber boxings and high-level window cornices, Asbestos removal to impacted high level elements where required and repair and redecoration to high level exterior render.

**1.8 Amy Johnson Court - Estate Improvements and Roofing Renewal**

The aim of the Estate Improvements and Roofing Upgrades to Amy Johnson Court is to have full redecorations to all external and communal parts, resurfacing of communal walkways, renewal of external paving and re-bedding of paving slabs, renewal of main entrance doors and door entry system, new ceilings to communal staircases, new roofing to main building and extensions, new facia boards, soffits, down pipes and guttering. The roofing elements have also surpassed their life cycle.

**1.9 Mountside Estate - Estate Improvements and Roofing Renewal**

The aim of the Estate Improvements and Roofing Renewal to Mountside Estate is to address health and safety concerns of external communal areas caused by structural issues on the Site. The Improvements will also include drying areas, window upgrades that have reached and surpassed their life cycle. The flat roofs, soffit boards and rainwater goods to all blocks will also be renewed as they have surpassed their life cycle and are no longer economical to repair.

## **2.0 Options Considered**

**2.1 Option 1: To undertake a single procurement for all of the Emergency Lighting, Estate Improvements and Roofing Renewals schemes together for a single contractor to undertake**

Appointing a single contractor to undertake Emergency Lighting, Estate Improvements and Roofing Renewals to blocks and estates across the borough would attract large scale contractors that would sub-contract the works and programmes would be subject to high preliminary costs and management fees.

- 2.2 **Option 2: To undertake procurements for the proposed Estate Improvements and Roofing Renewals to each individual estate separately and Emergency Lighting 2 Year Programme separately**  
This would attract local SMEs for each procurement and would ensure the delivery of the life of the contracts as each separate contract will be able to run independently. All contracts are to be procured via the open tender process.
- 2.3 **Option 3: Do nothing.**  
This would mean elements of these 5 estates would fall into disrepair and compromise residents' Health & Safety. This would mean an increase in revenue/repair costs and complaints from residents. The lack of improved Emergency lighting would also compromise residents' Health & Safety and would make blocks non-compliant to the current regulations.
- 2.4 The recommended option is **Option 2: To undertake procurements for the proposed Estate Improvements and Roofing Renewals to each individual estate separately and Emergency Lighting 2 Year Programme separately.** The council believes it would be more beneficial to tender each of these workstreams separately to attract specialist contractors and SMEs and ensure best value is achieved. All contracts are to be procured via the open tender process. The advantage of 2-year contract for the Emergency Lighting Upgrades would be to build a relationship with a single contractor obtaining value for money as opposed to 2 separate year on year procurements which can incur delays and result in different contractors delivering to different standards.

### **3.0 Background**

- 3.1 **Emergency Lighting - 2**  
This 2-year programme will follow the first tranche of the Emergency Lights and Rewiring programmes to the Landlords Communal parts to improve the means of escape to London Borough of Harrow's housing stock general blocks. The Emergency Lights Programmes have complemented the Security and Compliance Homesafe programmes Homesafe -1, 2, and 3.
- 3.2 The blocks on this programme represent works that our planning team has identified as priorities as landlord's electrical systems are more than 30-years old. Additionally, these General housing blocks do not currently have emergency lighting to escape and circulation routes. The upgrade works have been identified as necessary to improve Harrow's Stock and residents and visitor safety by meeting compliance requirements.
- 3.3 The replacement hardware elements will have a service life of 10-years, (emergency lights and alarm systems require a cyclical 10-years renewal of hardware) the landlords communal rewire 30 years. The rewire and Emergency lights system will enhance security, safety and wellbeing and access for all who live or visit these blocks whilst meeting the Council's

landlord responsibilities for on-going maintenance, fire safety and duty of care.

<b>Table 3.a – Emergency Lighting Units (Blocks)</b>			
<b>Elements</b>	<b>2023/24</b>	<b>2024/25</b>	<b>2-Year Programme Total</b>
<b>Emergency Lighting Upgrade (Blocks)</b>	40	95	135

- 3.4 As they are all mixed tenancy Blocks some of the properties on this programme are subject to Section 20 of Landlord & Tenant Act 1985 (as amended) processes. We have a fully validated stocklist of 40 blocks for year 1 and 95 blocks for year 2. This programme will see all of the blocks upgraded until the next renewal cycle due in 2029/2030.
- 3.5 Site surveys are currently underway for the 135 blocks planned to undergo emergency lighting upgrades and rewiring. These surveys are due to be finalised in late September. Per s14.4 of the Contract Procedure Rules, a procurement process must be initiated within eight weeks of cabinet approval, unless otherwise approved by Cabinet. This report recommends that with cabinet approval, the tender process will be commenced within 12 weeks, so as to ensure comprehensive surveys can be completed to inform the tender specification.
- 3.6 **Stonegrove Gardens Estate Improvements**  
The Stonegrove Gardens Estate consists of 115 properties in various archetype blocks, 3 terraced bungalows and a Nursery all accessed by the Stonegrove Gardens Road. Along with addressing the various disrepair issues, proposals will also aim to tackle the issues with the existing estate carpark that has had long-standing drainage issues and lack of sufficient lighting, which has caused over-use of the street parking which in turn leads to refuse trucks not being able to access the properties at the rear of the estate. New enclosed bin stores will negate the current need of bins to be wheeled through some of the blocks the day before collection.
- 3.7 As the estate has mixed tenancy properties, some of the properties on this programme are subject to Section 20 of Landlord & Tenant Act 1985 (as amended) processes.
- 3.8 **Beatty Road Estate Improvements**  
Beatty Road forms part of the Glebe Estate in Stanmore and consists of 121 properties in 5 blocks on a cul-de-sac off Beatty Road. The proposals will see upgraded rainwater goods, pointing and brickwork repairs, full redecorations to all externals and communal parts and renewal and re-bedding of external paving that had posed a health & safety risk.

- 3.9 As the estate has mixed tenancy blocks, some of the properties on this programme are subject to Section 20 of Landlord & Tenant Act 1985 (as amended) processes.
- 3.10 **Park Gates, Tregenna and Arundel Courts - Roofing Renewal**  
Park Gates, Tregenna & Arundel Courts are 3 purpose-built residential housing blocks on Alexandra Avenue. Long standing leaks are incurring repairs costs each year and the roofs are in urgent need of replacement to make them weatherproof and prevent water ingress. The roofing upgrades will also include much needed fire compartmentation works and new high level timber boxings, window cornices, and render. Added benefits of carrying out the roofing upgrade will be increased roofing insulation which in turn would increase the EPC rating of the properties in the blocks. These works will make the blocks less susceptible to damp and mould hereby improving the health and well-being of our residents.
- 3.11 As the blocks consist of mixed tenancy properties, some of the properties on this programme are subject to Section 20 of Landlord & Tenant Act 1985 (as amended) processes.
- 3.12 **Amy Johnson Court - Estate Improvements and Roofing Renewal**  
Amy Johnson Court is a purpose-built residential housing block made of 2 Sub-blocks that consist of 15 properties. The roofing elements have also surpassed their life cycle and the communal walkways and block paving are due some much needed resurfacing
- 3.13 As the sub-blocks consist of mixed tenancy properties, some of the properties on this programme are subject to Section 20 of Landlord & Tenant Act 1985 (as amended) processes.
- 3.14 **Mountside Estate - Estate Improvements and Roofing Renewal**  
Mountside Estate consists of 4 blocks with 22 properties. The estate is on a slope and structural issues have lead to uneven paving, walls and stairways to the external communal areas. The windows and integrated panels are due for replacement and the flat roofs, soffit boards and rainwater goods to all blocks have surpassed their life cycle and are no longer economical to repair.
- 3.15 As the estate has mixed tenancy blocks, some of the properties on this programme are subject to Section 20 of Landlord & Tenant Act 1985 (as amended) processes.
- 3.16 Section 20 of the Landlord and Tenant Act 1985 requires that the Council consult leaseholders. This has yet to be commenced for the Stonegrove, Mountside and Amy Johnson workstreams. Per section 14.4 of the Contract Procedure Rules, a procurement must be initiated within eight weeks of cabinet approval, unless otherwise approved by Cabinet. This report recommends that with cabinet approval, the tender process for these projects will be commenced within 12 weeks. This will ensure that the Council complies with this requirement and consults leaseholders prior to any procurement process.

- 3.17 The Tender exercise for all the above procurements will follow Harrow's standard weighting of:  
Price/Commercial – 60%, Quality/Technical – 30%, Social Value, 10%

## 4.0 Performance Issues

- 4.1 The contractors will be managed effectively from mobilisation through each project, by the Planned Investment Team. Performance statistics will be reviewed monthly and monitored. Effective and regular communication between the contractors and the Council whilst works are underway will ensure progress with delivery.
- 4.2 The works will be covered for a DLP (Defects Liability Period) for 1 year from commission. Our in-house Clerk of Works will be inspecting works on completion to ensure any snagging is carried out straight away. If the contractor encounters any repairs out of the scope of works, they will notify the Contract Administrator and we will either instruct the contractor to carry out the repair or refer to our term contractor or specialist depending on urgency and/or type of works.
- 4.3 In addition we intend to form monthly project groups, inviting residents and Members to support the management and monitoring of the schemes throughout their implementation.
- 4.4 KPI Suite
- 1) **Client/resident Satisfaction:** Target min 90%
  - 2) **Cost Predictability:** monthly analysis of projected Final Account against Contract Sum and Actuals monthly valuations against forecast cash flows: Target: within 10% of forecast.
  - 3) **Quality:** Properties offered to the client as completed: Target 85% no defects. Individual Properties: 5% reduction for every 3<sup>rd</sup> defect. Max 5-defects per Property. 10% reduction per defect over 5 defects.
  - 4) **Time Predictability:** Monthly analysis of Actual time against original submitted programme. Target 90% delivery against contract period allowing for any issued contract extensions of time.
  - 5) **Safety:** Record all site safety incidents or 'near misses' and RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations) Incidents. Target 100% no incidents

## 5.0 Environmental Implications

- 5.1 It is the intention of the Asset Management Team that the delivery of all contracts will contribute to the Council's objectives around social, economic, and environmental sustainability. We aim to do all we can to ensure that we support Harrow's economy by buying locally wherever practical and maximise opportunities for local people in employment

and training. The contract specification will ensure that tenders provide detailed information about their contribution to the environment and sustainability and by looking for a framework of contractors we hope to procure small, local contractors who will be better placed to employ a local workforce.

## 6.0 Risk Management Implications

- 6.1 The risks relating to the delivery of the Capital Programme will be included in the Housing Risk Register which contains overarching risks in relation to delivery of the Capital Programme. Specific risks will be monitored on the project as it moves forward.
- 6.2 In addition risks are identified and monitored for each individual project undertaken within the service. The contractors are responsible for completing a risk assessment.

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
If the recommendations are not accepted many Blocks will fail to meet compliance regulations of fire compartmentation and resident safety	<ul style="list-style-type: none"> <li>Acceptance of the recommendations in this report will mitigate this risk</li> </ul>	<b>GREEN</b>
If the recommendations are not accepted there will be an increase in tenant dissatisfaction and complaints, disrepair claims and repair costs	<ul style="list-style-type: none"> <li>Acceptance of the recommendations in this report will mitigate this risk</li> </ul>	<b>GREEN</b>
Materials shortages and cost and delivery issues increase costs on the contract	<ul style="list-style-type: none"> <li>We will ensure programmes are turned around efficiently to avoid any delays which could aggravate inflation pressures.</li> <li>We will pre-order materials where we can</li> </ul>	<b>AMBER</b>
The procurement process is not undertaken in compliance with Public	<ul style="list-style-type: none"> <li>We will work closely with the Council's procurement team throughout the</li> </ul>	<b>GREEN</b>



Risk Description	Mitigations	RAG Status
Procurement Regulations and the Council's Contract Procedure Rules and Financial Regulations	<p>procurement to ensure compliance</p> <ul style="list-style-type: none"> <li>▪ We will use open market procurement routes as permitted by the Public Contract Regulations 2015.</li> </ul>	
Specialist contractors are not attracted to the work during the procurement of the contract and these contractors are required for project success	<ul style="list-style-type: none"> <li>▪ By tendering to the 'Open Market tender' and listing the elements of work specific to the projects in the Invitations To Tender contractors will be sourced.</li> <li>▪ Contractors will be experienced and have knowledge in delivering in these areas of work.</li> </ul>	<b>GREEN</b>
Arrangements for contract management are not adequate or effective leading to poor quality work and delays on the contract	<ul style="list-style-type: none"> <li>▪ Contractors will be overseen and managed by the Planned Investment Team</li> <li>▪ Contracts are adequately resourced internally and also inspected and quality assured by a dedicated Clerk of Works.</li> <li>▪ Performance statistics will be reviewed monthly and monitored at monthly project meetings.</li> <li>▪ There will be effective and regular communication between the contractors and the Council whilst works are underway to ensure progress with delivery.</li> <li>▪ We intend to form monthly project groups, inviting residents and Members to support the management and monitoring of the schemes throughout their implementation.</li> <li>▪ Works are covered for a DLP (Defects Liability Period) for 1 year from commission.</li> </ul>	<b>GREEN</b>
The pricing in the submissions are in excess of the budgetary envelope	<ul style="list-style-type: none"> <li>▪ We have applied costs of current contracts with a 15% uplift to alleviate inflationary pressures.</li> <li>▪ We have also included a 5% client-side contingency</li> </ul>	

## 8.0 Procurement Implications

- 8.1 The estimated value of each procurement is below the Public Contracts Regulations 2015 financial threshold for Works contracts. All procurements arising from this report will be advised on and supported by the procurement team and will be conducted in compliance with the Public Contract Regulations 2015 and the Councils Contract Procedure Rules.
- 8.2 Bidders will be required to provide technical and commercial submissions, with all Tenders being evaluated for both their technical and commercial suitability in relation to the Authority's Requirements.
- 8.3 The proposed procurement process will be the open tender procedure; this will allow for bids from local SMEs and specialist contractors.

Bidders will be measured on both their quality and commercial submissions. The Most Economically Advantageous Tender will be recommended for award of the contract.

## 9.0 Legal Implications

- 9.1 The Council has the power under s.1(1) Localism Act (2011) to do anything individuals generally may do, providing it is not prohibited by legislation and subject to public law principles.
- 9.2 Under s.111 Local Government Act (1972) local authorities may do anything which is calculated to facilitate or is conducive or incidental to the discharge of their functions. The requirement of the Council to ensure adequate and satisfactory housing/living conditions within its district, as outlined in this report, is consistent with this power.
- 9.3 The proposed renewal programmes will help contribute to the achievement of the Council's social, economic and environmental objectives and will ensure that the quality of the Council's housing stock is in line with Decent Homes Standards. Furthermore, the Council, by conducting these respective procurements, is fulfilling its statutory duties and ensuring compliance with (i) Housing Act (1957) which states that a local authority may provide housing accommodation by altering, repairing or improving any buildings which have been acquired by the local authority and (ii) Landlord & Tenant Act (1985)(as amended) given some of the properties on the respective programmes are subject to s.20 consultation processes.
- 9.4 The Council must comply with its Constitution and its Contract Procedure Rules (CPRs). The total estimated value (including VAT) of each programme is below the financial threshold for public works under the Public Contracts Regulations (2015) (PCRs (2015)). Therefore, the respective procurement exercises to be conducted, are not caught by the PCRs (2015).

- 9.5 The Council's Procurement team has advised that an open tender procedure in accordance with the Council's CPRs will be carried out (whilst also being mindful of the overarching procurement principles. Conducting an open tender process will ensure that a robust, fair, transparent and non-discriminatory competitive process is conducted, to enable selection of contractors who have demonstrated (i) good technical ability; (ii) good financial standing and (iii) with solutions that will provide value for money.
- 9.6 As the estimated value of each programme outlined in this report is above £500,000, approval to procure must be obtained by way of a Cabinet Report, as required under the Council's CPRs (*Table 1 Authorisation and Acceptance Thresholds*).
- 9.7 Any legal agreements (and ancillary documents where relevant) arising from the matters described in this report must be in a form approved by legal services (HB Public Law) on behalf of the Director of Legal and Governance. HB Public Law has been duly instructed and will assist with preparation of the respective contracts.

## 10.0 Financial Implications

- 10.1 This report seeks approval for a total allocation of £6,234m over the 2 financial years of HRA capital programme, 2023/24 and 2024/25 as set out below:

Capital scheme	Year 1-2023/24	Year 2 -2024/25	Total
<b>Emergency Lighting - 2</b>	540,500	1,517,671	<b>2,058,171</b>
<b>Stonegrove Gardens – Estate Improvements</b>	575,000	517,500	<b>1,092,500</b>
<b>Beatty Road – Estate Improvements</b>	662,400	0	<b>662,400</b>
<b>Park Gates Tregenna &amp; Arundel– Roofing Replacements</b>	690,000	0	<b>690,000</b>
<b>Amy Johnson– Estate Improvements and Roofing Replacements</b>	638,250	0	<b>638,250</b>
<b>Mountside - Estate Improvements and Roofing Replacements</b>	575,000	517,500	<b>1,092,500</b>
<b>TOTAL</b>	<b>3,681,150</b>	<b>2,552,671</b>	<b>6,233,821</b>

- 10.2 The total 2-year estimated expenditure of £6.234M will be funded from HRA Planned Investment capital programme budgets of £8.428m in 2023/24 and £8.428m 2024/25.

- 10.3 The tables below set out the profile of the expenditure across years and estimated costs against expenditure categories for each programme.

<b>10.3a Table 1: Emergency Lighting – 2</b>			
<b>Emergency Lighting - 2</b>	<b>Spend 2023-24</b>	<b>Spend 2024-25</b>	<b>2-Year Programme Budget</b>
	<b>£</b>	<b>£</b>	<b>£</b>
Works	470,000	1,319,714	<b>1,789,714</b>
Client Contingency 5%	15,300	65,986	<b>81,286</b>
Asbestos Surveys & Removals and Enabling works	15,000	31,000	<b>46,000</b>
Staffing	36,700	98,000	<b>134,700</b>
CDM – Construction Design Management Fee	3000	3000	<b>6,000</b>
Legal	500		<b>500</b>
<b>Total Emergency Lighting - 2</b>	<b>540,500</b>	<b>1,517,700</b>	<b>2,058,200</b>

<b>10.3b Table 2: Stonegrove Gardens – Estate Improvements</b>			
<b>Stonegrove Gardens – Estate Improvements</b>	<b>Spend 2023-24</b>	<b>Spend 2024-25</b>	<b>2-Year Budget</b>
	<b>£</b>	<b>£</b>	<b>£</b>
Works	500,000	450,000	<b>950,000</b>
Client Contingency 5%	25,000	22,500	<b>47,500</b>
Asbestos Surveys & Removals and Enabling works	16,500	15,000	<b>31,500</b>
Staffing	30,000	30,000	<b>60,000</b>
CDM – Construction Design Management Fee	3000	0	<b>3,000</b>
Legal	500	0	<b>500</b>
<b>Total Stonegrove Gardens – Estate Improvements</b>	<b>575,000</b>	<b>517,500</b>	<b>1,092,500</b>

<b>10.3c Table 3: Beatty Road – Estate Improvements</b>	
<b>Beatty Road – Estate Improvements</b>	<b>Spend 2023-24</b>
	<b>£</b>
Works	576,000
Client Contingency 5%	28,800
Asbestos Surveys & Removals and Enabling works	15,000
Staffing	39,100
CDM – Construction Design Management Fee	3000
Legal	500
<b>Total Beatty Road Estate Improvements</b>	<b>662,400</b>

<b>10.3d Table 4: Park Gates Tregenna &amp; Arundel– Roofing Replacements</b>	
<b>Park Gates Tregenna &amp; Arundel– Roofing Replacements</b>	<b>Spend 2023-24</b>
	<b>£</b>
Works	600,000
Client Contingency 5%	30,000
Asbestos Surveys & Removals and Enabling works	21,500
Staffing	35,000
CDM – Construction Design Management Fee	3000
Legal	500
<b>Total Park Gates Tregenna &amp; Arundel– Roofing Replacements</b>	<b>690,000</b>

<b>10.3e Table 5: Amy Johnson– Estate Improvements and Roofing Replacements</b>	
<b>Amy Johnson– Estate Improvements and Roofing Replacements</b>	<b>Spend 2023-24</b>
	<b>£</b>
Works	555,000
Client Contingency 5%	27,750
Asbestos Surveys & Removals and Enabling works	22,000
Staffing	30,000
CDM – Construction Design Management Fee	3000
Legal	500
<b>Total Amy Johnson– Estate Improvements and Roofing Replacements</b>	<b>638,250</b>

<b>10.3f Table 6: Mountside - Estate Improvements and Roofing Replacements</b>			
<b>Mountside - Estate Improvements and Roofing Replacements</b>	<b>Spend 2023-24</b>	<b>Spend 2024-25</b>	<b>2-Year Budget</b>
	<b>£</b>	<b>£</b>	<b>£</b>
Works	500,000	450,000	<b>950,000</b>
Client Contingency 5%	25,000	22,500	<b>47,500</b>
Asbestos Surveys & Removals	16,500	15,000	<b>31,500</b>
Staffing	30,000	30,000	<b>60,000</b>
CDM – Construction Design Management Fee	3000	0	<b>3,000</b>
Legal	500	0	<b>500</b>
<b>Total Mountside - Estate Improvements and Roofing Replacements</b>	<b>575,000</b>	<b>517,500</b>	<b>1,092,500</b>

- 10.4 There will be no requirement to borrow and no implication on the General fund as a result of these procurements as the programme is fully funded through HRA resources.

10.5 The service will ensure eligible costs in relation to these major works will be recovered from Leaseholders in accordance with the section 20 process.

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

11.1 The procurement exercise is designed to deliver existing policies and strategies maintaining the current level of equality in service provision. The contract specification will be very clear on the equalities related duties on contractors, given the wide range of needs of our customers.

11.2 An initial Equality Impact Assessment has been prepared for the delivery of the Home Improvement Agency. This identified no need for a full assessment at this stage because it did not identify any potential for unlawful conduct or disproportionate impact. All opportunities to address diversity and the individual needs of applicants be addressed through the contract specification and ensure residents receive the same service regardless but taking into account specific needs. We will address these in our tendering documents and processes. The assessment will be updated as the project moves forward.

## **12.0 Council Priorities**

- **A council that Puts Residents First**
- **A Borough that is Clean and Safe**
- **A place Where Those in Need are Supported**

12.1 The works on all programmes will be improving the homes of residents by upgrading estates and blocks across the borough.

12.2 Specifications for all contracts will ensure that the successful contractor is equipped to provide a high level of customer service to all our residents. In addition, every effort will be made to ensure that local businesses are encouraged to submit tenders and that added social value to support communities will be a part of the evaluation process.

12.3 Increasing energy efficiencies with new roofs with added insulation and making our estates and blocks safer with improved and safer communal spaces will positively impact those in need in the borough.

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

**Statutory Officer: Tasleem Kazmi**

Signed on behalf of the Chief Financial Officer

**Date: 30 June 2023**

**Statutory Officer: Magdaline Paraschou**

Signed on behalf of the Monitoring Officer

**Date: 26 June 2023**

**Chief Officer: Dipti Patel**

Signed off by the Corporate Director

**Date: 18<sup>th</sup> July 2023**

**Head of Procurement: Nimesh Mehta**

Signed by the Head of Procurement

**Date: 23 June 2023**

**Head of Internal Audit: Neale Burns**

Signed on behalf of the Head of Internal Audit via email

**Date: 28 June 2023**

**Has the Portfolio Holder(s) been consulted? Yes**

## **Mandatory Checks**

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

**During consultation we will notify & invite relevant Ward members impacted by the project.**

**YES** - An overarching EQIA was undertaken for the programme Directorate Equality Task Group.

**EqIA cleared by: Jennifer Rock**

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

Contact: Simbarashe Manjonjori, Interim Planned Investment Manager, Place Directorate, simbarashe.manjonjori@harrow.gov.uk, tel. 07927 548395

**Background Papers:** None

**Call-in waived by the Chair of Overview and Scrutiny  
Committee - No**



### You will need to produce an Equality Impact Assessment (EqIA) if:

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

Guidance notes on how to complete an EqIA and sign off process are available on the Hub under Equality and Diversity. You must read the [guidance notes](#) and ensure you have followed all stages of the EqIA approval process (outlined in appendix 1). Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: [Equality Impact Assessment](#) - sources of statistical information.

## Equality Impact Assessment (EqIA)

<b>Type of Decision:</b>	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
<b>Title of Proposal</b>	<b>Procurement of Estate Improvements and Roofing Renewals</b>	<b>Date EqIA created 26/06/23</b>
<b>Name and job title of completing/lead Officer</b>	Simba Manjonjori – Interim Planned Investment Manager	
<b>Directorate/ Service responsible</b>	Place Directorate	
<b>Organisational approval</b>		
<b>EqIA approved by the EDI Team:</b>	<b>Name: Jennifer Rock</b>  <b>Assistant Policy Officer</b> <b>EDI Team</b>	<b>Signature</b> <input checked="" type="checkbox"/> <b>Tick this box to indicate that you have approved this EqIA</b>  <b>Date of approval: 4.7.23</b>

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## 1. Summary of proposal, impact on groups with protected characteristics and mitigating actions

(to be completed **after** you have completed sections 2 - 5)

### a) What is your proposal?

The Council have embarked on a 3-year Housing Capital Programme. As such the Council is looking to procure a two-year programme for Emergency Lighting - 2 Upgrades to various blocks across the borough and carry out Estate Improvements and/or Roofing renewals to 5 key Estates in the borough.

These programmes will run as 6 separate tenders as the Estate Improvements are tailor made to each estate and the Emergency Lighting Upgrades will be carried out by a specialist contractor.

### b) Summarise the impact of your proposal on groups with protected characteristics

We do not anticipate that these projects will have a negative impact on Harrow residents or result in any direct or indirect discrimination of any group that shares protected characteristics.

Outcomes include physical improvements to Harrow's Estates and blocks.

### c) Summarise any potential negative impact(s) identified and mitigating actions

We do not anticipate that these projects will have a negative impact on Harrow residents or result in any direct or indirect discrimination of any group that shares protected characteristics.

2. Assessing impact																			
Protected characteristic		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact																	
For <b>each</b> protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.		Positive impact		Negative impact															
		Minor		Major															
		No impact																	
<b>Age</b>	<p>Harrow has a resident population of 261,300<sup>1</sup>. Increasing by 9.3% in the ten years between 2011 and 2021 with an increase of 7.8% in people aged 15 to 64 years, It has an above average working age population aged 16-64 of just under 64% (160,462) and a growing younger population aged 0-15 of 18.5% (48,300), which is higher than the London average, suggesting that the borough is a popular destination for families<sup>2</sup>.</p> <div style="text-align: center;"> <table border="1" style="margin: 0 auto; border-collapse: collapse;"> <caption>Population by Age-band % (Harrow 2021 Census)</caption> <thead> <tr> <th>Age Band</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>0-15</td> <td>20%</td> </tr> <tr> <td>16-24</td> <td>10%</td> </tr> <tr> <td>25-49</td> <td>37%</td> </tr> <tr> <td>50-64</td> <td>17%</td> </tr> <tr> <td>65-84</td> <td>13%</td> </tr> <tr> <td>85+</td> <td>2%</td> </tr> </tbody> </table> </div>	Age Band	Percentage	0-15	20%	16-24	10%	25-49	37%	50-64	17%	65-84	13%	85+	2%	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Age Band	Percentage																		
0-15	20%																		
16-24	10%																		
25-49	37%																		
50-64	17%																		
65-84	13%																		
85+	2%																		

<sup>1</sup> Census 2021

<sup>2</sup> Census 2021

	<ul style="list-style-type: none"> <li>As with most areas in the country, the borough has an ageing population. With the number of residents aged 65 plus Increasing by 19.4% in the ten years between 2011 and 2021 with 31% rise in people aged 90 years and over<sup>3</sup>. Those aged 85 plus could increase by 60% by 2030<sup>4</sup>.</li> <li>Data available shows that the pandemic has adversely impacted young people aged 18-24, with 1 in 10 young people out of work<sup>5</sup>.</li> <li>Harrow has one of the lowest proportions of young people Not in Education, Employment and Training (NEETS). However, due to the Covid-19 pandemic, there has been a significant increase in numbers, from 0.8% to 1.8%<sup>6</sup>. (Now 1.2% August 2022<sup>7</sup>)</li> </ul> <p><b>Impact</b> The projects will aim to be inclusive of all residents regardless of their age.</p>				
<b>Disability</b>	<ul style="list-style-type: none"> <li>The 2021 Census data shows that 9.75% of Harrow's population aged 15 to 64 years have a disability this equates to 16,840 people.</li> <li>There is a strong correlation between disability, in particular the extent of the disability, and economic inactivity.</li> <li>There are also particular groups that have specific obstacles in progressing to the labour market or sustaining self-employment. These include adults with learning disabilities and those with severe mental health issues.</li> <li>Disabled people are also likely to be under-represented among business owners within Harrow.</li> </ul> <p><b>Impact</b></p> <ul style="list-style-type: none"> <li>The projects will aim to be inclusive of all residents regardless of their disability status. The products specified on Estate Improvements and/or Roofing renewals</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>3</sup> Census 2021

<sup>4</sup> Poppi and Pansi projections to 2030

<sup>5</sup> DWP Job claimant data April 2021

<sup>6</sup> NEETS data at December 2020.

<sup>7</sup> NEETS data at December 2022.

	will be of a generic specification.				
<b>Gender reassignment</b>	<ul style="list-style-type: none"> <li>In 2020, the Equality and Human Rights Commission (EHRC) survey found that one in six respondents identified themselves as prejudiced towards transgender people<sup>8</sup>.</li> <li>There is limited national data collected for this characteristic. We will need to consider the inequalities and discrimination experienced for this protected group when data becomes available.</li> <li>The charity Gender Identity Research &amp; Education Society (GIRES) estimated in their Home Office funded study in 2009 the number of transgender people in the UK to be between 300,000 and 500,000. More recently Stonewall advised that it is estimated that around 1% of the population might identify as trans, including people who identify as non-binary. This would represent about 600,000 trans and non-binary people in Britain and about 2,500 people in Harrow.</li> </ul> <p><b>Impact</b></p> <ul style="list-style-type: none"> <li>The projects will aim to be inclusive of all residents regardless of their gender reassignment status.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Marriage and Civil Partnership</b>	<ul style="list-style-type: none"> <li>At the time of the 2021 Census 53.9% of Harrow's residents were married or in a registered civil partnership, which was the highest level in London.</li> <li>21% of households were married, or in same-sex civil partnerships, with dependent children, the highest level in London.</li> <li>At October 2020 there have been 144 Same Gender Civil Partnerships in Harrow, 25 of which has been converted to a Marriage. There have been 8 Opposite Gender Civil Partnerships. There have been 57 Same Sex marriages.</li> </ul> <p><b>Impact</b></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>8</sup> Equality and Human Rights Commission (2020), Attitudes transgender people, 2020

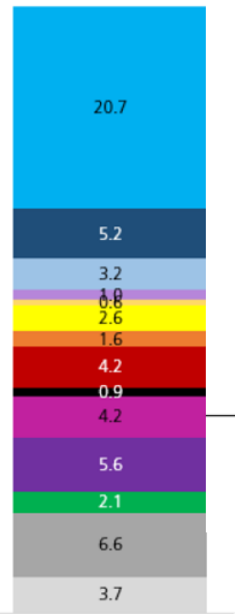
	The projects will aim to be inclusive of all residents regardless of their marriage and partnership status.				
<b>Pregnancy and Maternity</b>	<ul style="list-style-type: none"> <li>• ONS births figures show Harrow as having 3,312 live births in 2021<sup>9</sup>. 14 live births per 1000 population is higher than the England &amp; Wales average of 10.8</li> <li>• The borough has a higher-than-average infant mortality rate in London, at a rate of 3.9 deaths per 1000 live births, which is an indicator of poverty and inequality in the borough.<sup>10</sup></li> <li>• Nationally, women have faced discrimination during pregnancy and maternity in the workplace. EHRC Survey data shows that around one in nine mothers (11%) reported that they were either dismissed; made compulsorily redundant, where others in their workplace were not.</li> </ul> <p><b><u>Impact</u></b> The projects will aim to be inclusive of all residents regardless of their pregnancy and maternity status, including residents with childcare/caring responsibilities.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>9</sup> Source: Office for National Statistics (ONS, 2022), Live births in England and Wales 2021

<sup>10</sup> Public Health England (2022), London's Poverty Profile 2022,

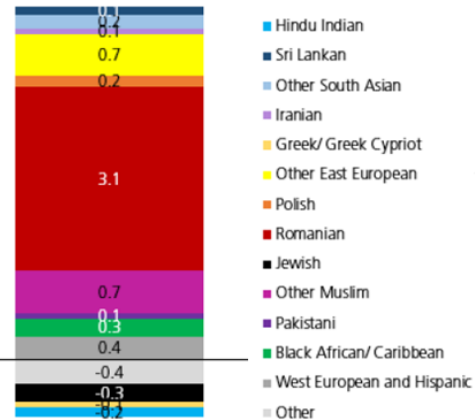
Race/  
Ethnicity

% breakdown of non-WB populations, 2019



Harrow (62.9% non-WB)

% breakdown of change in non-WB populations



- Harrow is one of the most culturally diverse local authorities in the UK, with over 60% of residents from Black, Asian, and Multi-Ethnic backgrounds and an estimated 20% Eastern European community, which is fast growing<sup>11</sup>. Black African (notably the Somali Community) groups have been fast growing over the last 6 years or so, as has the Afghan community.
- Unemployment rates are significantly higher in certain areas of the borough, particularly in the Wealdstone and Marlborough wards (central Harrow) and Roxbourne (south Harrow), focused in an around the Rayners Lane estate and among residents classified as Black and Other ethnic groups. These areas are also ranked high on the indices of deprivation for the UK.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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<sup>11</sup> Harrow Economic assessment 2019-2020: population



<p><b>Religion or belief</b></p>	<ul style="list-style-type: none"> <li>The majority of 16–18-year-olds that are classed as NEET are from Black and Multi Ethnic backgrounds and located in wards with high levels of deprivation. However, the data also shows that the single largest ethnic group of pupils aged 16-18 classed as NEET is White British.</li> <li>At ward level Marlborough, and Wealdstone have the highest number of households in need of re-housing. These respectively have a Black and Multi Ethnic population of 77% and 75%.</li> <li>The highest rates of overcrowding is in Greenhill ward (97.5 per 1,000 households) and a Black and Multi Ethnic population of 74% (2011 census).</li> <li>Over 94% of Harrow businesses are classed as micro-businesses. There is limited data on the profile of business ownership by protected characteristics. Anecdotal evidence suggests that most retail businesses in Harrow’s town centres are Black and Multi Ethnic - owned.</li> </ul> <p><b>Impact</b> The projects will aim to be inclusive of all residents regardless of their race and ethnicity.</p>																
<p><b>Religion or belief</b></p>	<ul style="list-style-type: none"> <li>Religious diversity is strong in Harrow. At the 2011 Census Harrow was the most religiously diverse borough in the country with the highest number Hindus (25%) and Jains (2.2%) and the second highest number of Zoroastrians.</li> <li>At the 2021 census Harrow had the highest number (and proportion) of Hindu followers in the country (25.8%). At 2.8% Harrow 's Jewish community was the ninth largest nationally. 33.9% of residents described themselves as Christians (the 11th lowest proportion in the country) and 15.9% described themselves as Muslims. Harrow had the lowest ranking for ‘no religion’ (10.9%).</li> <li>As the population’s ethnic composition changes, rates of participation in various religions are also likely to change<sup>12</sup>.</li> <li>There is limited data on employment/unemployment rates for Harrow by religion.</li> </ul> <div data-bbox="443 1230 1402 1596"> <p style="text-align: center;"><b>Harrow, Religion 2021 census</b></p> <table border="1"> <caption>Harrow, Religion 2021 census</caption> <thead> <tr> <th>Religion</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Other religion</td> <td>0.6%</td> </tr> <tr> <td>Sikh</td> <td>1.1%</td> </tr> <tr> <td>Buddhist</td> <td>1.1%</td> </tr> <tr> <td>Jain</td> <td>2.4%</td> </tr> <tr> <td>Jewish</td> <td>2.8%</td> </tr> </tbody> </table> </div>	Religion	Percentage	Other religion	0.6%	Sikh	1.1%	Buddhist	1.1%	Jain	2.4%	Jewish	2.8%	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> <p style="text-align: center;">8</p>
Religion	Percentage																
Other religion	0.6%																
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Buddhist	1.1%																
Jain	2.4%																
Jewish	2.8%																

<b>Impact</b>	The projects will aim to be inclusive of all residents regardless of their religion or beliefs.				
<b>Sex</b>	<ul style="list-style-type: none"> <li>The 2021 census show that the total population of Harrow is now 261,300, made up of 132,500 women (50.7%) and 128,800 men (49.3%). Overall, the number of males and females living in Harrow is very similar.</li> <li>Economic activity among Harrow's male population is higher than the London average at 86%, compared with 83%<sup>13</sup>. However, economic activity among females in the borough is lower than the London average at 72%.</li> <li>Harrow is a low wage borough, with those that are employed in the borough earning less than the London average weekly earnings of £813.40<sup>14</sup>. Women also earn less than men in the borough. The average gross weekly earnings among women working in Harrow is £480.10, this is 28% lower than the London average of £666<sup>15</sup>.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>12</sup> Harrow Economic Assessment: 2019-2020: population

<sup>13</sup> NOMIS: Labour supply (at December 2020)

<sup>14</sup> Source: NOMIS: earnings by place of work: 2021

<sup>15</sup> Source: NOMIS: earnings by place of work: 2021

	<ul style="list-style-type: none"> <li>• 20% of Harrow businesses are female led.<sup>16</sup></li> <li>• While the pandemic may have negatively impacted both sexes, the shift to home working may have had a positive impact in enabling women to return to work, as they are able to share childcare responsibilities.</li> </ul> <p><b>Impact</b> The projects will aim to be inclusive of all residents regardless of their sex.</p>				
<p><b>Sexual Orientation</b></p>	<ul style="list-style-type: none"> <li>• The Office for National Statistics estimated in 2014, 2.6% of Londoners identify as lesbian, gay, or bisexual, the highest of any UK region<sup>17</sup>. There is no official data on sexual orientation for Harrow in relation to employment.</li> <li>• LGBTQIA+ people are also likely to be underrepresented among business owners within Harrow.</li> </ul> <p><b>Impact</b> The projects will aim to be inclusive of all residents regardless of their sexual orientation.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?</b></p> <p><input type="checkbox"/> Yes                      No    <input checked="" type="checkbox"/></p>					
<p>If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below</p>					
<p><b>2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc), could your proposals have an impact on individuals/service users, or other groups?</b></p>					

<sup>16</sup> Beauhurst: number of companies registered at Companies House that are female led (April 2021)

<sup>17</sup> Trust for London: London’s Poverty profile 2016.

Yes

No

If you clicked the Yes box, Include details in the space below

### 3. Actions to mitigate/remove negative impact

**Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.**

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for <b>each</b> group, identified in section 2. In addition, you should also consider and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact please state below.	Deadline date	Lead Officer

48

### 4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010

2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

**Include details in the space below**

1. The Procurement of Estate Improvements and Roofing renewals will not result in any direct or indirect discrimination of any group that shares the protected characteristics.  
The Procurement of Estate Improvements and Roofing renewals will improve the living standards of Harrow's housing stock and improve Health & Safety, ventilation and heat loss.

**5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies**

**Outcome 1**

**No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed**

**Outcome 2**

**Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4**

**Outcome 3**

**This EqIA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.**

Include details here

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**Report for: Cabinet**

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<b>Date of Meeting:</b>	27 July 2023
<b>Subject:</b>	Electric Vehicle Charging in Harrow: Update and Implementation
<b>Key Decision:</b>	Yes, affects multiple wards and over time will be significant in terms of its impact on our communities.
<b>Responsible Officer:</b>	Dipti Patel, Corporate Director for Place
<b>Portfolio Holder:</b>	Councillor Anjana Patel, Portfolio Holder for Environment and Community Safety  Councillor David Ashton, Portfolio Holder for Finance and Human Resources
<b>Exempt:</b>	No, except for appendices 1 - 4 which are exempt by virtue of Paragraph 3 of Schedule 12A of the Local Government Act 1972 because they contain information relating to the financial & business affairs of the council.
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All
<b>Enclosures:</b>	Appendix 1 – Draft Call off Contract (Exempt) Appendix 2 – Draft Specification (Exempt) Appendix 3 – Draft Invitation to Tender (Exempt) Appendix 4 – Draft Pricing Schedule (Exempt)

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

This report sets out an update on electric vehicle charging provision in Harrow, including rapid charging provision, and seeks authority from Cabinet to implement phases 2 and 3 of the Council's on-street residential charge point scheme by procuring lamp column charge points under the Oxford City Council Dynamic Purchasing System (DPS) for the Supply of Electric Vehicle Charging Infrastructure and Associated Services.

### **Recommendations:**

Cabinet is requested to:

1. Note the update on the expansion of electric vehicle charging provision in the borough and authorise officers to develop proposals for the installation of additional rapid chargers in Harrow, and to delegate authority to the Corporate Director for Place, following consultation with the Portfolio Holder for Environment and Community Safety, to award a contract for rapid charging installation in Harrow, following a compliant procurement process.
2. Approve the commencement of a procurement process for a concessionary contract for the provision of approximately 225 lamp column charge points for residents in Harrow by conducting a call for competition under the Oxford City Council Dynamic Purchasing System (DPS). The successful charge point operator will be responsible for installing, commissioning, and maintaining the charge points. The term of any future call-off contract following the call for competition under the DPS will be 10 years plus an additional 5-year extension option.
3. Approve the draft tender documents for lamp column charge points.
4. Delegate authority to the Corporate Director for Place, following consultation with the Portfolio Holder for Environment and Community Safety, to make any changes required to the tender documents for lamp column charge points, following approval.
5. Delegate authority to the Corporate Director for Place, following consultation with the Director of Finance and Assurance, the Portfolio Holder for Environment and Community Safety and the Portfolio Holder for Finance and Human Resources, to award the contract for lamp column charge points, following a compliant procurement process.

### **Reason:(for recommendations)**

To enable the expansion of electric vehicle charging infrastructure on public assets for the benefit of Harrow residents, whilst contributing to decarbonisation of transport in Harrow. Cabinet authorisation is required to comply with the Council's Contract Procedure Rules and Financial Regulations.



## **Section 2 – Report**

### **Introductory paragraph**

2.1 A key theme of the Council's Climate and Nature Strategy 2023-2030, which was approved by cabinet in April 2023 in draft for public consultation, is Green Mobility. The Green Mobility theme includes the overarching objective to support the decarbonisation of transport within the borough by enabling low-carbon sustainable travel. This involves in part a shift towards increased walking, cycling, public transport, and car-sharing. However, in addition, transitioning from fossil fuel vehicles to electric vehicles is also a key outcome that enables the journey to net zero. In addition to tackling a major part of Harrow's carbon emissions, the progressive electrification of vehicles in the borough will significantly reduce air and noise pollution in Harrow, lead to better health outcomes, improve biodiversity and result in a more pleasant place in which to live and work.

2.2 To help support these objectives, the Council's Corporate Plan also has a flagship action to double the number of electric vehicle charging points on Council assets.

### **Options considered**

2.3 The options are to approve the development of proposals for rapid charging provision in Harrow and implementation of the next phases of on-street electric vehicle residential charging points through the procurement of lamp column charge points, or to choose not to. It is recommended to proceed with implementation and procurement as failure to do so will result in significant grant funding being lost, will not advance the Council's decarbonisation aims and will fail to support residents in the transition to electric vehicles.

2.4 Given the timescales and availability of a suitable DPS framework, where EV providers have already been financially and technically vetted, and can be procured relatively quickly, there is no need for the Council to undertake a lengthy full open tendering process for this procurement.

### **Background**

2.5 Harrow plans are underway to increase Electric Vehicle (EV) charging infrastructure across the Borough as part of its Traffic Management Programme, Walking and Cycling Strategy and based on requests from residents living in residential streets with no off-street parking possibilities. A Transportation Strategy and Electric Vehicle Strategy are under development by the Harrow Transportation Team for presentation to Cabinet later this year, which will set targets to roll out EV charging infrastructure and how this can contribute to the Green Mobility and decarbonisation objectives in its overarching Climate & Nature Strategy.

2.6 In the meantime, following the announcement of £20 million grant funding by the Office for Low Emission Vehicles (OLEV), Harrow has now secured £520,840 in funding from the Office for Zero Emission Vehicles (OZEV) for Phases 2 & 3 of 'on street' residential charging locations, to deliver 225 charge points. This is in addition to the 24 residential charge points and 5 on-street chargers already installed and operational as part of Phase 1 On-street Residential Chargepoint Scheme successfully delivered in May 2021, and 1 rapid charge point commissioned in March 2023. Usage has been demonstrably strong with increased demand over successive quarters. Current charging session times are spread across various times of day and night, averaging 7hrs 53mins.

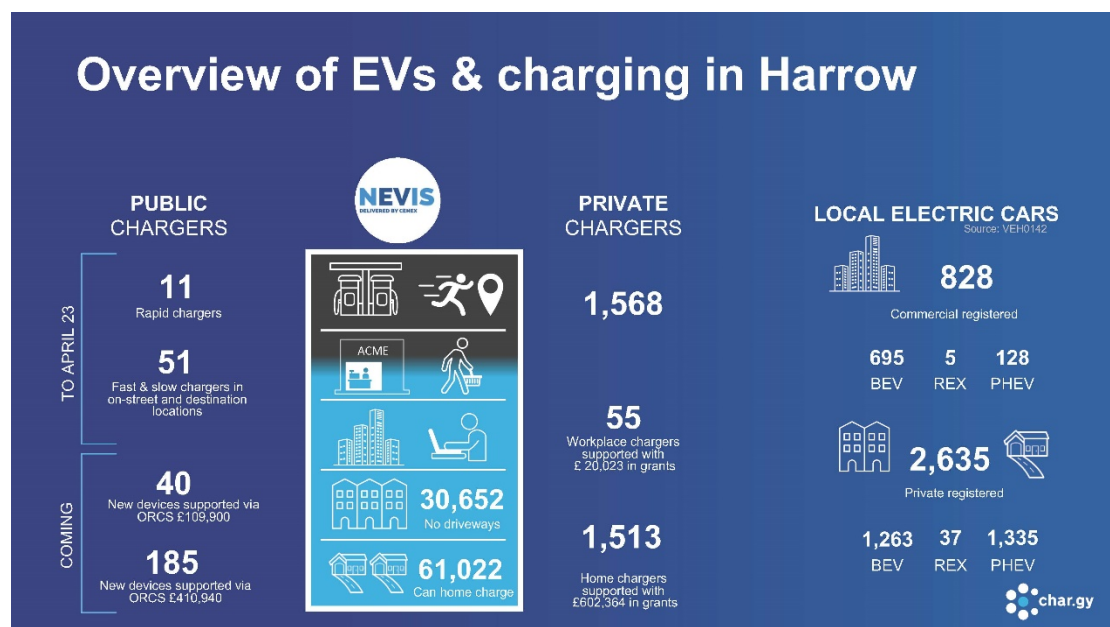
2.7 It is anticipated that by 2035 100% of new car and van sales will be electric to meet the government's net zero by 2050 target. The Climate Change Committee has recommended that if the UK is to meet the 2050 net zero target, 100% of new vehicle sales should be electrically propelled by 2035 at the latest (and ideally by 2030).

2.8 The focus of Harrow's electric vehicle programme is to expand EV charge point installations as demand from residents is high. Residents are encouraged to register requests for residential on-street EV charging via the Harrow Council website.

## Current situation

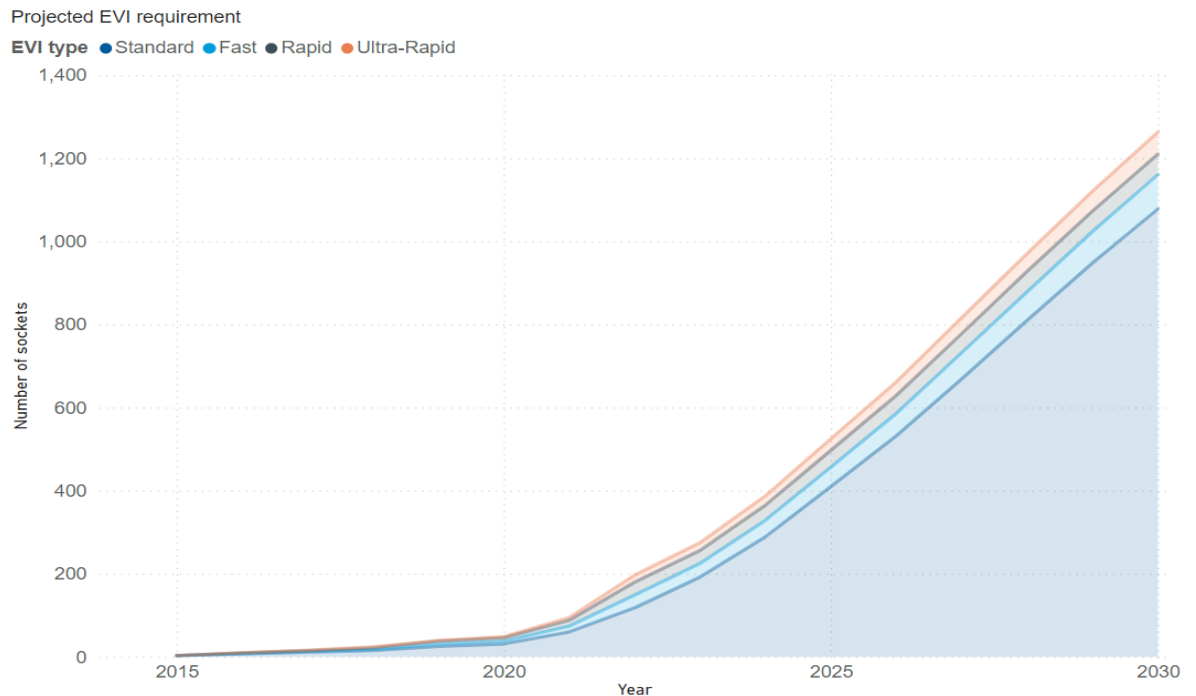
### Harrow overview

2.9 The current mix of charging provision in Harrow, both public and private, along with the number of local electric vehicles registered in the borough, is summarised on the following slide. The types of electric vehicle shown are BEV Battery Electric Vehicle (BEV); Battery Electric Vehicle + Range Extender (REX), and Plug-in Hybrid Electric Vehicle (PHEV).



## Projected EVI requirement for Cars and LGV's in Harrow

2.10 Initial data from Cenex for the borough indicates that a substantial and sustained programme of expansion of EV charging provision will be required to meet future demand through to 2030. This data and the mix and locations of demand, will be further explored and modelled through the Council's EV Strategy.



Insights Toolkit - © Cenex 2023

## 2.11 Data summary

'Years in dataset'[Year]	Number of sockets	EVI type
2030	1,078	Standard
2030	83	Fast
2030	53	Ultra-Rapid
2030	49	Rapid

## Council Progress

2.12 Since the start of Harrow's electric vehicle charge point programme in 2018, 30 charge points have been installed in residential and commercial areas. Five charge points were installed as part of the Neighbourhoods of the Future Greenhill Go Ultra Low City Scheme. 24 residential charge points were installed using On-Street Residential Charge Point (ORCS) funding. 1 rapid charge point was commissioned in March 2023.

The table below details the type of charge points that have been installed by Harrow:

No of Chargepoints	Charge Point Operator	Year of Installation	Charging type	Power Output
2	BP Pulse	2018	Slow	7kW
3	BP Pulse	2018	Fast	22kW
24	Char.gy	2021	Slow	5.1kW
1	BP Pulse	2023	Rapid	50kW

2.13 Slow chargers are 7Kw units mounted on or in streetlighting columns providing for a slow overnight charge. Fast chargers, typically around 22kw, are bollard sized units located on dedicated parking spaces, providing a charge to 80% in 3-4 hours. Rapid chargers over 50Kw, are a petrol pump sized unit providing charge to 80% in under an hour for most electric vehicles.

2.14 The Council has taken the opportunity to apply to various funds to provide support with EV installations. In 2018 the Go Ultra Low City Scheme (GULCS) provided funding for the first 5 on-street chargers as part of the Greenhill Go Ultra Low City Scheme. In 2019 the On-Street Residential Chargepoint Scheme (ORCS) provided funding for 24 Lamp Column charge and GULCS 1 rapid charge point.

2.15 A contract with Char.gy was secured via the Transport for London (TfL) GULCS framework. Frameworks save significant time and money, while delivering specific services that not only meet local requirements but support local decision making. The GULCS framework expired in July 2022, therefore the recommendation for this report is to secure a provider through a call for competition under the Oxford City Council DPS.

### **New Funding**

2.16 It is clear that the pace and scale of delivery of on street charging needs to increase in Harrow and in 2022 the Council therefore developed bids for additional funding. In March 2023, the Council was successful in being awarded an ORCS grant of £410,940 (tranche 3) to install up to 185 lamp column charge points. A previous ORCS grant of £109,900 (tranche 2) was awarded in September 2021 to install 40 lamp column charge points. Whilst resourcing issues resulted in delays in procuring a provider at that time, With OZEV's consent that funding has been carried over and will be utilised in the proposed procurement. The total amount of available funding for installations is therefore £520, 840. Charge Point Operators will be expected to agree to a minimum match funding at 25% (tranche 2) and 40% (tranche 3).

### **Rapid Charging Provision in Council Car Parks and other locations**

2.17 The installation of residential on street charging provision, which is suitable for longer stay and overnight charging, should also be supplemented by faster

charging options. The Council has commenced initial discussions with rapid charging providers with a view to better understanding the market and identifying suitable locations across our car park estate, and other on and off-street locations close to town centres and high footfall sites. The key findings from these initial discussions are:

1. To justify the higher capital levels of investment required in the equipment for rapid charging providers generally require lease terms of 15-30 years. Sites therefore require careful selection to ensure they are not likely to be subject to development within those timescales, and otherwise offer the shorter visitor dwell times appropriate for rapid charging.
2. Electricity capacity upgrades are almost always required for installation of rapid chargers, which can range in output from 50kw to 300kw, and sites need to be selected where this is economically viable to achieve. The timescales for installation of rapid charging provision are generally around 12 months allowing for capacity upgrade works, although this can be shorter for smaller installations.
3. Subject to securing the length of tenure required, costs of installation and capacity upgrades are borne by the provider, with an annual rental and / or profit share arrangement paid to the landowner.
4. The potential for expansion of rapid charging in the borough is good and providers are keen to work within Harrow.

2.18 Authority is requested to develop a procurement approach for an initial tranche of rapid charging expansion in council owned car parks and other council run locations.

### **Why a change is needed**

2.19 Many residents have made the decision to switch to EV or use an EV for work purposes. Lamp Column mounted charge points offer a solution for residents who do not have access to off street parking and want to purchase an EV. Lamp column charge points are often the better choice for residential areas due to their reliability and cost effectiveness. The existing 24 lamp column charge points currently operate on a Pay As You Go charge, currently at 69p/kWh day tariff and a reduced rate of 29p/kWh night tariff. Following the removal of a government subsidy on energy pricing, the daytime rate will reduce to 60p per kWh and the night-time charging rate will increase to 39p per kWh.

2.20 As the charge point market continues to expand, the availability of funding is gradually being reduced, with the expectation that installation and operational costs are met by Councils and the market. Harrow will continue to make the most of these funding schemes, however the council should be prepared to look for alternative ways to ensure the continuing viability in future years. The Council will set out its future programme, and the proposed method for rolling out charge points in its Electric Vehicle Strategy due for completion this year.

## Reasons for Recommendation

2.21 The rollout of further lamp column charge points plays a key role in the reduction of transport-based emissions and is integral to meeting net zero targets. Furthermore, it will support the council in meeting transport decarbonisation objectives set out in the Climate and Nature Strategy. Lamp column charge points provide an easy and cost-efficient solution to meeting the demands for residential charging.

2.22 Adhoc development of EV charging in Harrow to date means an accelerated and effective programme is required to work towards net zero. The programme will not only look to support residents who already own electric vehicles but also look to encourage the uptake of ownership in the borough.

2.23 Following on from the successful installation of 24 lamp columns charge points, it is necessary to expand a range of options for residents and visitors, to deliver additional fast chargers and rapid charge points. While lamp columns are currently the preferred type of infrastructure for charging in residential areas, and residential charging provision will remain the mainstay of future charging infrastructure locally and nationally, faster charging provision in other areas such as Town Centres, Council Car Parks and main routes are also crucial in expanding options in Harrow and enabling the progressive electrification of road transport in the borough.

## Implications of the Recommendation

2.24 Officers are therefore seeking, firstly, authority to develop proposals for an increase in rapid charging provision on Council assets, and to award a contract for rapid charging installation in Harrow, following a compliant procurement process and consultation with the Portfolio Holder for Environment and Community Safety and Director for Place. Secondly, authority is sought to undertake a procurement necessary to test the market and secure a charge point operator to install and maintain our next tranche of residential lamp column charge points. This will significantly increase the network of available options to residents and visitors in Harrow over the next year. The proposed procurement will secure a partner that can meet project deliverables and will enable the installation of up to 225 charge points by March 2024 for a total contract length of 10 years plus an additional 5-year extension option. By undertaking the procurement exercise, Harrow would not obligate itself to enter a contract until a full decision has been made in consultation with the Portfolio Holder for Environment, and Director for Place, in accordance with the Council's Contract procedure rules.

## Ward Councillors' comments

2.25 None as it impacts all wards

## Risk Management Implications

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

2.27 Separate risk register in place? **Yes**

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

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

<b>Risk Description</b>	<b>Mitigations</b>	<b>RAG Status</b>
If the proposed recommendation(s) are not agreed, the expansion of electric vehicle charging on public assets in the borough will not proceed, or be delayed, and wider progress on the LBH Climate and Nature Strategy slowed	<ul style="list-style-type: none"> <li>▪ Agreement to the report's proposed recommendation(s) will mitigate this risk</li> </ul>	<b>GREEN</b>
Delay in procurement resulting in loss of grant funding.	<ul style="list-style-type: none"> <li>▪ Undertaking a timely procurement in accordance with the council's Contract Procedure Rules.</li> </ul>	<b>GREEN</b>
Delay in procurement resulting in additional costs to the allocated budget such as inflation, supply chain bottlenecks and scarcity of suitable materials and/or labour.	<ul style="list-style-type: none"> <li>▪ Undertaking a timely procurement in accordance with the council's Contract Procedure Rules.</li> </ul>	<b>GREEN</b>
Council unable to procure a suitable Charge Point Operator and concession agreement.	Making use of the Oxford City Council DPS as pre-qualified providers complaint with ORCS and OZEV standards have been appointed to the DPS and the DPS contains a concession call-off contract template	<b>GREEN</b>

## **Procurement Implications**

2.30 This report seeks delegated authority to procure and award an Electric Vehicle Charging points concessionary contract by Public Contract Regulation compliant means of Call for Competition under Lot 1 of the EV Charging Infrastructure Dynamic Purchasing System DN519227 created by Oxford City Council ("the EVI DPS").

2.31 The EVI DPS comprises a group of EV charging equipment/infrastructure Suppliers and EVI service providers, some of which (under Lots 1 and 2) can deliver EVI requirements under a Concession Contract. The EVI DPS is available for use by all UK Public Sector Bodies.

2.32 Value of the contract is below Concession Contracts Regulations 2016 financial thresholds for concessions.

2.33 Use of the proposed procurement approach is compliant with the Councils Contract Procedure Rules.

2.34 Bidders will be required to provide technical and commercial submissions, with all Tenders being evaluated for both their technical and commercial suitability in relation to the Councils requirements.

2.35 The Invitation to Tender will set out the high-level evaluation criteria with a price weighting of 55% quality rating of 45%.

## **Legal Implications**

2.36 The Traffic Management Act 2004 places obligations on highway authorities to ensure the expeditious movement of traffic on their road network. Authorities are required to make arrangements as they consider appropriate for planning and carrying out the action to be taken in performing the duty.

2.37 Under section 16 of the London Local Authorities and Transport for London Act 2013 (LLATLA 2013), the Council has the power to provide and operate, or grant permission to a person to provide and operate, charging apparatus for electric vehicles.

2.38 The Council must comply with its Constitution and Contract Procedure Rules (CPRs). Procurements by means of a concession contract, greater or equal to the financial threshold (currently £5,336,937 incl VAT for works and service contracts) must also comply with the Concession Contracts Regulations 2016 (CCR). This procurement is below threshold and therefore not caught by the CCR.

2.39 The Council is proposing to procure a concession arrangement for the provision of the lamp column charge points and propose to procure the charge points under a Dynamic Purchasing System (DPS), set up by Oxford City Council. The Council intends to conduct a call for competition under lot 1 of the DPS: *End to end services Turnkey solutions*. This will involve submitting an invitation to tender setting out the Council's specific requirements and any accompanying documentation, and all suppliers on that lot are invited to submit a bid. Once the bids are evaluated and the call-off contract is awarded, the Council will need to inform Oxford City Council of the award by completing the confirmation of award document.

2.40 The Council's legal team (HBPL) is satisfied that the DPS is suitable for the provision of the proposed concession arrangement. HBPL is also satisfied that the Council can lawfully access the DPS as it is open to all UK public



sector bodies including local authorities and the Council has signed the relevant Access Agreement enabling the Council to use the DPS, providing that the Council complies with the rules of the DPS. The DPS currently expires on 30<sup>th</sup> August 2025 (subject to extension or re-procurement).

2.41 As the estimated value of the procurement meets or exceeds £500,000, approval to procure must be obtained by way of a Cabinet Report and a Cabinet decision must be obtained prior to any tender activity commencing, as required under the Council's CPRs (*Table 1 Authorisation and Acceptance Thresholds*). Under section 14 of the CPRs, the Portfolio Holder with responsibility for Finance and Human Resources must be consulted at the pre procurement planning stage and the Directorate Portfolio Holder must be consulted throughout the commissioning planning and procurement phase of the project. Under paragraph 14.1 of the CPRs, all Cabinet reports seeking approval to commence a procurement for the acquisition of Works, Goods or Services must be accompanied by the tender documents and a recommendation seeking approval of the tender documents and under paragraph 14.2, the development of the tender documents prior to seeking approval by Cabinet must be done in close engagement and consultation with the portfolio holder for the service and any other portfolio holder that is considered to have an interest in the outcome of the tendering exercise.

2.42 In line with paragraph 6.1 of the CPRs, all procurement over £100,000 requires the engagement of the Corporate Procurement Team and HB Public Law. HBPL will continue to support with this project.

## Financial Implications

2.43 The Council has successfully secured funding of £520,840 from Office for Zero Emission Vehicles (OZEV) as part of Tranches 2 and 3 funding rounds. The grant conditions require supplier(s) of the EV charging points to provide a match funding of 25% and 40% respectively. These are summarised in the table below.

<b>Scheme</b>	<b>Grant Funding</b>	<b>Match fund requirement by Supplier</b>	<b>Match fund by supplier</b>
OZEV 2	£109,900	25%	£36,633
OZEV 3	£410,940	40%	£273,960
	<b>£520,840</b>		<b>£310,593</b>

2.44 The majority of the grant funding is expected to be retained by the Council to fund civil works and signage. This is estimated at £479k in total. Therefore, the financial contribution to the installation of EV charging points is £41k and the rest of the installation costs will be borne by the successful bidder of the proposed procurement exercise in a form of match funding. The successful bidder will be responsible for installing and maintaining the EV charging points and charging customers for the use of the facility. There will be no on-going revenue costs to the Council.

2.45 The pricing schedule of the tender pack also asks bidders to propose a % income share with the Council. It is anticipated that there will be a modest income which will be used to contribute towards the saving target in relation to EV charging in the approved MTFs.

2.46 The proposal of rapid charging provision in Council car parks and other locations is subject to a further Cabinet report. Funding sources will need to be identified for this.

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

2.47 There are no physical changes to the highways as a result of these works which might affect accessibility.

2.48 There are no equalities implication to this decision.

### **Council Priorities**

2.49 The expansion of EV charging provision aims to deliver a lower carbon borough. It will help deliver the Council's overall vision of Restoring Pride in Harrow by realising the opportunities of new jobs and investment in Electric Vehicles and associated infrastructure, improved health and air quality and a more pleasant, thriving environment for local people.

2.50 The increase in public charging helps to put residents first by delivering much needed infrastructure to enable greater levels of green mobility in Harrow and contributes to a borough that is clean and safe. The focus on on street residential charging also aims to support those households who live in smaller homes with no off-street parking.

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

### **Statutory Officer: Dawn Calvert**

Signed by the Chief Financial Officer

**Date: 4<sup>th</sup> July 2023**

### **Statutory Officer: Patricia Davila**

Signed on behalf of the Monitoring Officer

**Date: 4<sup>th</sup> July 2023**

### **Chief Officer: Dipti Patel**

Signed off by the Corporate Director

**Date: 5<sup>th</sup> July 2023**

### **Head of Procurement: David Hayes**

Signed on behalf of the Head of Procurement

**Date: 4<sup>th</sup> July 2023**

**Head of Internal Audit: Neale Burns**

Signed on behalf of Head of Internal Audit

**Date: 3<sup>rd</sup> July 2023**

**Has the Portfolio Holder(s) been consulted? Yes**

## **Mandatory Checks**

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

**EqIA carried out: NO**

There are no equalities implication to this decision as covers all Wards and residents.

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

**Contact:**

Dalton Cenac / Interim Head of Traffic, Highways and Asset Management [dalton.cenac@harrow.gov.uk](mailto:dalton.cenac@harrow.gov.uk)

Matthew Adams / Assistant Director of Climate Change & Natural Reserves [matthew.adams@harrow.gov.uk](mailto:matthew.adams@harrow.gov.uk)

**Background Papers: None**

**Call-in waived by the Chair of Overview and Scrutiny Committee - NO**

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**Report for: Cabinet**

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<b>Date of Meeting:</b>	27 July 2023
<b>Subject:</b>	UKSPF Supply Ready and Skills and Employment
<b>Key Decision:</b>	Yes - covers more than one ward
<b>Responsible Officer:</b>	Dipti Patel - Corporate Director of Place; Mark Billington - Director of Inclusive Economy, Leisure and Culture
<b>Portfolio Holder:</b>	Cllr Norman Stevenson – Portfolio Holder for Business, Employment and Property; Cllr David Ashton - Portfolio Holder Finance and Human Resources
<b>Exempt:</b>	No
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All Wards
<b>Enclosures:</b>	Appendix 1 – EqIA UK Shared Prosperity Fund – Skills and Employment and Supply Ready West London

## Section 1 – Summary and Recommendations

1.1 This report sets out the financial and legal implications of the London Borough of Harrow entering into Grant Funding Agreements (GFA) with the London Borough of Ealing to:

- Receive the Council's funding allocations from the relevant Department of Levelling Up's UK Shared Prosperity Fund (UKSPF) released from the Greater London Authority (GLA) to the London Borough of Ealing, and
- Deliver the UK Shared Prosperity Fund (UKSPF) Supply Ready and People and Skills programmes.

### Recommendations:

1.2 Following consultation with the Portfolio Holders for Business, Employment and Property and Finance and Human Resources, Cabinet is requested to grant:

- 1) Authority to the Corporate Director of Place and the Director of Finance following consultation with the Portfolio Holder for Business, Employment and Property and Portfolio Holder for Finance and Human Resources to enter into a Grant Funding Agreement with London Borough of Ealing to secure £151,500 funding from the Department of Levelling Up's UK Shared Prosperity Fund (UKSPF) through the Greater London Authority (GLA) to deliver the Supply Ready Programme to support businesses secure public sector contracts.
- 2) Authority to the Corporate Director of Place and the Director of Finance following consultation with the Portfolio Holder for Business, Employment and Property and Portfolio Holder for Finance and Human Resources to enter into a Grant Funding Agreement with London Borough of Ealing to secure £474,115 funding from the Department of Levelling Up's UK Shared Prosperity Fund (UKSPF) People & Skills through the Greater London Authority (GLA) to prioritise and deliver programmes to improve Harrow skills and job brokerage, and to support residents and businesses.
- 3) Delegate authority to the Corporate Director of Place, following consultation with the Director of Finance, Portfolio Holder for Business, Employment & Property and Portfolio Holder for Finance and Human Resources, to approve the tender packs at a future date for the Supply Ready and People and Skills programmes.
- 4) Delegate authority to the Corporate Director of Place, following consultation with the Director of Finance, Portfolio Holder for Business, Employment & Property and Portfolio Holder for Finance and Human Resources, to award the contracts following a compliant procurement process for the Supply Ready and People and Skills programmes.

### **Reason: (for recommendations)**

1.3 The GLA issued an open call for funding application bids under the UKSPF Business Support programme. The London Boroughs of Harrow, Ealing and Hillingdon submitted a joint Supply Ready (West London) bid, which was successful. The London Borough of Ealing is the accountable body for the bid. Entering into a Grant Funding Agreement with the London Borough of Ealing will enable businesses based within the London Borough of Harrow to access support from the Supply Ready programme which will assist them to secure public sector contracts.

1.4 The GLA has allocated the People and Skills allocation of London's allocation of the UKSPF to Sub-regional partnerships. The accountable body for the West London Alliance is the London Borough of Ealing. Entering into a Grant Funding Agreement with the London Borough of Ealing will enable the London Borough of Harrow to secure a direct allocation of the People and Skills allocation.

## **Section 2 – Report**

### **2.0 Introduction**

- 2.1). The GLA has allocated a total of £474,115 funding to the London Borough of Harrow to deliver projects under the UKSPF themes People & Skills. In addition, the London Borough of Harrow has secured funding of £151,500 through a joint bid with Ealing and Hillingdon Councils to the GLA under an 'open call' bidding process for a UKSPF Supply Ready programme. Key priorities for Harrow were identified in The Harrow Economic Development Strategy 2022-26. The strategy was developed in consultation with Portfolio Holders, stakeholders and officers who identified skills and job brokerage priorities that can be addressed by initiatives funded by the UKSPF to support the growth and sustainability of local businesses.
- 2.2). These projects address the Council's Corporate Policies; -
- A Council that Puts Residents First.
  - A Place where those in Need are Supported.

### **3.0 Options considered:**

- 3.1). The following options were considered:
- 3.2). **Option A:** To enter into Grant Funding Agreements with the London Borough of Ealing for the Supply Ready and Skills and Employment Programme. The Supply Ready funding will enable the London Borough of Harrow to secure £151,500 and support businesses to secure public sector contracts. The Skills and Employment programme will enable the London Borough of Harrow to secure £474,115 to deliver projects to improve residents' skills and access to job brokerage, supporting local businesses.

- 3.3). **Option B:** To do nothing - Not to enter into Grant Funding Agreements with the London Borough of Ealing.  
This would mean that the London Borough of Harrow would not receive the £474,115 Skills and Employment funding nor the £151,500 Supply Ready funding from the UKSPF and priorities identified in the Economic Development strategy will not be progressed.
- 3.4). **Preferred Option**  
Option A - enables the London Borough of Harrow to receive the £474,115 Skills and Employment funding and the £151,500 Supply Ready funding from the UKSPF to deliver the projects identified and their objectives.

## 4.0 Background

- 4.1). The UK Shared Prosperity Fund (UKSPF) replaces European Union funding (specifically European Structural and Investment Fund) The Greater London Assembly (GLA) is responsible for the award, management, and administration of UKSPF in London. The UK government has established three UKSPF investment priorities:
- I. Communities and Place
  - II. Supporting Local Business
  - III. People and Skills
- 4.2). This paper concentrates on People & Skills and Supporting Local Business.
- 4.3). £38million has been allocated for People and Skills for London and is divided into workstreams.
- **Young People** have £9.5m of support financing help for Young People not in education, employment, or training (NEET) or those at risk of NEETS. Details to be confirmed.
  - An additional £3.5m will be allocated to **careers hubs**. These projects will be directly commissioned by GLA
  - **Adult programmes** have £25m allocated between boroughs based on unemployment statistics, and will be delivered via three initiatives:
    - 20% Work & Health Programme delivered by Shaw Trust in Harrow
    - 6% No Wrong Door (also known as West London Employment Skills hub), this will expand the web-based training and employment directory for use by professionals to find training and employment support for residents across the West London Boroughs.



- 70% for borough-based Job brokerage and training that will include ESOL, IT, maths, and English, as well as skills related vocational training. Target beneficiary groups are; -
    - Black, Asian, and other minority ethnicities
    - People over the age of 50
    - Women
    - People with disabilities
- 4.4). Under the Supporting Local Business Open Call strand, £3m was available across London to apply for a Supplier Readiness programme. A joint bid, by the London Boroughs of Harrow, Ealing, and Hillingdon, with Ealing as the lead authority, was submitted. The full amount requested of £500,869.92 was secured to deliver a Supply Ready (West London) programme to support businesses to secure public sector contracts. From the overall secured funding across the 3 boroughs, the London Borough of Harrow will receive £151,500.
- 4.5). To access the funding, the London Borough of Harrow is now required to sign Grant Funding Agreements (GFA) with the London Borough of Ealing. The outputs and outcomes information submitted as part of the GFA and will be used to monitor performance over the lifetime of the UKSPF programme.
- 4.6). The GFA have been drafted to reflect the standard clauses in the GLA’s UKSPF Memorandum of Understanding with the UK Government. The GLA has stated it cannot renegotiate the standard clauses or wording. The GLA is tied to the UK Government’s UKSPF requirements which includes a clause allowing GLA to reduce the amount of grant paid to Harrow if the Secretary of State withholds or reduces UK Shared Prosperity Funding under its Memorandum of Understanding with the GLA.
- 4.7). The Programmes seeks to deliver the Corporate Objectives of:
  - A Council that puts residents first
  - A place where those in need are supported
- 4.8). The Programmes also seek to deliver objectives within the Harrow Economic Strategy 2022-2026 and the following activities:

**Table 1 Activities to be Delivered**

<b>Programme</b>	<b>Related Harrow Economic Strategy 2022-2026 Objectives</b>	<b>What we will measure (Harrow Economic Strategy)</b>	<b>Indicator (Harrow Economic Strategy)</b>	<b>Other Measures of Success</b>	<b>Targeted Programme Outputs</b>
<b>UKSPF Supply Ready programme</b>	1). Encourage business growth 2). Strengthen the Local Authority’s	1). Local spend in the supply chain.	1). Percentage of 3rd party spend in	1). Deliver business programmes to ensure the Local	1). Number of businesses supported

	<p>sustainable procurement activities and develop local supply chains to stimulate growth in the green and circular economy.</p> <p>3). Promotion and delivery of meet the buyer events. Including potential provision of business-to-business mentoring from tier 1 and tier 2 providers to SMEs</p>		<p>local supply chain</p>	<p>Authority meets growth outcomes and outputs in accordance with grant requirements.</p> <p>2). Ensure criteria is adhered to, KPIs delivered. Provision of monitoring information for claim to GLA and budget management</p>	
<p><b>UKSPF Skills and Employment</b></p>	<p>1). Support stakeholders, small and medium sized enterprises and the voluntary sector to provide apprenticeships and training opportunities.</p> <p>2). Develop job brokerage with key growth sectors and micro-businesses to support residents to achieve their career aspirations.</p> <p>3). Secure external funding for skills and employment initiatives, that closely align with the needs of local employers and the local labour</p>	<p>1). Young people in employment, education, or training.</p> <p>2). Unemployment rate</p>	<p>1). Percentage of young people (aged 16-17) not in Education, Employment or Training (NEET)</p> <p>2). Percentage difference of Harrow and London's Claimant Count</p>	<p>1). Supported into employment through Xcite (The London Borough of Harrow's employment initiative), Learn Harrow (the Local Authority's Adult Community Learning Service) and the supply chain</p> <p>2). Provide Information and Advice to residents (through Xcite)</p>	<p>Number of people engaged to be supported in jobsearch.</p> <p>Number of economically inactive people engaged and key worker support.</p> <p>Number of people engaged in job search following support.</p> <p>Number of people in employment or self-employment following support.</p>

	<p>market. Aligning with the Local Skills Improvement Plan to secure investment into Harrow.</p> <p>4). Deliver courses in essential digital skills, English for speakers of other languages (ESOL), GCSE English and GCSE Maths.</p> <p>5). Address skills shortages by connecting local employers to post 16 training providers</p>				
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4.9). In developing these proposals, the London Borough of Harrow used the 2022 -2026 Economic Development Strategy research which consulted with representative groups and organisations and built on previous consultations. Consultees have included: North-West London Chamber of Commerce, West London Business, HA1BID. Traders Associations, Learn Harrow, local colleges, and Voluntary Sector Organisations

## 5.0 Implications of the Recommendation

### 5.1). Considerations

By entering into the Grant Funding Agreements (GFA) with the London Borough of Ealing, the London Borough of Harrow is bound by the terms of the agreement. This includes:

- The GLA’s monitoring requirements, including the need for the Local Authority to submit quarterly claim submissions
- The grant review and claims process
- A requirement to accord with branding guidelines issued by the Secretary of State, the UK government, or the GLA

5.2). Further details are given in the Resources/Costs, Legal Implications and Finance Implications in this report.

5.3). The GLA will review the delivery of Harrow’s projects annually and confirm whether the project activities and the Grant Funding Agreements should continue in line with existing plans.

#### 5.4). **Resources, Costs - Grant Claims & Payments**

The London Borough of Harrow must submit quarterly progress claims over the financial years 2023/24 and 2024/25 which are to be signed by the section 151 officer.

- 5.5). The Local Authority will be required to keep detailed records of all expenditure, including evidence of the expenditure and the defrayal, and provide this upon request by the London Borough of Ealing. The GLA may periodically request to see a detailed breakdown of expenditure and supporting evidence.

### 6.0 **Staffing/workforce**

- 6.1). Some of the UKSPF funding will be used to employ staff to deliver the project(s) in the relevant service area. These costs were included in the local Authority's submission to the GLA. This includes:
- 4 job brokers to give employment information, advice and guidance and deliver job brokerage with Harrow businesses

### 7.0 **Ward Councillors' comments**

- 7.1). Not applicable

### 8.0 **Performance Issues**

- 8.1). The Grant Funding Agreements will support the delivery of the Corporate Performance Indicators to provide to provide information advice and guidance to residents and support them into employment. It will also provide business growth support to businesses to be able to win public sector contracts.

### 9.0 **Risk Management Implications**

- 9.1). Risks included on corporate or directorate risk register? **No**
- 9.2). Separate risk register in place? **No** but separate risk registers will be developed for each project
- 9.3). The relevant risks contained in the register are attached/summarised below. **Yes**
- 9.4). The following key risks should be taken into account when agreeing the recommendations in this report:

<b>Risk Description</b>	<b>Mitigations</b>	<b>RAG Status</b>
<b>Risks related to entering into the UKSPF Grant Funding Agreements with Ealing Council.</b>		
If the recommendations in the report are not agreed, the Local Authority would not receive the	▪ Acceptance of the report's recommendations will fully mitigate this risk.	<b>Green</b>

Risk Description	Mitigations	RAG Status
funding from the UKSPF and would be unable to deliver the projects identified.		
The London Borough of Harrow does not fully comply with the terms and conditions of GLA funding from the UK Shared Prosperity Fund.	<ul style="list-style-type: none"> <li>▪ Project Officer overseas claims and internal financial management.</li> <li>▪ Processes and regime overseen by the finance directorate.</li> <li>▪ Compliance with GLA regulations.</li> </ul>	<b>Green</b>
The GLA does not meet the terms of its MOU with central government leading to a reduction or the cessation of funding from the GLA.	<ul style="list-style-type: none"> <li>▪ Projects reviewed and scaled down to meet financial resources available.</li> </ul>	<b>Green</b>
Delay in GLA finalising the Grant Funding Agreements (GFA) with Ealing Council.	<ul style="list-style-type: none"> <li>▪ Comments on the GFA agreed by the GLA before the final GFA is issued.</li> </ul>	<b>Green</b>
Delay in funding being paid could delay delivery of project(s).	<ul style="list-style-type: none"> <li>▪ . Supply Ready programme will commence delivery and incurring spend only after the relevant contacts are signed.</li> <li>▪ Most Skills and Employment projects are not planned to start spending until 2024/25.</li> </ul>	<b>Green</b>
Reduction in the Grant paid to the London Borough of Harrow because of the Secretary of State withholding or reducing UK Shared Prosperity Funding under its Memorandum of Understanding (MOU) with the GLA.	<ul style="list-style-type: none"> <li>▪ The London Borough of Harrow to ensure that it meets the requirements of its GFA with the GLA including, for example the need for the Local Authority to submit quarterly claim submissions.</li> <li>▪ In the case of any reductions in funding, projects will be scaled down accordingly as indicated above.</li> </ul>	<b>Green</b>
Staff leaving	<ul style="list-style-type: none"> <li>▪ Enter Recruitment process</li> </ul>	<b>Green</b>
<b>Risks Relating to Project Delivery</b>		

<b>Risk Description</b>	<b>Mitigations</b>	<b>RAG Status</b>
Under delivery of outcomes	<ul style="list-style-type: none"> <li>▪ Quarterly reporting and review to identify any projects not on track and revise delivery plan.</li> </ul>	<b>Green</b>
Delay in funding being paid at each milestone stage could delay delivery of project(s).	<ul style="list-style-type: none"> <li>▪ Mitigations above</li> </ul>	<b>Green</b>

## **10. Procurement Implications**

- 10.1). Each individual project will be procured in compliance with the London Borough of Harrow's Contract Procedure Rules and the Public Contracts Regulations 2015 in consultation with the Portfolio Holders for Business, Employment and Property, Environment and Finance and Human Resources.
- 10.2). This report seeks authority to enter in Grant Funding Agreements with the London Borough of Ealing and seeks authority to delegate authority for the Corporate Director of Place in consultation with the Director of Finance and the respective Portfolio Holder for Business, Employment & Property and Portfolio Holder Finance and Human Resources to approve the tender packs at a future date, and to enter into contracts following a compliant procurement process.

## **11. Legal Implications**

- 11.1). HB Public Law can advise on the terms of the Grant Funding Agreements between the London Borough of Ealing and the London Borough of Harrow as appropriate.
- 11.2). Each procurement undertaken must be in compliance with the London Borough of Harrow's Contract Procedure Rules and the Public Contracts Regulations 2015.

## **12. Financial Implications**

- 12.1). Total grant allocated under the themes of People & Skills is £474,115 revenue funding.
- 12.2). The total grant awarded to Ealing Council by the GLA for the Supply Ready (West London) programme is £500, 869.92, of which the London Borough of Harrow will receive £151,500 worth of funding.
- 12.3). Financial monitoring arrangements will be put in place to ensure that the spend is in accordance with the proposals approved by Ealing Council & the GLA and accurate financial information is used for each quarterly progress claim.

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

13.1). An Equalities Impact Assessment (EqIA) has been undertaken for the UK Shared Prosperity Fund – Skills and Employment and Supply Ready West London (see Appendix 1).

13.2). In summary, the EqIA findings are:

- I. The UKSPF will not result in any direct or indirect discrimination of any group that shares the protected characteristics.
- II. The UKSPF Skills and Employment and Supply Ready West London projects will help to advance the equality of opportunity for Black, Asian and Multi-ethnic people, women, people aged over 50 and people with disabilities by putting provision in place that targets these groups as there is a need for it.

### **14. Council Priorities**

14.1). The UKSPF Ready Supply (West London) and Skills and Employment programme addresses the following Council's Corporate Priorities:

- A Council that Puts Residents First – by supporting residents into employment.
- A Place where those in Need are Supported – by supporting businesses to win public sector contracts.

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

**Statutory Officer: Dawn Calvert**

Signed by the Chief Financial Officer

**Date: 22/06/23**

**Statutory Officer: Puja Shah**

Signed on behalf of the Monitoring Officer

**Date: 23/06/2023**

**Chief Officer: Dipti Patel**

Signed off by the Corporate Director

**Date: 03/07/2023**

**Head of Procurement: Nimesh Mehta**

Signed on by the Head of Procurement

**Date: 22/06/23**

**Head of Internal Audit: Neale Burns**

Signed on behalf of the Head of Internal Audit

**Date: 23/06/23**

**Has the Portfolio Holder(s) been consulted? Yes**

**Mandatory Checks**

**Ward Councillors notified:** No as it impacts on all Wards.

**EqlA carried out:** Yes

**EqlA cleared by:** Yasmeen Hussein, EDI Policy Officer

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

**Contacts:** Shehzad Ahmed, High Streets and Business Support Service Manager, [Shehzad.ahmed@harrow.gov.uk](mailto:Shehzad.ahmed@harrow.gov.uk)

Victoria Isaacs, Xcite Service Manager, [Victoria.Isaacs@harrow.gov.uk](mailto:Victoria.Isaacs@harrow.gov.uk)

**Call-in waived by the Chair of Overview and Scrutiny Committee - NO**





### You will need to produce an Equality Impact Assessment (EqIA) if:

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

Guidance notes on how to complete an EqIA and sign off process are available on the Hub under Equality and Diversity. You must read the [guidance notes](#) and ensure you have followed all stages of the EqIA approval process (outlined in appendix 1). Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: [Equality Impact Assessment](#) - sources of statistical information.

Equality Impact Assessment (EqIA)		
<b>Type of Decision:</b>	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
<b>Title of Proposal</b>	UK Shared Prosperity Fund – Skills and Employment and Supply Ready West London	<b>Date EqIA created 12/06/23</b>
<b>Name and job title of completing/lead Officer</b>	Mavis Kusitor, Economic Strategy Programme Manager	
<b>Directorate/ Service responsible</b>	Place Directorate, Inclusive Economy, Culture and Leisure	
Organisational approval		
<b>EqIA approved by :</b>  EDI Team - EDI Policy Officer.	<b>Name: Yasmeen Hussein, EDI Policy Officer</b>	<b>Signature</b> <input checked="" type="checkbox"/> <b>Tick this box to indicate that you have approved this EqIA</b>  <b>Date of approval: 21.06.23</b>

## 1. Summary of proposal, impact on groups with protected characteristics and mitigating actions

(to be completed **after** you have completed sections 2 - 5)

### a) What is your proposal?

The UK Shared Prosperity Fund (UKSPF) is a central pillar of the UK government's ambitious Levelling Up agenda and a significant component of its support for places across the UK. It provides £2.6 billion of new funding for local investment by March 2025.

It seizes the opportunities of leaving the European Union, by investing in domestic priorities and targeting funding where it is needed most: building pride in place, supporting high quality skills training, supporting pay, employment and productivity growth and increasing life chances

The London Borough of Harrow has been allocated funding to deliver projects under the UKSPF investment priorities of People and Skills and the Supporting Local Business Open Call. These projects are summarised in the below table:

Project Name	Project Summary	UKSPF Theme
Skills and Employment	<p>Employability and job search support for economically inactive residents through Harrow's Xcite job brokerage service. The project will have alignment to the Local Skills Improvement Plan. Support will also be given to residents to access job opportunities created by the Harrow Strategic Development Partnership (HSDP) and construction programmes. Key sectors include:</p> <ul style="list-style-type: none"> <li>- Construction</li> <li>- Business administration and support services</li> <li>- Professional scientific and technical services</li> <li>- Accommodation and food services</li> <li>- Information and communication services</li> <li>- Green and circular economy</li> </ul> <p>Clients will be referred to Learn Harrow for training in essential digital skills, English for speakers of other languages (ESOL), L2 English and L2 Maths. The value of the funding is £474,115.</p>	People and Skills

Supply Ready West London	<p>Business support to SMEs in Ealing, Harrow and Hillingdon enabling them to access public sector linked supply chains, understand buyer needs, meet gateway compliance and other requirements and secure bids. The project will help to identify and map public sector market opportunities for micro-SMEs in a range of sectors to quote/ tender for: scope of purchase, accreditations, compliance and other requirements and timescale.</p> <p>The focus of the support will be to make SMEs more visible to lead contractors and broker introductions. Develop relationships with diverse lead buyers, include them in Buyer events and SME advice workshops to maximise the number of SMEs prepared to and invited to quote.</p> <p>Delivery includes sector-focused advice to enable SMEs to submit high-quality bids to Council services, LAIN orgs and other public bodies and Tier 1 / 2 contractors etc. The value of the funding is £500,869.</p>	Supporting Local Business Open Call	
<p><b>b) Summarise the impact of your proposal on groups with protected characteristics</b></p> <p><b>Skills and Employment</b></p> <ol style="list-style-type: none"> <li>1. The Skills and Employment project will be open to everyone the meets the eligibility criteria of being either unemployed or economically inactive. For the UKSPF People and Skills investment priority all London boroughs were required to set equalities targets for the following groups: <ul style="list-style-type: none"> <li>- Black, Asian and Multi-ethnic people</li> <li>- Women</li> <li>- Disabled people</li> <li>- Over 50 years old</li> </ul> </li> <li>2. The rationale for building in targeted support is to help to advance the equality of opportunity by addressing the inequalities that these groups face with accessing well paid and sustainable employment.</li> <li>3. Harrow is one of the most culturally diverse local authorities in the UK, with over 60% of residents from Black, Asian, and Multi-Ethnic backgrounds<sup>1</sup>. These residents are more likely to experience barriers to employment due to lack of English language, functional and digital skills<sup>2</sup>.</li> </ol>			

<sup>1</sup> Census 2021

<sup>2</sup> ONS Article: Exploring the UK's digital divide March 2019

4. Harrow has a population of 261,300 consisting of 132,500 women (50.7%) and 128,800 men (49.3%)<sup>3</sup>, this is almost a 50/50 split. Harrow's economically active male population is 89.2%, compared with the female population at 75.4%.
5. Disabled people are also likely to be under-represented among the workforce there are also particular groups that have specific obstacles in progressing to the labour market or sustaining self-employment. These include adults with learning disabilities and those with severe mental health issues.
6. As part of the Government's drive to help those aged 50 and over re-join the jobs market there will be targeted support for this group to remove any barriers that are keeping older workers out of the jobs market. 65% (169k) of Harrow's population are of the working age of 16-64 of which 18% (47k) are aged 50-64<sup>4</sup>. In May 2023 there were 6,085 people claiming out of work benefits, 1,415 of these people are over the age of 50<sup>5</sup>.

### **Supply Ready West London**

1. The Supply Ready West London project will be open to everyone the meets the SME eligibility criteria. For the UKSPF Supporting Local Business investment priority all London boroughs were required to set equalities targets for the following groups:
  - Black, Asian and Multi-ethnic people
  - Women
  - Disabled people
2. The rationale for building in targeted support is to help to advance the equality of opportunity by addressing the inequalities that these groups face with business start-up, business survival and access to new contracts.
3. 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. Many of these residents operate micro businesses and have the potential to secure new sales and contract through local supply chains. The Council also has targets to increase the value of its local supply chain contracts by 2026.
4. Harrow's population is 261,300 (2021 census) consisting of 132,500 women (50.7%) and 128,800 men (49.3%), this is almost a 50/50 split. However, data gathered from the Beauhurst platform shows that female led businesses are underrepresented amongst new business start-ups in the borough with just 26% of business registrations reported between March and July'22.

<sup>3</sup> Census 2021

<sup>4</sup> Census 2021

<sup>5</sup> ONS Claimant count by sex and age

5. 6% of women in Harrow aged 16 to 64 years are self-employed, this is less than the London average of 8.5%. Whereas 13.5% of men in Harrow aged 16 to 64 years are self-employed, this is close to the London average of 14%<sup>6</sup>.
6. Disabled people are also likely to be under-represented among the workforce there are also particular groups that have specific obstacles in progressing to the labour market or sustaining self-employment. These include adults with learning disabilities and those with severe mental health issues. Disabled people are also likely to be under-represented among business owners within Harrow.

**b) Summarise any potential negative impact(s) identified and mitigating actions**

- People that are either White British, Men and/or are under 50 years old may be excluded from some of the messaging and outreach activities. There will be elements of support from both projects that will be available to everyone regardless of their ethnicity, gender and age– no one will be turned away without an offer of support or signposting to other services.
- There is limited data on Harrow’s large micro-business sector, in terms of ownership by protected characteristics. Therefore, it is recommended that work is undertaken to gather baseline data, to ensure that the borough can respond to the needs of local businesses. Equalities monitoring is part of the performance monitoring process for both projects.

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<sup>6</sup> Source: ONS employment data (June 2022)

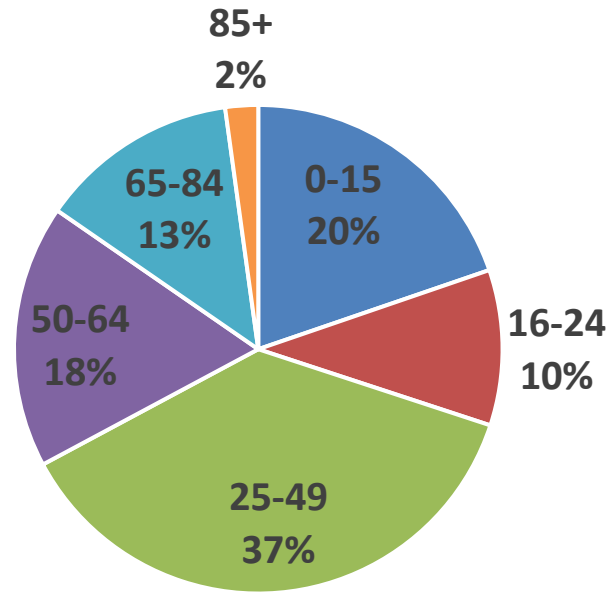
<b>2. Assessing impact</b>					
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to <a href="#">borough profile data</a> , <a href="#">equalities data</a> , service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on <b>each</b> group. Where there are gaps in data, you should state this in the boxes below and what action (if any), you will take to address this in the future.		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact			
<b>Protected characteristic</b>	For <b>each</b> protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	<b>Negative impact</b>		No impact
			Minor	Major	
<b>Age</b>	Harrow has a resident population of 261,300 <sup>7</sup> . Increasing by 9.3% in the ten years between 2011 and 2021 with an increase of 7.8% in people aged 15 to 64 years, it has an above average working age population aged 16-64 of just under 65% (169k) and a growing younger population aged 0-15 of 18.5% (48k), which is higher than the London average, suggesting that the borough is a popular destination for families <sup>8</sup> .	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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<sup>7</sup> Census 2021

<sup>8</sup> Census 2021

**Population by Age band %  
(Harrow 2021 Census)**



- As with most areas in the country, the borough has an ageing population. With the number of residents aged 65 plus increasing by 19.4% in the ten years between 2011 and 2021 with 31% rise in people aged 90 years and over<sup>9</sup>. Those aged 85 plus could increase by 60% by 2030<sup>10</sup>.
- Data available shows that the pandemic has adversely impacted young people aged 18-24, with 1 in 10 young people out of work<sup>11</sup>.

<sup>9</sup> Census 2021

<sup>10</sup> Poppi and Pansi projections to 2030

<sup>11</sup> DWP Job claimant data April 2021



	<ul style="list-style-type: none"> <li>Harrow has one of the lowest proportion of young people Not in Education, Employment and Training (NEETS). However, due to the Covid-19 pandemic, there has been a significant increase in numbers, from 0.8% to 1.8%<sup>12</sup>. (Now 1.2% August 2022<sup>13</sup>)</li> <li>65% (169k) of Harrow's population are of the working age of 16-64 of which 18% (47k) are aged 50-64<sup>14</sup>.</li> <li>In May 2023 there were 6,085 people claiming out of work benefits, 1,415 of these people are over the aged of 50<sup>15</sup>.</li> </ul> <p><b><u>Impact</u></b></p> <p><b>Skills and Employment</b></p> <ul style="list-style-type: none"> <li>The project will aim to support people over the age of 50 into employment. The target is that up to 65% of those supported will fall within the 50-64 age group.</li> </ul> <p><b>Supply Ready West London</b></p> <ul style="list-style-type: none"> <li>The project will aim to support all residents that run a business regardless of their age.</li> </ul>				
<b>Disability</b>	<ul style="list-style-type: none"> <li>The 2021 Census data shows that 9.75% of Harrow's population aged 15 to 64 years have a disability this equates to 16,840 people.</li> <li>There is a strong correlation between disability, in particular the extent of the disability, and economic inactivity.</li> <li>There are also particular groups that have specific obstacles in progressing to the labour market or sustaining self-employment. These include adults with learning disabilities and those with severe mental health issues.</li> <li>Disabled people are also likely to be under-represented among business owners within Harrow.</li> </ul> <p><b><u>Impact</u></b></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>12</sup> NEETS data at December 2020.

<sup>13</sup> NEETS data at December 2022.

<sup>14</sup> Census 2021

<sup>15</sup> ONS Claimant count by sex and age

	<p><b>Skills and Employment</b></p> <ul style="list-style-type: none"> <li>The project will aim to support people with a disability into employment. The target is that up to 6% of those supported will be classified as having a disability.</li> </ul> <p><b>Supply Ready West London</b></p> <ul style="list-style-type: none"> <li>The project will aim to support disabled residents that run a business.</li> <li>This project will be linked in with mainstream services such as the NHS Community Mental Health Team, Able Futures and Maximus.</li> <li>The target is that up to 10% of those supported will be classified as having a disability.</li> </ul>				
<p><b>Gender reassignment</b></p>	<p>The 2021 Census data shows the following:</p> <ul style="list-style-type: none"> <li>90.12% of Harrow residents described themselves as having the same gender identity as sex registered at birth (188,901 respondents)</li> <li>0.53% of Harrow residents described themselves as having a gender identity which differs to the sex registered at birth, but gave no specific identity (1,108 respondents)</li> <li>0.15% of Harrow residents described themselves as a Trans woman (318 respondents)</li> <li>0.16 of Harrow residents described themselves as a trans man (342 respondents)</li> <li>0.03% of Harrow residents described themselves as non-binary (57 respondents)</li> <li>0.03% of Harrow residents described themselves as 'All other gender identities' (59 respondents)</li> <li>8.98% of Harrow residents did not respond (18,832 respondents)</li> </ul> <p><b>Impact</b></p> <p><b>Skills and employment</b></p> <ul style="list-style-type: none"> <li>The project will aim to support women into employment. The target is that up to 60% of those supported will be women.</li> <li>Anyone that identifies themselves as a woman will be included in this targeted support. No one will be declined access to the services based on their gender identity.</li> </ul> <p><b>Supply Ready West London</b></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<ul style="list-style-type: none"> <li>The project will aim support at women in business.</li> <li>Anyone that identifies themselves as a woman will be included in this targeted support. No one will be declined access to the services based on their gender identity.</li> </ul>				
<b>Marriage and Civil Partnership</b>	<ul style="list-style-type: none"> <li>At the time of the 2021 Census 53.9% of Harrow's residents were married or in a registered civil partnership, which was the highest level in London.</li> <li>21% of households were married, or in same-sex civil partnerships, with dependent children, the highest level in London.</li> <li>At October 2020 there have been 144 Same Gender Civil Partnerships in Harrow, 25 of which has been converted to a Marriage. There have been 8 Opposite Gender Civil Partnerships. There have been 57 Same Sex marriages.</li> </ul> <p><b>Impact Skills and Employment</b> The project will aim to support residents regardless of their marriage and civil partnership status.</p> <p><b>Supply Ready West London</b> The project will aim to support residents regardless of their marriage and partnership status.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Pregnancy and Maternity</b>	<ul style="list-style-type: none"> <li>ONS births figures show Harrow as having 3,312 live births in 2021<sup>16</sup>. 14 live births per 1000 population is higher than the England &amp; Wales average of 10.8</li> <li>The borough has a higher-than-average infant mortality rate in London, at a rate of 3.9 deaths per 1000 live births, which is an indicator of poverty and inequality in the borough.<sup>17</sup></li> <li>Nationally, women have faced discrimination during pregnancy and maternity in the workplace. EHRC Survey data shows that around one in nine mothers (11%)</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>16</sup> Source: Office for National Statistics (ONS, 2022), Live births in England and Wales 2021

<sup>17</sup> Public Health England (2022), London's Poverty Profile 2022,

	<p>reported that they were either dismissed; made compulsorily redundant, where others in their workplace were not.</p> <p><b>Impact</b>  <b>Skills and Employment</b>          The project will aim to support residents regardless of their pregnancy and maternity status, including residents with childcare/caring responsibilities.</p> <p><b>Supply Ready West London</b>          The project will aim to support residents regardless of their pregnancy and maternity status, including residents with childcare/caring responsibilities.</p>				
<p>Race/ Ethnicity</p>	<p style="text-align: center;">% breakdown of non-WB populations, 2019</p> <p style="text-align: center;">% breakdown of change in non-WB populations</p> <p style="text-align: center;">Harrow (62.9% non-WB)</p> <ul style="list-style-type: none"> <li>■ Hindu Indian</li> <li>■ Sri Lankan</li> <li>■ Other South Asian</li> <li>■ Iranian</li> <li>■ Greek/ Greek Cypriot</li> <li>■ Other East European</li> <li>■ Polish</li> <li>■ Romanian</li> <li>■ Jewish</li> <li>■ Other Muslim</li> <li>■ Pakistani</li> <li>■ Black African/ Caribbean</li> <li>■ West European and Hispanic</li> <li>■ Other</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

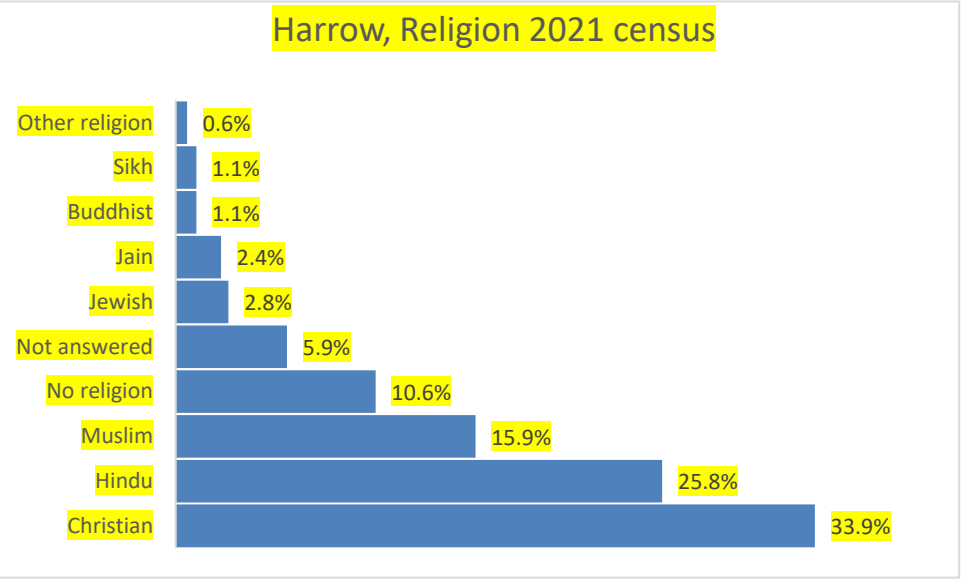
	<ul style="list-style-type: none"> <li>• Harrow is one of the most culturally diverse local authorities in the UK, with over 60% of residents from Black, Asian, and Multi-Ethnic backgrounds and an estimated 20% Eastern European community, which is fast growing<sup>18</sup>. Black African (notably the Somali Community) groups have been fast growing over the last 6 years or so, as has the Afghan community.</li> <li>• Unemployment rates are significantly higher in certain areas of the borough, particularly in the Wealdstone and Marlborough wards (central Harrow) and Roxbourne (south Harrow), focused in an around the Rayners Lane estate and among residents classified as Black and Other ethnic groups. These areas are also ranked high on the indices of deprivation for the UK.</li> <li>• The majority of 16–18-year-olds that are classed as NEET are from Black, Asian and Multi-ethnic backgrounds and located in wards with high levels of deprivation. However, the data also shows that the single largest ethnic group of pupils aged 16-18 classed as NEET is White British.</li> <li>• At ward level Marlborough, and Wealdstone have the highest number of households in need of re-housing. These respectively have a Black, Asian and Multi-ethnic population of 77% and 75%.</li> <li>• The highest rates of overcrowding is in Greenhill ward (97.5 per 1,000 households) and a Black, Asian and Multi-ethnic population of 74% (2011 census).</li> <li>• Black, Asian and Multi-ethnic residents are more likely to experience barriers to employment due to lack of English language, functional and digital skills.</li> <li>• Over 94% of Harrow businesses are classed as micro-businesses. There is limited data on the profile of business ownership by protected characteristics. Anecdotal evidence suggests that most retail businesses in Harrow’s town centres are Black, Asian and Multi-ethnic- owned.</li> </ul> <p><b><u>Impact</u></b> <b>Skills and Employment</b></p> <ul style="list-style-type: none"> <li>• The project will aim to support people from Black, Asian and Multi-ethnic backgrounds. The target is that up to 70% of those supported will fall within this group.</li> <li>• White British people may be excluded from the targeted support provided by both projects for Black, Asian and Multi-ethnic people. See section 3 for further details.</li> </ul>				
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<sup>18</sup> Harrow Economic assessment 2019-2020: population

	<p><b>Supply Ready West London</b></p> <ul style="list-style-type: none"> <li>The project will aim to support people from Black, Asian and Multi-ethnic backgrounds. The target is that up to 50% of those supported will fall within this group.</li> <li>White British people may be excluded from the targeted support provided by both projects for Black, Asian and Multi-ethnic people. See section 3 for further details.</li> </ul>				
<p><b>Religion or belief</b></p>	<ul style="list-style-type: none"> <li>Religious diversity is strong in Harrow. At the 2021 Census Harrow was the most religiously diverse borough in the country with the highest number Hindus (25%) and Jains (2.2%) and the second highest number of Zoroastrians.</li> <li>At the 2021 census Harrow had the highest number (and proportion) of Hindu followers in the country (25.8%). At 2.8% Harrow's Jewish community was the ninth largest nationally. 33.9% of residents described themselves as Christians (the 11th lowest proportion in the country) and 15.9% described themselves as Muslims. Harrow had the lowest ranking for 'no religion' (10.9%).</li> <li>As the population's ethnic composition changes, rates of participation in various religions are also likely to change<sup>19</sup>.</li> <li>There is limited data on employment/unemployment rates for Harrow by religion.</li> <li>Data for London suggests that educational attainment and employment among the capital's Muslim community is lower than those from other faith groups located in the borough<sup>20</sup>.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>19</sup> Harrow Economic Assessment: 2019-2020: population

<sup>20</sup> Annual Population Survey 2018.

	<p style="text-align: center;"><b>Harrow, Religion 2021 census</b></p>  <p><b>Impact</b> <b>Skills and Employment</b> The project will aim to support residents regardless of their religion or beliefs.</p> <p><b>Supply Ready West London</b> The project will aim to support residents regardless of their religion or beliefs.</p>				
<p><b>Sex</b></p>	<ul style="list-style-type: none"> <li>The 2021 census show that the total population of Harrow is now 261,300, made up of 132,500 women (50.7%) and 128,800 men (49.3%). Overall, the number of males and females living in Harrow is very similar.</li> <li>Economic activity among Harrow's male population is higher than the London average at 89.2%, compared with 83.8%.</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<ul style="list-style-type: none"> <li>• Economic activity among females in the borough is also higher than the London average at 75.4%, compared with 74.9%<sup>21</sup>.</li> <li>• Harrow is a low wage borough, with all those that are employed in the borough earning gross weekly earnings of £514.20, which is 37% less than the London average of £815.90. Women in the borough have gross weekly earnings of £485.90 and men in the borough earn £615.00. The London average earnings for women is £669.20 and for men it is £935<sup>22</sup>.</li> <li>• 26% of Harrow businesses are female led.<sup>23</sup></li> <li>• While the pandemic may have negatively impacted both sexes, the shift to home working may have had a positive impact in enabling women to return to work, as they are able to share childcare responsibilities.</li> </ul> <p><b><u>Impact</u></b> <b>Employment and Skills</b></p> <ul style="list-style-type: none"> <li>• The project will aim to support women into employment. The target is that up to 60% of those supported will be women.</li> </ul> <p><b>Supply Ready West London</b></p> <ul style="list-style-type: none"> <li>• The project will aim to support women in business. The target is that up to 20% of those supported will be women.</li> </ul>				
<p><b>Sexual Orientation</b></p>	<p>The 2021 Census shows that 4.27 % of Londoners identify as LGBTQIA+, the highest of any UK region<sup>24</sup>. 1.65% of Harrow residents identify as LGBTQIA+, this is approx. 4k people<sup>25</sup>.</p> <p>LGBTQIA+ people are also likely to be underrepresented among business owners within Harrow. There is no official data on sexual orientation for Harrow in relation to employment.</p> <p><b><u>Impact</u></b> <b>Skills and Employment</b></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>21</sup> Source: ONS annual population survey (September 2022)

<sup>22</sup> Source: ONS earnings by place of work: 2021

<sup>23</sup> Beauhurst: number of companies registered at Companies House that are female led (April 2021)

<sup>24</sup> Source: 2021 Census

<sup>25</sup> Source: 2021 Census



	<p>The projects will aim to support residents regardless of their sexual orientation.</p>				
	<p><b>Supply Ready West London</b>                  The projects will aim to support residents regardless of their sexual orientation.</p>				

**2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?**

Yes                      No   

If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below

**2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc), could your proposals have an impact on individuals/service users, or other groups?**

Yes                      No   

If you clicked the Yes box, Include details in the space below

The uncertainty of the cost-of-living may impact:

- resident’s ability to engage in skills and employment support.
- the growth and survival of businesses.

**3. Actions to mitigate/remove negative impact**

**Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.**

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for <b>each</b> group, identified in section 2. In addition, you should also consider, and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact, please state below.	Deadline date	Lead Officer
<p><b>Race/ Ethnicity:</b></p> <p><b>White British people may be excluded from the targeted support provided by both projects for Black, Asian and Multi-ethnic people.</b></p>	<p>The equalities target for Black, Asian and Multi-ethnic people is part of the funding requirements that have been set by the UK government for the UKSPF programme.</p> <p>It is lawful under the Equality Act to treat people differently in some circumstances, for example taking positive action or putting in place provision where there is a need for it.</p> <p>There will not be any additional mitigating measures put in place as the negative impact will be minor.</p>	<p>The projects will ensure that there is provision in place to provide information, advice and guidance to anyone that registers an interest. There will also be signposting to other services if required.</p> <p>Xcite offers the X3 Programme which is a year-round Council initiative that supports Harrow residents who do not meet the criteria for funded employment projects.</p>	March 2025	Mavis Kusitor
<p><b>Sex:</b></p> <p><b>Men, non-binary, gender neutral and other groups may be excluded</b></p>	<p>The equalities target for Women is part of the funding requirements that have been set by the UK government for the UKSPF programme.</p>	<p>The projects will ensure that there is provision in place to provide information, advice and guidance to anyone that registers an interest. There</p>	March 2025	Mavis Kusitor

<p><b>from the support provided by both projects to Women.</b></p>	<p>It is lawful under the Equality Act to treat people differently in some circumstances, for example taking positive action or putting in place provision where there is a need for it.</p> <p>There will not be any additional mitigating measures put in place as the negative impact will be minor.</p>	<p>will also be signposting to other services if required.</p> <p>Xcite offers the X3 Programme which is a year-round Council initiative that supports Harrow residents who do not meet the criteria for funded employment projects.</p>		
<p><b>Age: Under 50s may be excluded from the targeted support through the Skills and Employment project.</b></p>	<p>The equalities target for over 50s is part of the funding requirements that have been set by the UK government for the UKSPF programme.</p> <p>It is lawful under the Equality Act to treat people differently in some circumstances, for example taking positive action or putting in place provision where there is a need for it.</p> <p>There will not be any additional mitigating measures put in place as the negative impact will be minor.</p>	<p>Xcite will ensure that there is provision in place to provide information, advice and guidance to anyone that registers an interest. There will also be signposting to other services if required.</p> <p>Xcite also offers the X3 Programme which is a year-round Council initiative that supports Harrow residents that do not meet the criteria for funded employment projects.</p>	<p>March 2025</p>	<p>Mavis Kusitor</p>

<p><b>Cost-of-living may affect resident's ability to engage in skills and employment support.</b></p> <p><b>a) Pregnancy / Maternity:</b> Single parents are among those most exposed to the cost-of-living crisis, particularly those aged 25 and under, who get a reduced rate of universal credit. Given this, it may be harder for these individuals to engage in employability support.</p> <p>However, the Economic Strategy states that the Council has pledged to reduce Council Tax bills for less well-off families and roll out full fibre broadband to Council housing.</p> <p><b>b) Sex</b> Harrow's economically active male population is 89.2%, compared with the female population at 75.4%.</p> <p>Harrow is a low wage borough, women in the borough have gross weekly earnings of £485.90 and men in the borough earn £615.00. The London average earnings for women is £669.20 and for men it is £935.10.</p>	<p>The cost of living continues to affect households across the UK, the government has announced a new package of payments to help most households claiming benefits. Residents can contact the Council for guidance on the help that is available to them.</p> <p>Learn Harrow is the Council's Adult Community Learning Service and focal to its provision is to achieve the Council's priority to support those most in need, in doing so the Community Learning programme will include targeted support for the following groups:</p> <ul style="list-style-type: none"> <li>• Unemployed adults and residents at risk of redundancy</li> <li>• Adults in low-paid employment (earning less than London Living Wage)</li> <li>• Older learners, particularly those in an isolated or vulnerable situation</li> <li>• Families, particularly where parents have basic English or Maths needs or who have not reached Level 2, where</li> </ul>	<p>The cost of living is a national crisis. We will assess the trend using data provided by the UK government and other data agencies.</p>	<p>March 2025</p>	<p>Mavis Kusitor</p>
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<p><b>c) Race / Ethnicity:</b> Black, Asian and Multi-ethnic residents are more likely to experience barriers to employment due to lack of English language, functional and digital skills.</p> <p><b>d) Disability:</b> Disabled individuals who have lower income than their non-disabled counterparts will be disproportionately impacted by the cost-of-living crisis.</p>	<p>there is a single parent or families with complex needs</p> <ul style="list-style-type: none"> <li>• Disabled learners including those with mild to moderate mental health issues, learning difficulties or physical and sensory impairments.</li> </ul> <p>Xcite is Harrow Council's employment and training service. Its mission is to provide employment support and promote job opportunities to Harrow residents. They also support funding of vocational courses, supporting residents and businesses with apprenticeships and work experience placements.</p> <p>Therefore, the Council moves to mitigate the negative impact the cost-of-living will have by making access skills development and employability support accessible to people most in need.</p>			
<p><b>Cost-of-living may harm the growth and survival rates of businesses.</b></p> <p><b>a) Sex:</b> 6% of women in Harrow aged 16 to 64 years are self-employed, this is less than the London average of 8.5%.</p>	<p>Although we cannot directly influence a business' decision to cease trading or to relocate outside of the borough, the Council works in close partnership with stakeholders and support agencies including Harrow Town Centre BID (HA1 BID), Federation of Small</p>	<p>The cost of living is a national crisis. We will assess the trend using data provided by the UK government and other data agencies.</p>	<p>March 2025</p>	<p>Mavis Kusitor</p>

<p>Whereas 13.5% of men in Harrow aged 16 to 64 years are self-employed, this is close to the London average of 14%.</p> <p><b>b) Race / Ethnicity:</b> 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.</p> <p>Many residents operate micro businesses that are disproportionately impacted by the cost-of-living crisis as they lack the benefit of consumer protection schemes such as the energy price cap.</p> <p>Due to the cost of living, many businesses are finding it harder to stay open, especially those based on the high street which rely on passing trade.</p> <p><b>c) Disability:</b> There is a strong correlation between disability, in particular the extent of the</p>	<p>Businesses, North-west London Chamber of Commerce, London Business Hub and London &amp; Partners Wayfinder to track business activity. There is a Business Forum that meets every four months to discuss key matters pertaining to businesses, members include some of those named above. The Economic Development team provide business engagement support and can signpost struggling businesses to available resources.</p> <p>Harrow's UK Shared Prosperity Fund Supporting Local Business programmes consists of:</p> <ul style="list-style-type: none"> <li>• Business Support and Engagement</li> <li>• Reuse Laptops and Mobile Phones Start Up Kit.</li> </ul> <p>Each of these projects provide targeted support for existing female, Black, Asian and Multi-ethnic and disabled business owners and residents that are interested in starting a business.</p>			
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<p>disability and economic inactivity. There are also particular groups that have specific obstacles in progressing to the labour market or sustaining self-employment. These include adults with learning disabilities and those with severe mental health issues. Disabled people are also likely to be under-represented among business owners within Harrow.</p>				
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#### 4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

#### **Include details in the space below**

1. The UKSPF will not result in any direct or indirect discrimination of any group that shares the protected characteristics.
2. The UKSPF Skills and Employment and Supply Ready West London projects will help to advance the equality of opportunity for Black, Asian and Multi-ethnic people, women, people aged over 50 and people with disabilities by putting provision in place that targets these groups as there is a need for it.

**5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies** **Outcome 1**

**No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed**

 **Outcome 2**

**Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4**

 **Outcome 3**

**This EqIA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.**

Include details here





## **Report for: Cabinet**

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<b>Date of Meeting:</b>	27 <sup>th</sup> July 2023
<b>Subject:</b>	Tall Buildings ('Building Heights') Supplementary Planning Document (SPD)
<b>Key Decision:</b>	Yes – affects more than two wards
<b>Responsible Officer:</b>	Dipti Patel, Corporate Director Place; Viv Evans, Chief Planning Officer
<b>Portfolio Holder:</b>	Cllr Marilyn Ashton - Deputy Leader of the Council and Portfolio Holder for Planning and Regeneration
<b>Exempt:</b>	No
<b>Decision subject to Call-in:</b>	No
<b>Wards affected:</b>	All Wards
<b>Enclosures:</b>	Appendix 1 – Consultation Statement: Schedule of Representations and Responses summary and officer response  Appendix 2 – Tall Buildings ('Building Heights') SPD  Recommendation from the Planning Policy Advisory Panel (13 July 2023)

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

This report documents the outcomes of consultation on the Tall Buildings ('Building Heights') Supplementary Planning Document ("SPD"). The report specifically sets out the public consultation undertaken, the consultation responses received and comments on these, and the proposed changes to the SPD following consultation. It recommends that Cabinet adopt the revised Tall Buildings ('Building Heights') SPD.

The purpose of the SPD is to provide guidance for new development with the suburban areas of Harrow, to ensure that the prevailing pattern of

development is respected, and that proposals do not harm this through excessive height and poor design.

### **Recommendations:**

Cabinet is requested to:

- 1) Adopt the Tall Building ('Building Heights') SPD attached at Appendix 2, which responds to the consultation responses received.
- 2) Note the contents of this report, and the consultation feedback with responses (Appendix 1)
- 3) Note the amended SPD which is considered to address the consultation responses where appropriate (Appendix 2)
- 4) Delegate authority to the Chief Planning Officer, in consultation with the Portfolio Holder for Planning & Regeneration, to make any minor amendments (including formatting and/or grammatical matters) to finalise the SPD.
- 5) Delegate authority to the Chief Planning Officer, in consultation with the Portfolio Holder for Planning and Regeneration, to undertake any necessary statutory process required for the formal adoption of the document.

### **Reason: (for recommendations)**

To amend the SPD to reflect the consultation responses where appropriate and adopt the SPD so that it is afforded weight as a material consideration in the determination of relevant planning applications.

## **Section 2 – Report**

### **1.0 Introduction**

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

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<sup>1</sup> See Cabinet meeting 24 May 2022, item 5  
<https://modern.gov.harrow.gov.uk/documents/s176909/Cabinet%20Report%20-%20May%202022%20-%20Tall%20Buildings%20and%20Conversions%20-%20FINAL%20V2%20-%2020220517.pdf>

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

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

- 2.1 In preparing the draft SPD, officers engaged informally with key external and internal stakeholders, to ensure that any key points would be able to be addressed at an early stage. Based on the informal consultation, the SPD was drafted and enabled formal consultation to be undertaken.

## **3.0 Formal Consultation**

- 3.1 In undertaking formal consultation on the draft SPD, this followed the statutory process for the preparation and adoption of SPDs, including consultation in accordance with the Harrow Statement of Community Involvement (SCI). All consultation material was reviewed by the Harrow Communication Team. The following consultation approach was set out in the report to Cabinet<sup>2</sup> on 16<sup>th</sup>

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<sup>2</sup> See Cabinet meeting 16 February 2023, Item 9  
<https://moderngov.harrow.gov.uk/documents/g65431/Public%20reports%20pack%20Thursday%2016-Feb-2023%2018.30%20Cabinet.pdf?T=10>

February 2023, when authority to consult in accordance with the below consultation methods was approved.

- a. SPD published on Harrow online engagement portal, including a consultation questionnaire.
- b. Harrow Council website – Local Plan page
- c. Harrow Press notice
- d. Harrow Council social media
- e. Email to be sent to MyHarrow accounts
- f. Emails / letters sent to consultees on the Local Plan database, who have indicated they are interested in Planning Policy consultations;
- g. Two online engagement sessions (held on Zoom)

3.2 Following the authority to consult from Cabinet, the following information was provided on the Council's new online engagement platform (EngagementHQ);

- Draft SPD
- Background evidence (Characterisation & Tall Buildings Study (2021))
- Key dates for consultation period opening and closing
- Public events held (x2) – including dates / times and joining details
- Frequently asked questions page (nine questions)
- Online survey with level of agreement / disagreement polls and free / open text option.
- Questions tab to ask the planning policy team a question directly.
- Alternative methods of contacting the planning policy team (email/post)

3.3 A copy of the draft SPD was also available on the Harrow Council website, with alternative options to provide comment.

3.4 The consultation period was open for seven weeks and commenced on Monday 27<sup>th</sup> February 2023 and ran until midnight Monday 17<sup>th</sup> April 2023. The consultation period was extended to seven weeks (from the usual six weeks) to account for the Easter Holiday period. The outcomes of the consultation, and any resulting amendments to the SPD, are set out below and within the full consultation feedback as Appendix 1 (including online event summary) and the amended SPD attached as Appendix 2. In accordance with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council must publish a consultation statement explaining how any issues raised in representations have been addressed in the SPD. This is attached as Appendix 1.

3.5 The EngagementHQ platform was promoted as being the primary point of contact for engaging with the Council in relation to the SPD, associated information and providing any feedback on the draft SPD. Over the consultation period the following data was able to be collected in terms of traffic on the website;

- Total Visits to the site; 1.9K

- Engaged Visitors: 151
- Informed Visitors 786

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

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

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

##### **Statutory Consultee Responses**

Greater London Authority / Mayor of London

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

4.8 *Officer Response: The SPD seeks to provide guidance to ensure that suburban Harrow is protected from inappropriately tall buildings (among other material considerations), and to ensure high quality of design.*

4.9 The title of the SPD provides a clear indication that the guidance within it relates to tall buildings. The content within the SPD however is very clear that the guidance for what would be a contextually high building in a suburban location, is not in conflict with definition of a tall building as set out in Policy D9 (Tall buildings) of the London Plan (2021). Chapter 1 of the SPD makes it clear where and when the SPD should be engaged, and that the London Plan (2021) as the spatial strategy still provides the definition of a tall building. Chapters 1 and 2 are clear that a context-based analysis for proposals in suburban Harrow is undertaken, with Chapter 3 providing design guidance for contextually high buildings and also tall buildings (as per the London Plan (2021) definition).

#### Transport for London (Spatial Planning)

4.10 TfL (Spatial Planning) have provided a response to the draft SPD to reflect TfL's statutory duties as the strategic transport authority. The response received from TfL (Spatial Planning) amount to a number of minor amendments suggested to more accurately reflect relevant policy and guidance. Such amendments were limited to Design Principles C1 (Sustainable Locations), D5 (Transport and Parking), and D10 (Air, Noise and Microclimate).

4.11 *Officer Response: It is considered that the proposed amendments are minor, and would assist in better reflecting the relevant policy and guidance which the SPD seeks to be in general conformity. Including the amendments where appropriate would continue to ensure that the guidance set out in the SPD would remain robust.*

#### Transport for London (Infrastructure Protection)

4.12 TfL (Infrastructure Protection) is noted as responding to confirm no formal comments in relation to the draft SPD. However, to confirm that developments adjacent to TfL infrastructure will require consultation with TfL to be undertaken.

4.13 *Officer Response: This response is noted and consultation would be carried out as this is already undertaken. No amendments to the draft SPD are required.*

#### Environment Agency

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

design guidance principles have been made where appropriate and ensure the guidance meets the intent and purpose of the SPD.

#### Historic England

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

#### Natural England

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

#### General Responses

- 4.19 As set out in section 3 above, a total of 178 responses were received in response to the consultation. The substantive comments received, officer responses, and proposed amendments to the draft SPD are set out in Appendix 1. However, the following provides a summary of responses received and officers responses.
- 4.20 *Officer Response: Across the consultation responses, multiple suggestions of definitions of what a tall building should be were provided. Definitions ranged from anything higher than the existing height, up to a maximum height of 12 storeys.*
- 4.21 *A SPD is unable legally to set a height or location for tall buildings, as that would fall outside the legal remit of a SPD. Rather, this would have to be set through a Local Plan policy as part of the Local Plan review and would ensure general conformity with the London Plan (2021). The SPD is seeking to provide guidance to buildings that are less than the tall building definition as set out in policy D9A (Tall buildings) of the London Plan (2021).*



- 4.22 The SPD is overreaching its remit and does not accord with the London Plan (2021) by introducing a definition less than that set out in Policy D9 (Tall buildings) of the London Plan (2021). It will reduce affordable housing delivery.
- 4.23 *Officer Response: The SPD is clear that the guidance does not set a definition for a tall building. The SPD is clear that Policy D9 (Tall buildings) of the London Plan (2021) sets out a tall building definition and provides policy on how boroughs, through development plans must address tall buildings. The SPD provides guidance on how to contextually determine what would be a high building within a certain location within suburban Harrow, which would be less than what is defined as a tall building in the London Plan (2021). The SPD does not provide a presumption against high buildings, rather it seek to ensure height is progressed appropriately and any proposals are of a high quality design. The delivery of housing, especially affordable housing, will continue to a key pressure to deliver. However, the delivery of housing should not be at the expense of high-quality design.*
- 4.24 *It is noted that the GLA in their response (summarised above) has not objected to the SPD in relation to conformity with the London Plan (2021) and is supportive of the guidance (subject to their suggested amendments).*
- 4.25 *The Harrow local plan review is currently being progressed and this will address tall buildings and will seek to be in general accordance with D9 (Tall buildings) of the London Plan (2021).*
- 4.26 The proposal needs more consultation
- 4.27 *Officer Response: The SPD has been consulted in accordance with the Harrow Statement of Community Involvement, with the consultation undertaken agreed by Harrow Cabinet. Furthermore, the statutory timeframe was extended to seven weeks to allow for the Easter Holiday period. All relevant consultation material has been available online and in hard copy (Greenhill Library) and advertised through numerous channels as set out above under section 3. Online public consultation events were held to allow further information to be sought and questions to be asked of officers in relation to the proposed SPD. Any development proposals will be subject to consultation as part of the planning application stage. Officers are satisfied that the consultation undertaken is appropriate.*
- 4.28 The draft SPD Is not definitive enough
- 4.29 *Officer Response: A SPD is a guidance document to adopted policies within the Local Plan, and is unable to be as definitive as a policy within the Local Plan. The draft SPD must allow sufficient flexibility to allow applicants to achieve an appropriate development without stifling creativity. The draft SPD provides guidance to assist in developments achieving appropriate height and a high quality of design.*
- 4.30 Need to clarify both floors and meters when referring to a building height.

- 4.31 Officer Response: *It is agreed that providing both floors and meters would provide greater clarity where appropriate and this is reflected in the revised SPD.*
- 4.32 Existing developments are not of a high quality.
- 4.33 Officer Response: *The draft SPD is unable to influence existing developments that have already been implemented, however would be able to assist in improving the design quality of future developments.*
- 4.34 A number of precedents were considered to not be representative of good quality development examples.
- 4.35 Officer Response: *Precedents were provided where they were able to visually demonstrate a successful element of design that is seeking to be achieved through the design principles. The precedents have been reviewed and updated examples provided where appropriate from across London which are considered to be of high-quality design.*
- 4.36 Clarification of overly prominent definition
- 4.37 Officer Response: *It is noted that the term overly prominent is a relatively subjective term. However, what would be overly prominent can only be determined following the context-based analysis (following the process set out in the SPD) and will be defined on a case by case basis.*
- 4.38 There should be a clear presumption against any development above the current height in the area. Also, the policy should operate only by reference to current heights as of 2023 (i.e. any future development of taller buildings shouldn't "move the goal posts" and make it easier to develop more tall buildings.)
- 4.39 Officer Response: *The Harrow Characterisation & Tall Building Study (2021) sets out that at twice the prevailing height there is the potential for harm to the character of the area. Furthermore, the London Plan (2021) sets out that in development plans, boroughs must recognise that local character evolves over time. Whilst the SPD does not form part of the development plan, it must be drafted in a manner that will comply with policy set out in the new local plan (which will have to demonstrate general conformity with the London Plan). Whilst character will evolve over the time, the SPD seeks to ensure that this will occur appropriately.*
- 4.40 The Harrow & Wealdstone Opportunity Area is not included within the remit of the SPD as there are residents within this who would wish to be protected from tall buildings.
- 4.41 Officer Response: *The SPD does not include the Harrow & Wealdstone Opportunity Area (as set by the London Plan (2021)), as this is an area that is where growth is directed and is subject to more significant change. Conversely, the suburban areas of Harrow as an outer London borough, are much more susceptible to the impacts of development. For this reason, the SPD seeks to*

*ensure development in the suburban context of Harrow respects that character of that area.*

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

#### **Ward Councillors' comments**

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

4.50 The SPD has been presented on four occasions to the Planning Policy Advisory Panel (PPAP), during the scoping, drafting and both pre and post formal consultation. Matters raised during this forum have been addressed throughout the drafting of the document. The final presentation to PPAP was on the 13<sup>th</sup> July 2023, where the panel concluded to commend the SPD to Cabinet for its consideration to adopt. The minutes of the PPAP meeting of 13<sup>th</sup> July 2023 are available as a background paper.

## **5.0 Proposed amendments**

5.1 In light of the representations received and the Council's response to them (summarised in section 3 above and detailed in Appendix 1), a number of amendments have been made to the draft SPD (comprehensive list attached as Appendix 2). The majority of the amendments have been minor and have sought to provide more clarity or consistency with other legislation and / or guidance. The following amendments are considered those more notable;

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

5.2 Prior to final publication, the SPD will be subject to desktop publishing to improve its legibility. It should be noted that some additional, or minor, modifications to the SPD have also been made. These are minor changes that have been made to provide clarity, improve grammar, spelling corrections and factual changes where needed (for example, the document no longer being in draft form).

5.3 It is considered that the amendments made to the draft SPD result in a more robust document, respond to the consultation responses where appropriate, and would continue to assist in ensuring new development within suburban Harrow would respect the character of the that area. It would continue to deliver against the priority of the Council in putting residents first.

## **6.0 Options Considered**

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

### Conclusion

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

## **7.0 Implications of the Recommendations**

### *Considerations*

## **8.0 Resourcing**

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

## **9.0 Ward Councillors' comments**

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

## **10.0 Performance Issues**

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

## **11.0 Environmental Implications**

11.1 Sustainability appraisals for supplementary planning documents are only required in exceptional circumstances, but the Council must still consider whether there is a requirement for strategic environmental assessment (SEA). The Harrow Core Strategy (2012) and the policies contained within it were subject to a Sustainability Appraisal. The proposed SPD does not (cannot) introduce new policy but simply supplements / guides new development within the borough in relation to development policies located within the current London Plan and Harrow Local Plan, and any relevant new policy within the revised Local Plan.

11.2 The Council undertook a SEA as part of the consultation package for the draft SPD. It concluded that the SPD would not require a SEA. The three statutory bodies were consulted. Historic England, Environment Agency and Natural England, each confirmed they agreed or had no comment on the content of the SEA. The Council therefore confirm that a SEA is not required in the preparation of the SPD.

## **12.0 Data Protection Implications**

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

## **13.0 Procurement Implications**

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

## **14.0 Risk Management Implications**

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

Separate risk register in place? **No**

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

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

<b>Risk Description</b>	<b>Mitigations</b>	<b>RAG Status</b>
Non-compliance with regulatory requirements for the preparation of any guidance (i.e. scope of guidance, process.)	<ul style="list-style-type: none"> <li>▪ Scope of guidance has had regard to previous Counsel advice regarding this.</li> <li>▪ Process (including formal consultation) has been managed to ensure it complies with regulatory requirements.</li> </ul>	<b>Green</b>
Non-(general) conformity / consistency with Harrow development plan (i.e. London Plan, Harrow Local Plan)	<ul style="list-style-type: none"> <li>▪ Drafting has been undertaken in context of existing development plan.</li> <li>▪ Drafting of the SPD has been undertaken with development of relevant policy as part of Local Plan review to be considered in an effort to reduce any potential conflict with future Local Plan policy.</li> <li>▪ Informal consultation has been undertaken with the Greater London Authority (GLA) to ensure compliance with the London Plan (2021) and the document amended in response to formal representations from the GLA.</li> </ul>	<b>Green</b>
Residents and Members not satisfied with the document and proposed amendments to address consultation responses.	<ul style="list-style-type: none"> <li>▪ Consultation feedback addressed and amendments made to SPD to address appropriate comments received.</li> <li>▪ It may however not be possible to fully address all concerns raised in relation to the draft document given the broader policy context and range of competing views</li> </ul>	<b>Green</b>
The change to the title of the document as suggested by the Mayor of London (Greater London Authority) has not been made. The Mayor of	<ul style="list-style-type: none"> <li>▪ The Council has made it clear that this is for use in Harrow within a local context and is content to retain the title using the word 'Tall'.</li> </ul>	<b>Amber</b>

Risk Description	Mitigations	RAG Status
London may request the Secretary of State to call in the document. The SPD may be found unsound, or directions imposed to amend it, leading to a change in the published title.	The GLA could refer this to the Secretary of State and this might entail the Council reviewing the SPD title	

## 15.0 Legal Implications

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

## 16.0 Financial Implications

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

## 17.0 Equalities implications / Public Sector Equality Duty

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



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

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

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

17.3 The SPD aims, among others, for an inclusive and safe development for all and therefore advances equality of opportunity for all and is not considered to adversely impact on persons within the protected characteristic.

17.4 In addition, the proposed SPD the subject of this report will provide guidance and supplement adopted policies within the Harrow Core Strategy and Development Management Policies in the Local Plan. A full equalities impact assessment was carried out at each formal stage in the preparation of the Core Strategy and Development Management Policies Local Plan.

## **18.0 Council Priorities**

### **18.1 Putting residents first.**

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

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

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

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

The Tall Buildings ('Building Heights') SPD provides guidance on ensuring that new developments optimise sites and deliver against the requirements of the development plan. This would ensure that developments are able to

provide for infrastructure such as wheelchair accessible units and affordable housing.

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

**Statutory Officer: Jessie Man**

Signed on behalf of the Chief Financial Officer

**Date: 16/07/2023**

**Statutory Officer: Jimmy Walsh**

Signed on behalf of the Monitoring Officer

**Date: 17/07/2023**

**Corporate Director: Dipti Patel**

Signed by Corporate Director

**Date: 17/07/2023**

**Chief Officer: Viv Evans**

Signed off by the Chief Planning Officer

**Date: 17/07/2023**

**Head of Procurement: Nimesh Mehta**

Signed on behalf of the Head of Procurement

**Date: 15/07/2023**

**Head of Internal Audit: Neale Burns**

Signed on behalf of the Interim the Head of Internal Audit

**Date: 16/07/2023**

**Has the Portfolio Holder(s) been consulted? Yes**

### **Mandatory Checks**

Ward Councillors notified: No, as it impacts on all Wards. Cabinet consideration will be a Key Decision.

EqIA carried out: No: refer to paragraph 17 above

EqIA cleared by: N/A

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

**Contact:** Callum Sayers, Principal Planning Policy Officer, 077 3159 1724, [callum.sayers@harrow.gov.uk](mailto:callum.sayers@harrow.gov.uk)

### **Background Papers:**

- [National Planning Policy Framework \(2021\)](#)
- [London Plan \(2021\)](#)
- [Harrow Local Plan](#)
- [Agenda for Planning Policy Advisory Panel on Thursday 13 July 2023, 6.30pm – London Borough of Harrow](#)

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

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

1.1 This consultation statement has been prepared in accordance with Regulation 12 (a) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.2 The purpose of a consultation statement is to;

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

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

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

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

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

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

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

2.1 Tall Building ('Building Heights') SPD

**3. Purpose of the Document**

3.1 The Supplementary Planning Document (SPD) sets out detailed guidance for planning applications proposing buildings which are tall or contextually high within suburban locations within the London Borough of Harrow. In doing so, it provides further guidance to policies within the Harrow Local Plan for proposals for that are tall, or taller than the prevailing pattern of development in suburbia.

3.2 The SPD only applies to areas outside of the Harrow & Wealdstone Opportunity Area. It builds on the Harrow Characterisation and Tall Building Study, which was completed in August 2021 by Allies & Morrison Urban Practitioners.

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

#### **4. Stakeholders consulted during preparation of the SPD**

4.1 In drafting the SPD, the Council consulted all relevant specialist service providers within the Council and a number of external consultees (Development Management (x2), Highways Authority, Waste Authority, Drainage Authority, Environmental Health, Landscape / Biodiversity). Further to this, the Council also consulted with external stakeholders, including the Greater London Authority / Mayor of London, Metropolitan Police (Secure by Design), and the Harrow Design Review Panel.

4.2 Throughout the drafting of the draft SPD, officers reported to the Planning Policy Advisory Panel, a cross-party panel that provides feedback on planning policy matters. This includes providing feedback on matters such as SPDs.

#### **5. How were stakeholders formally consulted?**

5.1 Formal consultation was undertaken as set out in the Harrow Council Statement of Community Involvement, and as set out and agreed by Cabinet on the 16<sup>th</sup> February 2023. The formal consultation consisted of the following;

- a. *Website* – EngagementHQ is a dedicated consultation page that provided information on the draft SPD and hosted the consultation documents, including, Draft SPD, background documents, online survey and alternatives means of making representations.
- b. *Hard copies* – were made available for inspection at the Greenhill Library, Perceval Square, College Road, Harrow, HA1 1GX.
- c. *Email and letter notifications* to stakeholders and contacts on the Harrow Local Plan consultation database (including statutory consultees).
- d. *Social media presence and messaging* - Promoting the draft SPD consultation on social media assisted is a rapid digital outreach to a wide range of local people, including those in younger demographics. Harrow Council's communications team used social media resources.
- e. *Online drop-in sessions* - events allow the presentation of key consultation material to an audience, combined with direct questions and feedback. Two online sessions were held on Zoom, with details how to attend on mail out information and on the consultation website. A summary is attached as Appendix 2.
- f. *Survey* – sought respondent views on the draft SPD which was included on the EngagementHQ website.

5.2 The consultation period ran from Monday 27 February 2023 through to midnight Monday 17 April 2023.

5.3 All formal consultation documentation is set out in Appendix 1

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

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

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

### **Statutory Consultee Responses**

#### **Greater London Authority / Mayor of London**

6.2 All Local Development Documents in London must be in general conformity with the London Plan under section 24(1)(b) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004). Whilst a SPD is not a Development Plan Document (DPD), it's a Local Development Document as, as such, the Mayor of London may give an opinion to its general conformity with the London Plan. The Mayor is supportive of further design guidance such as the draft SPD in terms of its intent. However, three elements of concern with the draft SPD have been raised as conflicting with the London Plan (2021). GLA officers have delegated authority from the Mayor of London to provide comment in relation the draft SPD.

6.3 *Officer Response: The GLA raised concern that the draft SPD does not, when referring to a London Plan (2021) tall building, fully reflect the definition set out within Policy D9 (Tall buildings) of that plan. This could lead to ambiguity or confusion for users as to what the overall height of a tall building could be. Officers agree that the definition for a tall building as set out in Policy D9A (Tall buildings) of the London Plan (2021) should be set out verbatim to avoid any confusion. Any reference across the SPD to the London Plan definition follows this definition.*

6.4 GLA officers are concerned with the term 'contextually tall', which is considered to create an alternative and competing local tall building definition below the minimum definition set out within the London Plan (2021). GLA officers are of the opinion that the competing local definition for a tall building therefore results in the draft SPD being in direct conflict with Policy D9 of the London Plan (2021). Any local definition of a tall building should not be less than that as defined within the London Plan (2021), and a definition should be set out within a Local Plan document that has been through an Examination in Public (where a SPD is not subject to such a process).

6.5 *Officer Response: The GLA's concerns are noted, although these are arguably semantic. Consideration has been given to an alternative term that is able to be used to replace 'contextually tall' buildings, when referring to such proposals that are equal to or twice the height of the surrounding context, but less than that of the London Plan (2021) definition of a 'tall' building. It is considered that 'contextually high' is an appropriate alternative term which ensures that any consideration of a scheme still requires a contextual analysis, specifically in relation to the impacts of height. The use of this term resolves the concern raised by the GLA in relation to*

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

6.6 GLA officers consider that the existing name of the document 'Tall Buildings ('Building Heights') SPD could result in a misleading and confusing message about the purpose and function of the document.

6.7 *Officer Response: The SPD seeks to provide guidance to ensure that suburban Harrow is protected from inappropriately tall buildings (among other material considerations), and to ensure high quality of design.*

6.8 *The title of the SPD provides a clear indication that the guidance within it relates to tall buildings. The content within the SPD however is very clear that the guidance for what would be a contextually high building in a suburban location, is not in conflict with definition of a tall building as set out in Policy D9 (Tall buildings) of the London Plan (2021). Chapter 1 of the SPD makes it clear where and when the SPD should be engaged, and that the London Plan (2021) as the spatial strategy still provides the definition of a tall building. Chapters 1 and 2 are clear that a context based analysis for proposals in suburban Harrow is undertaken, with Chapter 3 providing design guidance for contextually high buildings and also tall buildings (as per the London Plan (2021) definition*

#### Transport for London (Spatial Planning)

6.9 TfL (Spatial Planning) have provided a response to the draft SPD to reflect TfL's statutory duties as the strategic transport authority. The response received from TfL (Spatial Planning) amount to a number of minor amendments suggested to more accurately reflect relevant policy and guidance. Such amendments were limited to Design Principles C1 (Sustainable Locations), D5 (Transport and Parking), and D10 (Air, Noise and Microclimate).

6.10 *Officer Response:* It is considered that the proposed amendments are minor, and would assist in better reflecting the relevant policy and guidance which the SPD seeks to be in general conformity. Including the amendments where appropriate would continue to ensure that the guidance set out in the SPD would remain robust.

#### Transport for London (Infrastructure Protection)

6.11 TfL (Infrastructure Protection) is noted as responding to confirm no formal comments in relation to the draft SPD. However, to confirm that developments adjacent to TfL infrastructure will require consultation with TfL to be undertaken.

6.12 *Officer Response: This response is noted and consultation would be carried out as this is already undertaken. No amendments to the draft SPD are required.*

#### Environment Agency

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



made where appropriate and ensure the guidance meets the intent and purpose of the SPD.

#### Historic England

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

#### Natural England

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

#### General Responses

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

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

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

*provided where appropriate from across London which are considered to be of high-quality design.*

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

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

6.45 *Furthermore, the Council has an ongoing dialogue with infrastructure providers such as the NHS to understand their needs, and look to secure floor space for them within new developments where they have identified a need.*

6.46 *The SPD is not proposing a presumption in favour of new development, rather setting out guidance to assist in new developments being appropriate in height and of a high-quality design. Such proposals have been and are coming forward already, and without such detailed guidance. Funding infrastructure through the CIL is considered the appropriate mechanism for infrastructure improvements.*

## **7. Proposed Changes to the SPD**

7.1 Following the consultation period as outlined above, officers reviewed all the responses. Where appropriate, amendments to the SPD have been made. The following provides a summary of the changes that have been made to the SPD.

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

**June 2023, Version 2.**

# Appendix 1 – Copies of consultation documents

## Appendix 1A (Copy of letter)

Name and address

Date: 27 February 2023

Dear Consultee

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

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

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

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

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

### **Consultation Details**

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

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

Greenhill Library  
Perceval Square  
College Road  
Harrow

HA1 1GX

Please contact us if you wish to discuss document access.

### **Consultation Responses / Representations**

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

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

- By email to: [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk)
- By post to: Planning Policy Team, Harrow Council, PO Box 1358, Harrow, HA3 3QN

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

### **Consultation Events**

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

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

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

For further information please contact the Harrow Planning Policy Team by emailing [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk) or calling 077 3159 1724 or 0208 736 6082.

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

Yours sincerely,

David Hughes  
Planning Policy Manager  
Email: [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk)

## Appendix 1B (Copy of email)

Dear Consultee

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

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

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

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

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

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

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

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Perceval Square  
College Road  
Harrow  
HA1 1GX

Please contact us if you wish to discuss document access.

## Consultation Responses / Representations

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

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

- By email to: [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk)
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Any representations must be submitted before midnight **Monday 17<sup>th</sup> April 2023**.

## Consultation Events

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

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

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

For further information please contact the Harrow Planning Policy Team by emailing [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk) or calling 077 3159 1724 or 0208 736 6082.

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

Yours faithfully

David Hughes  
Planning Policy Manager  
Harrow Council



## Appendix 1C (Copy of public notice)

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

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

**Title of the Document:**

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

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

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

**Period of Consultation**

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

**Making Representations**

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

Email: [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk)

Post to: Planning Policy Team, Harrow Council, PO Box 1358, Harrow, HA3 3QN

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

**Inspecting the Documents**

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

Greenhill Library  
Perceval Square  
College Road

Harrow  
HA1 1GX

## Appendix 1D (Online Consultation Event Feedback)

**Harrow Council**



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

## Summary of proceedings

Report by Public Perspectives

### Logistics

**Date/Time:**

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

**Location:** Via Zoom.

### Objectives and Approach

**Objectives:**

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

**Audience:**

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

**Promotion:**

- Via councils' communication and consultation processes, including social media and on-line consultation.

- Direct communication with key stakeholders on planning and consultation databases.

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

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

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

### Key themes, questions and comments

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

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

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

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

### **Wednesday 8<sup>th</sup> March 2023**

- **Participant:** Interested in council policy but suspect things are too late for the Kodak site?
- **Participant:** Can you please confirm that this presentation will be published so that people who can't attend this evening can see them, and include the link in the Council's next weekly email?
- **London Borough of Harrow:** The Kodak site is in the Harrow and Wealdstone Opportunity Area and would not be covered by the SPD. Additionally, you are correct, planning permissions are already in place for the Kodak site.
- **London Borough of Harrow:** Yes, we can add the presentation to the website for viewing by those who could not make it tonight or the second session on Tuesday 21/03/23 at 6:00pm. We can discuss with our Communications colleagues about a further article in the weekly email newsletter, linking to the consultation website / presentation.
- **Participant:** Several of the images and photographs in the current draft contradict text elsewhere in the document. Trinity Court in Marsh Road, Pinner is one of them. Para 3.3.5 acknowledges 6 storeys do not respect the character of Harrow's suburban areas and certainly not the character of Pinner.
- **Participant:** It reads ‘In almost all instances, proposals that meet the definition of a tall building within Policy D9 of the London Plan (2021) (6 storeys or 18 metres measured from ground to the floor level of the uppermost storey), will not respect the character of Harrow’s suburban areas. Such proposals will not be supported.
- **Participant:** What is the force in 3,3,5 of "will not be supported"? will that stop all development of 6 storeys or more?
- **London Borough of Harrow:** As a material consideration the SPD (including 3.3.5) will assist in the Council in resisting such developments but as an SPD it cannot be said to definitely stop all such developments (as it cannot set policy, just supplement existing policies). The Local Plan review / new Tall Buildings Policy will ultimately be the strongest mechanism in that regard.

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

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

## **Poll results**

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

## **Appendix 1E – (Consultation Response Spreadsheet)**

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1 Resident 1	Harrow should adopt a definition of tall buildings. I think that should be > 5 stories.	A tall building definition is unable (legally cannot) adopt a tall building definition. This will be considered as part of the Local Plan Review.	No amendment considered necessary
	12 stories should be the maximum for new tall buildings in Harrow	A building maximum height is unable (legally cannot) to be imposed on developments. Each application must be considered on its own merit.	No amendment considered necessary
	Harrow should allow tall buildings in strictly designated areas only.	A tall building designated area is unable (legally cannot) adopt a tall building definition. This will be considered as part of the Local Plan Review.	No amendment considered necessary
	Economic opportunity areas and in close proximity to anywhere where a tall building already exists is where they should be allowed. These close proximity areas should be strictly defined and not allowed to further expand after they are further developed. Within the proximity areas permitted tall buildings should not exceed the height of a pre existing building or 12 stories whichever is lower.	A tall building designated area is unable (legally cannot) adopt a tall building definition. This will be considered as part of the Local Plan Review.	No amendment considered necessary
	No building should ever be taller than the 5 stories outside of these areas. Any building exceeding 5 stories must give back to Harrow through funding new infrastructure within the Borough.	Officers consider that the approach within the SPD allows for flexibility and heights to be relative to the context and character of an area. All development that result in new floorspace (with some exceptions) must pay Community Infrastructure Levy, which is a development tax used for funding local infrastructure.	No amendment considered necessary
	The borough should encourage house building as well as flats. Use mixed developments to encourage.	The SPD seeks to provide guidance for contextually tall, and tall buildings. However, the Council encourage a mix of housing types to allow for housing choice.	No amendment considered necessary
	Buildings taller than 3 stories outside of the areas designated for tall buildings should be designed to avoid overlooking private gardens and must not disturb existing parking arrangements and capacity (creating capacity as needed).	Design Principle D2 (Overbearing & overlooking) provide guidance to address overlooking, with Design Principle D5 addressing Transport & Parking. However, parking provision is addressed by the London Plan (2021).	No amendment considered necessary
	Building finishes should be free of cladding and concrete where used should account for 50% maximum of visible finish. Traditional 'yellow' London brick should be encouraged.	The SPD provides guidance to material & detailing through Design Principle E3, specifically noting that an assessment of contextual material palettes and architectural features should be conducted as part of any application. This will allow the appropriate materials to be used on a development for the area in which it is located.	No amendment considered necessary
	Tall building must have fire escape routes and be made from the best fire retardant materials. All tall buildings should have a fire escape plan approved by LFB.	All planning applications are required to be supported by a planning statement, with more scrutiny and requirements for taller buildings.	No amendment considered necessary
	Buildings should be well insulated and be specifically considerate of hot summer weather. They should have effective heating with a low carbon footprint.	The SPD provides guidance on insulation through Design Principle F2 (Passive design). Policies also within the wider development plan also address such matters.	No amendment considered necessary
	Increases in housing capacity should be accompanied by expanded infrastructure - schools hospital GPs roads buses trains etc.	All new development over 100sqm of floorspace is required to contribute to the Community Infrastructure Levy (CIL), which is funding used to fund new, and improvements to infrastructure to cater for new development.	No amendment considered necessary
	Flash flood minimisation should also be a consideration for ALL new development on green/brown sites.	Policies in relation to flood risk and the associated level of detail to address this matter is set out in the wider development plan.	No amendment considered necessary
Tree planting and green spaces should feature.	Design Principle D11 (Greening) provides guidance on how developments should address green spaces.	No amendment considered necessary	

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

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

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

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

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

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

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



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

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

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

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

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

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

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



The importance of heritage and views when assessing context	<p>While heritage is considered within the SPD, we are concerned that it receives only a fleeting reference in the section on <u>context</u>. We appreciate that the text here is intentionally short, with the approach unpacked through the design principles. Nonetheless, we regard heritage as fundamental when considering context.</p> <p>Additionally, noting also that the Council has an adopted set of protected views, it is surprising that the flowchart on p16 does not prompt an applicant to answer if the location impacts on the landmark viewing corridor or the setting of a protected view.</p> <p>We believe that both omissions should be rectified. Also, we recommend further consideration of how the flowchart on p16 and the text on establishing context (paras 2.2.4 – 2.2.6) could be more neatly integrated, thereby setting a stronger platform for more detailed design objectives and principles that follow in section 3.</p>	Officers consider that the flow chart notes that heritage is one of a number of unique factors that contribute to the context of a place. This provides a reference point for further analysis for a development to undertake, including reviewing the planning policy maps, which will provide further information in terms of protected views, conservations areas and other heritage assets. Officers consider that the detail provided within the Design Objective B (Protect built and landscape heritage) and the design principles within this, provide a satisfactory level of guidance for new development. Officers will look to better integrate contextual considerations section with the flowchart.	Amend flowchart and contextual considerations text (Reformat)
Defining contextually tall	<p>We welcome the work done in the Characterisation and Tall Buildings study to identify prevailing heights across the Borough (also see section C of our letter). That said, we reserve judgement on the Council's approach to defining contextually tall as 2 times the prevailing height fails as it is unclear in policy terms how this will be used. While only a starting point, this approach requires nuance in its application.</p>	The term contextually tall seeks to deal with new development within suburban Harrow that is equal to or twice the height of the prevailing context. It is not intended to form a new definition of what is a tall building within Harrow, as the SPD is unable to introduce new policy. Policy D9 (Tall buildings) of the London plan (2021) sets a definition of what is a tall building, and the SPD acknowledges that. Furthermore, the local plan review will seek to implement a tall building policy for Harrow that will be consistent with the requirements set out in Policy D9.	
	<p>Additionally, if taken at face value, the table on p14 indicates that contextually tall is "greater than" the number given (i.e. greater than two times the prevailing height), not "equal to or greater than" as stated later in the document. This should be corrected.</p>	Officers agree that the table on page 14 does not have the correct symbol to demonstrate 'equal to or greater than'. Officer agree to this amendment.	Figure 2B has now been amended to ensure that it reads as 'equal to or greater than'
Overview of design guidance	<p>We broadly support the structure afforded by the thematic approach and the objectives underlying underneath each theme. Given there are several design principles that help to achieve the objectives, it may be helpful to include a table at some point that gives a summary of this structure.</p>	Officers agree that the inclusion of a diagram setting out the structure would be helpful for the usability of the SPD.	Figure 1A has been included on Page 6 to provide a clear layout and structure of the SPD.
	<p>We include some more specific comments in the appendix. In addition to those comments, we emphasize one detailed point of concern: we are not certain that the text on protected views on p31 accurately reflects the text in the Development Management Policies DPD, and risks summarising the approach to views in a way that could cause confusion in its application. We recommend aligning with the adopted DPD and/or referring to the DPD.</p>	The Guidance set out under Design Principle B2 (Development responds sensitively to protected views), highlights the requirement for development to consider the viewing corridors - which are set out in Policy DM3 of the Local Plan (2013). The policy provides sufficient detail on how developments should consider these, and the SPD does not intend to replicate this.	No amendment considered necessary
Beauty	<p>We wonder if the Council might consider including suitable reference to beauty in the SPD, supporting alignment with the direction of travel of the NPPF. We do not object to its omission, so mention this simply as an idea for consideration.</p>	Officers note that the term beauty has been introduced by Central Government in planning consultations. However, there does not appear to be a definition for this, or clarity on how this would be measured. Officers consider the terminology in the SPD to be understandable and appropriate.	No amendment considered necessary

Application process and requirements	We recommend adding the need for a statement of heritage significance, prepared early in the design process, to support understanding of the heritage significance of assets that may be impacted by a tall building proposal, and the wider character of the area. This can be expanded as appropriate to inform a more detailed heritage impact assessment or similar (see checklist 2 in our Advice Note on Tall Buildings, 2nd edition, 2022 for further information: <a href="https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/">https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/</a> ).	The supporting documents noted in the application process and requirements section is not intended to be an exhaustive list, rather a list that would be required in most applications for contextually tall buildings. However, applicants are directed at para 4.1.2 to review the Harrow Planning Application Validation Information Requirements (November 2020) for any application requirements.	No amendment considered necessary
Harrow & Wealdstone Opportunity Area	While our concerns regarding policy on tall buildings in the Opportunity Area cannot easily be resolved until a new plan is prepared, in the meantime, might the Harrow and Wealdstone Opportunity Area be added to the map on page 14 in the SPD, and the map be numbered as appropriate, so that this can be referred to as needed?	Officers agree that setting out spatially where the scope of the SPD applies would be helpful for users of the SPD. The harrow & Wealdstone Opportunity Area has been included.	The map on Page 14 as referred to has been amended to show the Harrow & Wealdstone Opportunity Area (Figure 2A). Inclusion of Figure 1B (Page 7) provides a map to also demonstrate where the SPD is applicable and where it is not.
Harrow Characteristic and Tall Building Study	We welcome work done to characterise the Borough and inform the Council's approach to tall buildings. The study includes some interesting and useful content, especially its data on prevailing building heights across the Borough and has a structure that offers the potential for a helpful degree of granularity. That said, generally, the study's coverage of the historic environment is disappointing.	The Harrow Characterisation & Tall Building Study (2021) is an evidence base piece of work that has been completed, and it not in a position to be revised at this stage. It does not form part of the SPD, rather assists in informing its drafting. The prevailing heights table has been incorporated in the SPD.	None.
<b>Suggested changes</b>			
(Page 6) Status	The Council intends to <del>further implement</del> <u>integrate</u> this guidance into a future Local Plan, giving it even greater weight as part of the borough's development plan.	Officers agree that the amendment better reflects the future intent of the guidance.	Para 1.2.1: The Council intends to integrate this guidance into a future Local Plan, giving it even greater weight as part of the borough's development plan.
(Page 9) Heading	Harrow <del>Local</del> <u>Development</u> Plan	Officers note that the heading is seeking to clarify the local planning documents, not the wider development plan which includes the London Plan (2021). This is also clarified in the planning policy hierarchy table on page 7.	No amendment considered necessary
(Page 10) 1.3.20	We welcome reference to our Advice Note on Tall Buildings; however, the quotation given in para 1.3.20 is from the first edition, which has been superseded. A second edition was published in 2022 and is available for download here.	Officers agree that the updated 2022 version should be referred to.	Para 1.3.20: Part 2 notes that the importance of a plan-led approach (paragraph 15 of the NPPF (2021)) which can be used to direct the location and development parameters of tall building development and help deliver sustainable development.
Page 26	Might it be possible and useful to add the map of Metroland within the Borough at this point?	Officers agree that setting out spatially where the scope of the SPD applies would be helpful for users of the SPD.	Inclusion of Figure 1B (Page 7) provides a map to demonstrate where the SPD is applicable and where it is not.

Page 28	Proposed height must respond <del>contextually sensitively</del> to existing (and consented) prevailing height across suburbia. What level of height is contextually appropriate will depend on an assessment of prevailing heights and the character and built grain of an area <u>(as outlined in section 2 above)</u> .	the SPD is a context based document and sets out how new development must respond to its context across suburban Harrow. Officers consider the term to be appropriate	No amendment considered necessary
Page 29 -	We suggest the addition of a short paragraph on the Borough's archaeological remains, informed by liaison with the Council's archaeological adviser, noting that built heritage and archaeological remains are not mutually exclusive e.g. Headstone Manor.	Heritage assets are covered in the guidance, which this would fall within. In any case, the risk of this occurring given the location of the assets would be minimal.	No amendment considered necessary
Page 29 (Picture caption)	Harrow features a diverse heritage landscape, with assets spread throughout the borough, from Conservation Areas to individual buildings and <u>registered listed</u> parks. Harrow-on-the-Hill <del>includes a significant number of</del> <del>is a unique repository of significant</del> period buildings and commanding views to St Mary's Harrow on the Hill form a vital part of the borough's overall character.	Officers agree that the suggested text provides better clarity to the picture caption.	Picture Caption; Page 29: Harrow features a diverse heritage landscape, with assets spread throughout the borough, from Conservation Areas to individual buildings and registered parks. Harrow-on-the-Hill includes a significant number of period buildings and commanding views to St Mary's Harrow on the Hill form a vital part of the borough's overall character.
page 30 - Design principle B1	3.4.3 Tall or contextually tall buildings can cause harm to <del>the significance</del> of heritage assets and their settings when inappropriately designed. All developments within the setting of a heritage asset must demonstrate consideration against the relevant Conservation Areas <del>SPDs and Management Appraisals, Management Plans and Design Guides. This includes Designated and non-designated heritage assets need to be considered, including:</del>	Officers agree that to insert the suggested term in relation to harming the significance of heritage assets. However, the relevant documents listed are consistent with the document titles that are published on the Harrow Council website. Officers therefore consider retaining these as listed.	Para 3.4.3: Tall or contextually tall buildings can cause harm to the significance of heritage assets and their settings when inappropriately designed. All developments within the setting of a heritage asset must demonstrate consideration against the relevant Conservation Areas <del>SPDs and Management Appraisals, Management Plans and Design Guides. This includes Designated and non-designated heritage assets need to be considered, including:</del>
	<ul style="list-style-type: none"> <li>• Conservation Areas</li> <li>• Local Areas of Special Character</li> <li>• Nationally Listed Buildings</li> <li>• Locally Listed Buildings</li> <li>• Scheduled <del>Ancient</del> Monuments</li> <li>• Historic Parks and Gardens (<u>Registered Parks and Gardens and locally listed parks</u>)</li> </ul>		<ul style="list-style-type: none"> <li>• Scheduled Monuments</li> <li>• Historic Parks and Gardens (Registered Parks and Gardens and locally listed parks)</li> </ul>
	3.4.4 When tall and contextually tall buildings are located in close proximity to heritage assets <del>and/or may impact on their significance and appreciation</del> , a highly sensitive approach to height, building form and material use must be followed <del>to ensure any new development complements heritage assets and does not detract from their heritage value.</del>	Officer consider that the draft text sufficiently addresses the approach to considering impacts on heritage assets from new development.	No amendment considered necessary

	Page 30 (Picture Caption)	<del>It is vital that new</del> development can enhance existing heritage assets. New housing at Bentley Priory sensitively <del>responds to</del> <u>addresses</u> the listed buildings and <u>Registered Park and Garden</u> at the site through appropriate scale, sensitive and referential material choice and neoclassical-inspired elevations. This allows for the addition of new homes whilst not competing with or detracting from the nearby <u>designated</u> heritage assets.	Officers agree with the amended text.	Page 30 (Picture Captions): New development can enhance existing heritage assets. New housing at Bentley Priory sensitively responds to the listed buildings and Registered Park and Garden at the site through appropriate scale, sensitive and referential material choice and neoclassical-inspired elevations. This allows for the addition of new homes whilst not competing with or detracting from the nearby designated heritage assets.
	Page 32 (Picture Caption)	Harrow's heritage is not limited to buildings or structures. Canons Park is a Grade-II <u>registered</u> <del>listed</del> park just north of the underground station of the same name. Resident enjoyment of the park and its character as a heritage asset are influenced by its open and verdant qualities. New contextually tall buildings must allow for the preservation of such landscapes and amenity and must not impede or compromise the open quality and amenity of such spaces.	Officers agree with the amended text.	Page 32 (Picture Caption): Harrow's heritage is not limited to buildings or structures. Canons Park is a Grade-II registered park just north of the underground station of the same name. Resident enjoyment of the park and its character as a heritage asset are influenced by its open and verdant qualities. New contextually tall buildings must allow for the preservation of such landscapes and amenity and must not impede or compromise the open quality and amenity of such spaces.
	Page 41 Public Realm	As the Council may know, Historic England has published guidance on the public realm, which is available for download here: <a href="https://historicengland.org.uk/images-books/publications/streets-for-all/">https://historicengland.org.uk/images-books/publications/streets-for-all/</a>	Officers agree that including a link to the Historic England guidance for public realm would be beneficial for applicants.	Para 3.7.11: The Design and Access statement must be supported by a robust, illustrated landscape strategy including management and maintenance proposals to ensure that the development is established and maintained in accordance with the above design objectives. For further information refer to Historic England public realm guidance; <a href="https://historicengland.org.uk/images-books/publications/streets-for-all/">https://historicengland.org.uk/images-books/publications/streets-for-all/</a>
	Page 54 - Design principle E4	We suggest adding a cross-reference to protected views when considering roofscapes	Any increase in height would to a building within the protected view corridors will need to consider impacts on these. However, officers do not object to a cross-reference to aid clarity.	Para 3.8.28 (end of); - Enlargements to roofscapes should consider impacts set out in Design Principle B2 (Development responds sensitively to protected views).
<b>6</b>	<b>Natural England</b>	SEA	No comments to make on the SEA	Noted
	Overall SPD Comment	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.	Noted	No amendment considered necessary

Question	Theme	Summary of Comments	Councils Response	Amended Text
<b>Question 1: The design guidance is separated into three areas to help set out an approach to successful development. Do you have any comments about this approach?</b>				
	Design	what is considered a high-quality design? this is not very clear and again "socially and economically" inclusive on what percentage? 100%? this is not very clear.	The SPD sets out design guidance which follows best practice principles, which when applied should ensure that new development is of a high quality design.	No amendment considered necessary
		It sounds ideal, but the terms "right location" and "high quality" are subjective .	The SPD provides guidance on these matters, and is unable to provide definitive locations as this must be done through the local plan review. High quality design is subjective, however the SPD seeks to provide guidance based on best practice, and ensure that scrutiny from professionals is part of the decision making process (use of Design Review Panel etc).	No amendment considered necessary
		Produces designs in keeping with locality	The SPD sets out guidance on how to understand the context of an area where a new development is being proposed. As part of that assessment, an understanding of the design queues in the area must be understood, with new development respecting these. This will assist with new development respecting the locality in which they are located.	No amendment considered necessary
161		Stop building high buildings in inappropriate locations blocking historic views from Harrow to Harrow Weald	The SPD includes guidance on understanding appropriate locations in relation to impacts on heritage assets (Page 18), and then a specific objective (Objective B) and principles (B1 (Responding to heritage assets), B2 (Protected Views), and B3 (Historic landscapes & open space)) for applications to be considered against.	No amendment considered necessary
		The thing I notice on all new builds is the exteriors become dirty and marked quickly, so they look great at the start and quickly deteriorate into scruffy looking buildings. EG walls get marked from extraction from clothes dryers. Should be some onus on the developer to deal with this matter so the buildings stay well designed and of good appearance.	Noted. The SPD provides guidance (Principle E3 (Materials & detailing)) which seeks to ensure high quality materials are used in new development whereby hard wearing materials should be used to ensure developments retain a high quality appearance.	No amendment considered necessary
		The theory is ok but the implementation isn't. The new buildings shown as being 'sensitive' new development e.g. page 27, are too high against the surrounding buildings and are ugly in style.	The SPD provides guidance as to height in relation to its context and also design principles. The precedents used are to demonstrate what has successfully worked elsewhere. They are not used with the intention that they are replicated across Harrow, as new development would have to respond to the context within which it would be located.	No amendment considered necessary
		How much say will the council have over architecture? Developers have adopted a copy and paste attitude to architecture. All the new buildings in Harrow look exactly the same. What is the Council doing to promote better architecture such as, The Rye by Tikari Works or Ordnance Road in Enfield by Peter Barber Architects mentioned in the SPD as examples of good architecture?	The Council is the decision taker for planning applications, and the acceptability of the design of a scheme is a material consideration in the determination of an application. The SPD will provide further tools for the Council to consider applications against, and where they do not meet the guidance set out in the SPD (and wider development plan), the Council is able to refuse an application. Buildings that lack architectural merit as noted will be able to be resisted.	No amendment considered necessary

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

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

		As has been pointed out both by HM Government and HM Opposition, there is an urgent need for more housing in Britain. While these design principles are laudable, more needs to be done to make sure that they do not lead to lengthy permitting processes and could be used as excuses to block high quality high density housing within the borough.	the SPD does not provide a presumption for or against development. Rather it seeks to ensure development is located within the right location and respects the context within which it is located.	No amendment considered necessary
	<b>Safety / Mental Health / Social</b>	No. What about making residence happy more tall building mean reduce light, meaning mental health can suffer more.	The intent of the SPD is assist in ensuring new development would create high quality homes and spaces for future occupiers.	No amendment considered necessary
		Location, architecture and encouragement of the right kind of growth are all important but are fairly meaningless if safety cannot be guaranteed	The guidance within the SPD seeks to ensure a high quality of design, which will assist in providing a development that will be safer for both occupiers and those moving around the building / development. Building safety will be ensured through compliance with Building Regulations, for which all new development must comply with.	No amendment considered necessary
	<b>Guidance</b>	Chapter 3 is too long, detailed and boring for anyone outside a planning department or a property lawyer to want to understand its detail. You need to find another way to get the answers you are after.	The guidance seeks to strike a balance between text, images and ensuring an appropriate level of guidance for developments that by their nature, may potentially cause harm to suburban Harrow. The guidance seeks to provide an appropriate level of detail for a range of users of the document, ranging from the public, developers, planning officers and elected members.	No amendment considered necessary
164		It's not definitive enough, being vague leaves them open to a wide range of interpretations.	The SPD is drafted in a manner to not be overly prescriptive. Design led developments are able to achieve a successful scheme through a number of approaches, and design creativity should not be stifled by overly prescriptive guidance. However, it does set a benchmark for what is considered good design, and all new development should at least meet or exceed this.	No amendment considered necessary
		Language is very political and confusing	The language in the SPD must be appropriate for a range of users who may be required to consider the document, from residents, developers, planning officers and elected members. Officers consider that the language strikes the right balance.	No amendment considered necessary
		It appears to be couched as guidance with few, if any, mandatory elements and much of it is highly subjective. I suggest mandatory elements be identified and specified as such.  The language used will often have little force, eg at 3.8.6 it reads "Rooftop plant should not be visible and should be appropriately concealed ....". The "should" is an ambiguous term and is not necessarily read as a requirement (eg "I should go to the gym ..." but I probably won't). If the intention is to impose a requirement then better language would be "Rooftop plant must not be visible ...". If you wanted you could add in something like "Except in exceptional circumstances ..." but you would then have to give guidance on what is "exceptional" to close an obvious loophole.	Officers consider that the term 'should' is appropriate for this level of guidance, as a building that is contextually tall, is likely to still be at a height that may not enable any required roof plant to be completely invisible. Taller buildings are more able to achieve this through their height when viewed from street level. However, contextually tall buildings that cannot locate the roof plant to not be visible, must then it should be appropriately screened. Failure to address either would be unacceptable.	No amendment considered necessary
	<b>Infrastructure</b>	The SPD appears to skimp over the requirements for parking, the statistics for the U.K say that households have around 1.6 cars, there is no rule on provision for this in the planning. It also refers to siting near transport hubs, while we have a good system it is heavily overloaded during peak hours, there is no easy way to resolve this. You may remember the early planning for Crossrail in 1991 a branch to Harrow was considered.	Design Principle HD5 (Transport & Parking) notes that parking must be provided to accord with requirements as set out in the London Plan (2021), which sets parking levels for the borough. The SPD is unable to depart from these or provide new thresholds.	No amendment considered necessary



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

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

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

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

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

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

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

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



		This should apply to central Harrow's residential areas too.	The SPD scope is the suburban areas of Harrow, and does not cover the area designated within the development plan as the Harrow & Wealdstone Opportunity Area. Opportunity Areas are designated areas within the London Plan (2021) where development is directed to, given their sustainable locations and ability to accommodate growth. However, development within an opportunity areas must still accord with the relevant policies within the development plan, which still seek to protect residential amenity and the character of the area - noting that opportunities are subject to change given the growth envisioned for them.	No amendment considered necessary
		The definition is too weak. The presumption should be against building above the prevailing height. The guidelines should then give examples of the limited circumstances in which special permission should be given to go higher - e.g. for hospitals where available land would not otherwise permit sufficient capacity for Harrow.	The SPD does not provide a presumption against developments that would be considered contextually tall, provided that they are appropriate for the context within which they are located, and accord with the guidance as set out in the SPD (and relevant policies within the wider development plan). A SPD is unable to provide policy which would restrict height or land use, such an approach must be undertaken through the local plan review.	No amendment considered necessary
		Please also take into account the Light blockage impact on nearby residential blocks of flats and impact of additional residents population on local area congestion.	Design Principle D4 (Orientation and neighbouring sites), Design Principle D4 (Residential Amenity), and Design Principle D8 (Daylight and overshadowing) all seek to ensure that new developments do not unacceptably harm light levels to adjoining properties. Community Infrastructure Levy is secured from new developments to assist with essential infrastructure that will assist in addressing congestion.	No amendment considered necessary
		I think other priorities are more important - in the current cost of living crisis, allowing for high quality, affordable housing for Harrow residents in tall building next to train stations is much more urgent than defining "contextually tall" building norms.	The progression of this guidance is a priority of the administration. The SPD seeks to ensure the right type of development in the right locations, which will assist in delivering the high quality, affordable housing for residents.	No amendment considered necessary

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

		too much open to interpretation. people in our street typical Metroland already disregard cues and styles in the area and we have several unsuitable unsympathetic extensions. They have often ignored planning permission and when we have let the council planning know we were ignored. If this is to work the planning people need to be more assertive and make everyone stick to the plans.	The SPD provide much more clarity for new development, especially where further height is proposed, as this where potentially more harm is felt on a wider scale. With explicit guidance for new development (not so much for most householder extensions), this allows the Council to ensure that developments are of a high quality design as the guidance, once adopted, provides clarity for developers and officers alike.	No amendment considered necessary
		These were reasonable but I go back to my point about needing to support future generations and find more ways of building more homes. "Metroland" was fields once and we have all benefited from the substantial change the development brought. Seeking now to only conserve is not fair for those coming after us.	The Council understand the need to deliver more new homes, with the development plan geared towards assisting this in the right locations and the right types of homes. The SPD is intended to assist in new development from a character and design perspective, which will assist in high quality developments regardless of use.	No amendment considered necessary
		In my view, lots of weight must be given of all suburban residential context as these are the people living in the borough.	Agreed. The four working examples seek to demonstrate what are the most common typologies across the borough, which can be used as a basis for determining the context a proposal is seeking to be located within. These may require amending for locations that do not fit specifically into one of the examples, and should accurately represent the character of any specific area.	No amendment considered necessary
		The seem well chosen	No further comment	No amendment considered necessary
		In my opinion these focus too closely on height, at the expense of other measures of density. Some also seem very homogeneous.	The SPD seeks to ensure that height is appropriately addressed in new development that occurs within suburban Harrow. The density of development should be design led, and officers consider that through appropriate design and optimising a site is able to be achieved by applying the guidance within the SPD.	No amendment considered necessary
		I find these confusing. Are you saying that these are just examples of local Harrow environments (agree with this) or that someone will be able to build e.g. a 7 storey block of flats abutting the back gardens of suburban houses? This purpose should be made clear on the pages.	The working examples seek to provide examples of typical Harrow place types and the contextual factors which would impact attempts to develop sites within these typical places. They are not intended as a guide for how high or contextually high buildings could be created, but simply set out the contextual factors developers must consider in these locations when proposing a development, including thinking about an appropriate height within such a setting.	No amendment considered necessary
		1. First example invades into privacy of all residents from their backyard. Sunlight issues as well. 2. It is okay 3. Ok. Noise pollution for the new resident is an issue, but there for all residents of that location anyhow. 4. Not ok. Privacy/sunlight issue for existing residents. It can be developed as single corner building (in line with second worked up example) and few regular height buildings.	The working examples seek to provide examples of local Harrow environments, and do not show new developments within them. The working examples are present to demonstrate how context needs to be considered. Any new development will need to be considered against the design objectives and principles.	No amendment considered necessary
		Well planned. However in areas such as Harrow town centre or high streets where there are no residential properties within eyeshot, you can build higher. Provided it is not intrusive of residents' land or private areas in the immediate vicinity.	The SPD does not cover Harrow Town Centre. However, other town centres are within its remit, and where appropriate, further height may be appropriate subject to consideration against the design principles within the SPD.	No amendment considered necessary

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

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

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

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

		<p>It is not a traffic light system - which is based on red, amber and green.</p> <p>- This system is too simple to deal with complex developments. A proposal under this system could be given a Yes, but still not be appropriate.</p>	<p>The traffic light system has been replaced with a flow diagram. It is only to determine if a proposed development is, in relation to its context, a contextually high building or not. Regardless of its context, if it is more than six storeys, then it is defined as a tall building as per Policy D9 (Tall buildings) of the London Plan (2021). The flow diagram is not intended to determine the acceptability of a development, rather what level of guidance (if any) needs to be considered in relation to a proposal.</p>	<p>The traffic light system diagram on page 14 has been replaced with the flow diagram (figure 2L) on page 24.</p>
		<p>This is open to interpretation. Who is defining contextual conditions?</p>	<p>Any relevant planning application will have to be supported by a design &amp; access statement / planning statement that will be required to undertake a context analysis of the locality for which a development is proposed. This will need to be undertaken by the applicant's design team. Any context analysis will then be reviewed by the Council planning officers (and where applicable, the Design Review Panel) to consider if this has been undertaken satisfactorily in terms of the SPD and for the scale of development.</p>	<p>No amendments considered necessary</p>
		<p>The diagram could be clearer asking one question at a time, i.e. is the proposed building tall (define tall)? Is the proposed building contextually tall (define what contextually is by reference to the relevant page in the SPD. Let the answers to each question flow to a decision or outcome presented as a flowchart.</p>	<p>Officers have revised the traffic light system, replacing it with a flow diagram. The flow diagram seeks to provide a process to determine if a proposal would constitute a contextually high building in a specific location. it provides links at each step to assist in addressing the relevant steps to determine a contextually high building or not.</p>	<p>The traffic light system diagram on page 14 has been replaced with the flow diagram (figure 2L) on page 24.</p>
		<p>There is an important sense error in the diagram. Tall I understand to be "6 or more storeys". The green box to which the "No" answer leads reads "The proposal is not more than six storeys tall ... ". A building of six storeys meets the criterion of being "not more than six storeys". The green box should I believe read "The proposal is less than six storeys ...". This would be consistent with The London Plan 2021 which at eg 3.9.3 requires a council to define a tall building but says this "should not be less than 6 storeys" - ie LBH can define a building of 6 storeys as tall. LBH should also incorporate the 18m definition of the London Plan (just in case).</p> <p>But I do strongly agree with the traffic light system, subject to the changes I have indicated above.</p>	<p>The Council agree that the wording requires clarification to accurately reflect the definition of a tall building as set out in Policy D9 (Tall building) of the London Plan (2021). Officers have removed the traffic light system and replaced with a more simplified flow diagram. The flow diagram only relates to how to determine if a proposal would constitute a contextually high building. Such an exercise is not required for buildings that would meet the London Plan (2021) definition, as this is not subject to a contextual analysis.</p>	<p>The traffic light system diagram on page 14 has been replaced with the flow diagram (figure 2L) on page 24.</p>
		<p>The No route appears to say that any building can be built to six storeys if the prevailing height is 3 storeys. I disagree strongly with this.</p>	<p>Officers have removed the traffic light system and replaced with a more simplified flow diagram. The flow diagram only relates to how to determine if a proposal would constitute a contextually high building. Such an exercise is not required for buildings that would meet the London Plan (2021) definition, as this is not subject to a contextual analysis. Proposals that do not meet the contextually high definition are not automatically considered acceptable.</p>	<p>No amendments considered necessary</p>
		<p>Many developers will find a loophole through this so you will need to consider some applications and keep the ability for special circumstances.</p>	<p>All planning applications are considered on their own merit. Where an applicant does not apply the guidance for a relevant development, Harrow Council Planning Officers will require this assessment to be undertaken.</p>	<p>No amendments considered necessary</p>
		<p>I don't fully understand this system. The overriding comment I need to make is STOP ALLOWING TALL BUILDINGS TO BE BUILT. ENOUGH FUTURE GHETTOS ARE ALREADY HERE!</p>	<p>The SPD cannot (legally unable to) stop development, rather it looks to guide development to be of an appropriate height and of a high quality design. The Local Plan review will look to include a tall building policy which will identify appropriate heights and locations.</p>	<p>No amendments considered necessary</p>



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

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

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

		<p>1. Section C2 on page 34 needs to be expanded to clarify what 'overly prominent' means. This is core.</p> <p>2. What is para 3.5.9 about? I walk wherever possible and know a lot of local residents who do likewise and never has anyone said a taller building would help them get around.</p> <p>3. On page 36 the right-hand drawing is an example of what SHOULDN'T be allowed. The taller building is indisputably overbearing and fails design principle D2.</p> <p>4. 'Under-utilised sites within their suburban context will not be supported' (para 3.10.5) contradicts 3.10.4 (which says 'Optimising does not mean maximising') and should be deleted.</p>	<p>1. The intent of Design Principle C2 (Prominence and townscape impact) is that tall and contextually tall buildings can cause harm by being overly prominent. What is overly prominent will vary from site to site by reason of the context in which a development is located within. A singular definition in terms of a building height would not be appropriate given this would be different to each context.</p> <p>2. Para 3.5.9 (Design Principle C3) seeks to ensure that new development that is tall or contextually tall addresses the street pattern. This includes ensuring that such a development would not be at odds with the street pattern, but can also assist those pedestrians who are visiting an area. The SPD is not promoting tall or contextually tall buildings.</p> <p>3. The image shown on page 36 is demonstrating how mass should be arranged to ensure satisfactory light to neighbouring properties, it is not intended to demonstrate an overall acceptable development.</p> <p>4. The key message is that a site must be optimised. this does not mean maximising the site area where other requirements of the development plan are now able to be provided (play space for example). Conversely, developments that provide too little development will not efficiently use the site where more development could be accommodated, but still be expected to deliver against all the obligations of the development plan.</p>	No amendment considered necessary
		If optimising land use means building tall buildings at/near Tesco then I very strongly disagree. You are destroying our neighbourhood	<p>Optimising land means that a development makes efficient use of a site, in terms of ensuring that development uses the site and delivers against all of the policy requirements that make a high quality development. Maximising development on the site is not encouraged, as this often leads to policy or guidance not being satisfactorily addressed within a proposal.</p>	No amendment considered necessary
		Overall the objectives make sense on paper. In reality, Harrow has already suffered from more street crime and drug crime recently. Sexual assaults have increased too.	<p>The SPD is a design document to assist in ensuring new development respects the character of suburban Harrow. It will assist also in ensuring public spaces are designed in a manner to reduce crime, with consultation with the Metropolitan Police encouraged.</p>	No amendment considered necessary
		<p>Picture under 3.5.2 on page 33 is shown as a 'good' example of accommodating height. However if you look at the original buildings on the right hand side of the picture it is obvious that the new blocks are too high, too angular and just out of keeping with the area.</p> <p>The infrastructure in Harrow is already struggling to support the existing population density e.g. roads, public transport, NHS, education etc. Why is it assumed that we need to have taller buildings which will just exacerbate the problem? There is already over development of existing properties when such large increases to floor area are allowed.</p>	<p>Officers agree and note that design is a subjective issue. A number of the precedents used have been revised. Officers consider that the revised precedents provide high quality design, and specifically in relation to the design principle it is associated with. The matter in relation to infrastructure has been addressed elsewhere in the consultation responses.</p>	No amendment considered necessary

		<p>I agree with most of the above. I believe the right kind of homes is what's needed. Family homes. Social housing. At the moment developers are building 'luxury flats' for profit, but paying lip service to social housing. All the luxury flats are the same: 1-2 bedrooms. Why? We don't need any more flats especially not in the Opportunity area.</p> <p>With 7000+ houses built in the last 10 years because there's a housing crisis, you'd think the purpose would be building what's most needed, rather than what's most profitable.</p> <p>You mention economic growth. There is no economic growth in Harrow. All major employers such as GE, Wickes, HMRC, NHS have moved to other boroughs. Most retail units in mixed developments are empty. What are the other borough doing to deliver economic growth, You can't just build housing with no jobs, social or community infrastructure.</p>	<p>The Council has no control over where market homes are sold. Planning mechanisms allow for the Council to seek where thresholds and viability allows, a mix of affordable housing types. However, cannot set where market homes are sold. The SPD seeks to assist with economic growth through providing guidance for non-residential floorspace. The local plan review will seek to further address economic growth issues, as it is more able to control and direct land use than what an SPD is able to.</p>	No amendment considered necessary
		<p>"1930s leafy areas" characteristics of Harrow, as described by the planning portfolio-holder, have changed over the time, and the planning policies should reflect this. Census 2021 shows: Between the last two censuses (held in 2011 and 2021), the population of Harrow increased by 9.3%, from just under 239,100 in 2011 to around 261,200 in 2021. In 2021, Harrow was home to around 37.0 people per football pitch-sized piece of land, compared with 33.8 in 2011. Harrow saw England's joint largest percentage-point fall in the proportion of households that owned their home (from 65.3% in 2011 to 58.8% in 2021). In 2021, 45.2% of people in Harrow identified their ethnic group within the "Asian, Asian British or Asian Welsh" category (compared with 42.6% in 2011), while 36.5% identified their ethnic group within the "White" category (compared with 42.2% in the previous decade)]</p>	<p>the Harrow Characterisation &amp; Tall Building SPD (2021) provides an updated characterisation snapshot of the borough from a character perspective. This has helped to inform the SPD. However, the local plan review will provide an updated borough profile, and policies will respond accordingly.</p>	No amendment considered necessary
		<p>Large developments will take longer to build and will cause more blight, noise, mess and disruption. A quiet area will be badly affected. The scale of works has to be considered as well as part of the area's context.</p>	<p>Constructions works can be a nuisance for existing neighbouring residents. However, such works are temporary and planning informative can be included in any grant of planning permission in relation to hours of work on site and considerate contractors.</p>	No amendment considered necessary
		<p>Objectives D-I are irrelevant to taller buildings specifically. They confuse and muddle the policy, which should be much more focused on a clear presumption against developing buildings that are taller than the current prevailing height in suburban areas.</p>	<p>The SPD is unable to provide a provide a presumption against buildings that are less than that defined tall by Policy D9 (Tall buildings) of the London Plan (2021). The SPD seeks to provide guidance to ensure that buildings respect the character of suburban Harrow and are of a high quality design.</p>	No amendment considered necessary
		<p>Objective H may clash with the rest. See my comments on the previous page re the difference between high-quality design and construction.</p>	<p>The Council acknowledge that there is pressure to deliver the homes required of it by the London Plan (2021). However, there is a very clear direction from both regional and central government that the character of an area must be respected, and that new development must be of a high quality. Officers consider that the SPD provides the guidance necessary to assist in ensuring new development is of a high quality, and the pressure of delivering new homes should not compromise achieving this.</p>	No amendment considered necessary
		<p>overdevelopment is a no . Maintaining front gardens and back gardens and all types of greenery should be first priority; planning should be restricted</p>	<p>The SPD seeks to ensure that overdevelopment does not occur through the guidance contained within it. Guidance on greenspace and playspace is set out within the SPD (Design Principles D4 &amp; D11)</p>	No amendment considered necessary

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

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

		<p>Make good all the poorly maintained older existing homes. Renovate old derelict buildings. Convert old existing tall buildings as livable dwellings. Improve infrastructure, roads etc make parking easier for shoppers. All these changes will raise local economy and provide new homes whilst making the residential and commercial areas look better bringing in further private money.</p>	<p>The SPD is seeking to assist new development where further height is proposed, to ensure it would respect the character of suburban Harrow and be of a high quality design. However, there is no objection to development occurring as set out in this response.</p>	<p>No amendment considered necessary</p>
		<p>As before for C above 1:1 height to sustain character, not doubling height H above, Do we really need more people in Harrow I above, for economic growth we need to match new workplaces with proposed new homes, also all services, hospitals, schools, etc. should match and upgraded or new to cater for the new people</p>	<p>The SPD seeks to ensure that new development is contextually appropriate, and where extra height would be appropriate, it would be of a high quality design. The SPD is not a document that seeks to increase the population of Harrow. New development will in most circumstances (subject to scale and use) attract a Community Infrastructure Levy, which is funding that is used to fund new infrastructure such as those noted in the response.</p>	<p>No amendment considered necessary</p>



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

		It will only work if you follow your own policies. Policies in the Harrow and Wealdstone Area Action Plan are not being followed. The Safari Cinema flats are 11 storeys in an area slated for maximum 6 storeys.	All planning applications must be considered against the development plan (both Harrow Local Plan (2013) and the London Plan (2021)). The SPD would not apply at this site as it is located within the Harrow & Wealdstone Opportunity Area.	No amendment considered necessary
		1. Realistic parking provision must be required in large developments. The calculation for residences should be an average of car ownership rates in the local neighbourhood. For businesses it depends on expected customer and staff numbers. If no provision is made developers must quantify the number of available parking areas and their usage nearby and how the estimated vehicle ownership rate will impact them. 2. People socialize. High-density housing buildings should be built with large function rooms that can be hired by residents only for big social events. That way, residents can hold parties without blighting quality of life of their next-door neighbours. 3. Rooftop terraces should be treated with suspicion because all noise made will carry further into the neighbourhood, and because the need for safety barriers adds effectively an extra storey. Balconies are also prone to more noise.	1. Car parking is determined in accordance with the relevant policies within the London Plan (2021). Any departure from these would need to be demonstrated on a case by case basis as part of a planning application. 2. The SPD is unable to require ancillary floorspace for flatted developments. Housing must meet the Nationally Prescribed Internal Space Standards. 3. Care must be taken when proposing roof top terraces for issues such as noise and overlooking. Design Principle D4 (Residential amenity), Para 3.7.15 provides some guidance for roof terraces.	No amendment considered necessary
		The additional validation requirements for contextually tall buildings is very onerous considering this could be an application for a building just 4 storeys tall. Requiring a Microclimate Assessment in this instance is unnecessary and will just deter applicants. The requirements should be required on a case by case basis, many will be required anyway. A 4-storey "contextually tall" building could still be a minor application, and these requirements are challenging.  HGH previously submitted representations to the consultation on the Harrow Characterisation and Tall Building Study, noting that: - the approach was innovative but a mathematical formula is not appropriate for the complex and challenging situations that arise between sites of different natures - the approach is likely to be overly conservative, particularly with regard to the town centre (prevailing heights are given as 4-5 storeys) - the document was contradictory in identifying Central Harrow as both suitable for and sensitive to tall buildings - the document did not acknowledge planning policy supporting the optimisation of under-utilised land within settlements for homes - no acknowledgement that buildings exceeding the suggested height limit might be appropriate in cases where there are merits to do so	1. Microclimate is not a required document as set out in the the PAR, although a wind study is for tall buildings (more than 30m). Officers note that in not all instances a microclimate assessment would be required, and this is something that ought to be discussed with the LPA during pre-application stage, and confirmed or otherwise on a case by case basis. Officers have amended the text accordingly. 2. The consultation undertaken is in relation to a SPD, and not the Harrow Characterisation and Tall Building Study (2021). The Council is not seeking feedback on this evidence base document. However, the Characterisation Study is an evidence base document, noting the many conflicting interests when dealing with developments that propose additional height. For the purposes of the SPD, the evidence within it has been used to seek to ensure new development protects the suburban character of Harrow.	Revision to paragraph 4.1.4: The following are assessments that are specifically typically required to be submitted where an application proposes buildings of height. This list is not intended to be exhaustive, and applicants should review the Planning Application Requirements for further supporting documents. Engagement with planning officers through the pre-application process can assist in finalizing supporting documents on a case-by-case basis.
		The proposals are generally too weakly worded to ensure buildings are high quality. Much of the recent or fairly recent build in Harrow has been of lamentably low quality - eg the flats over the Nita Cash and Carry at 186 Pinner Road, and, the central Harrow Morrisons development. I suggest Harrow require developments to be high quality and development objective means for assessing whether that is achieved.	The intent of the SPD is to improve future developments, as once adopted it will become a material consideration in the determination of planning applications. There is currently no contemporary local design guidance for such developments. The SPD is worded in a manner to ensure that it is not overly prescriptive and allows for design innovation to occur, whilst adhering to design principles to ensure a high quality design is achieved.	No amendment considered necessary

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

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# Tall Buildings (Building Heights)

Supplementary Planning Document

London Borough of Harrow  
July 2023



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

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

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

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

Graphic Design by London Borough of Harrow.

Published July 2023

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# Foreword

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

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

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

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



Aerial view of Kenton, London Borough of Harrow<sup>w</sup>



1.0

# Introduction

- 1.1.1 The Council recognises Harrow's place as an outer London borough, and is seeking to achieve sensitive densification of its suburban areas. This will result in more development on previously developed or underdeveloped land, or redevelopment of existing sites with additional density appropriate for the suburban context.
- 1.1.2 To achieve this aim in a sensitive manner, development must be highly responsive and respectful of prevailing heights to preserve the existing character of the borough's suburban areas. Specifically, development should have regard to areas of Harrow that have a suburban or village feel to them, and not have a detrimental impact on that character. Where height is to be brought forward, this will be done in the right location and be of the right quality.
- 1.1.3 Many of the benefits associated with tall buildings apply to higher density schemes of all types rather than tall buildings per se. Compact living can reduce energy consumption per household, give good access to shops and services and support these uses; and encourage active and public transport, reducing reliance on private motor vehicles. Buildings with additional height may also assist in delivering community facilities and amenities that residents need, so Harrow becomes the place they want to spend their time and money, creating a thriving local economy and supporting local Harrow businesses.
- 1.1.4 However, these benefits can only be realised if the social infrastructure, commercial uses and public transport are in place to support a shift in behaviour. High density living without these surrounding characteristics can result in overcrowded, isolated and car dominated areas.
- 1.1.5 The Council see the Tall Buildings (Building Heights) Supplementary Planning Document (SPD) as an essential way to maintain the spatial character and value of Harrow as an Outer London borough and the following guidance in this document is clustered around the three themes of addressing place, quality architecture and delivering good growth.
- 1.1.6 The focus for Harrow will be to provide a range of homes across the borough, with typologies that suit their context (both in terms of townscape and quality of life) and can integrate well with surroundings. Fundamentally, to meet housing need the focus will be on appropriate density rather than tall buildings. Tall buildings should be considered exceptional, both in their frequency and in their design.

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

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

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

## Chapter 1: Introduction

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

### Key topics covered:

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

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

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

### Key topics covered:

Prevailing height  
Context analysis  
Contextually high definition

## Chapter 3: Design Objectives and Principles

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

### Key topics covered:

Place, Architecture & Good Growth themes  
Design Objectives  
Design Principles

## Chapter 4: Application process and requirements

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

### Key topics covered:

The application process  
Supporting assessments  
The planning process

Figure 1A

# Where to use this document

# 1.3

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

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

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

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

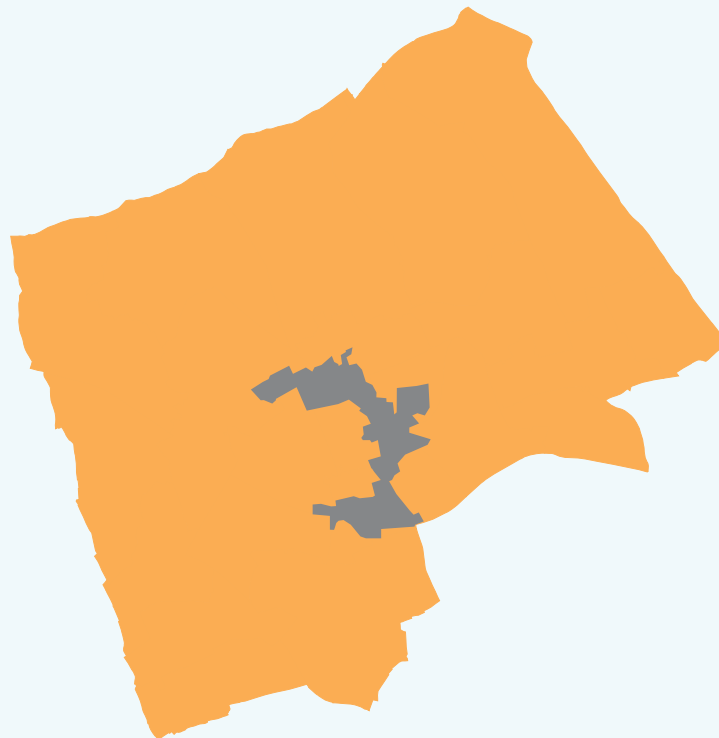
## London Borough of Harrow



Area where Tall Buildings (Building Heights) SPD applies



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



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

Figure 1B

# Status of this document

# 1.4

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

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

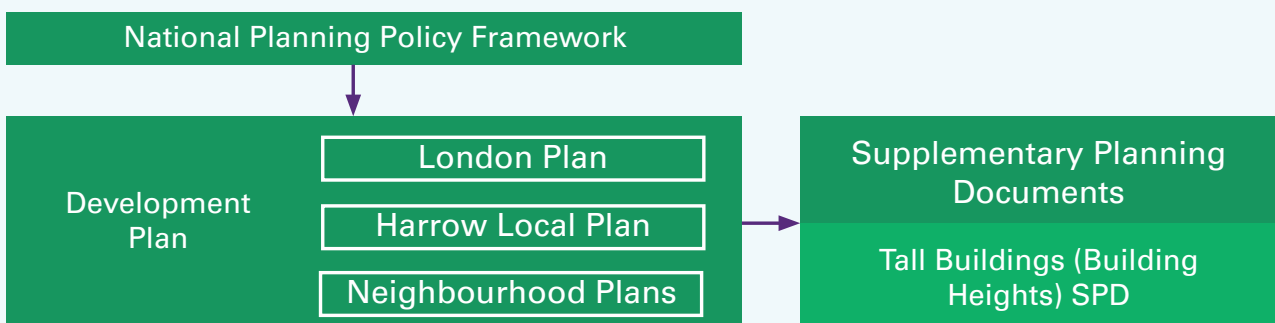


Figure 1C

## Why has this Supplementary Planning Document been prepared?

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

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

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

## The planning policy hierarchy

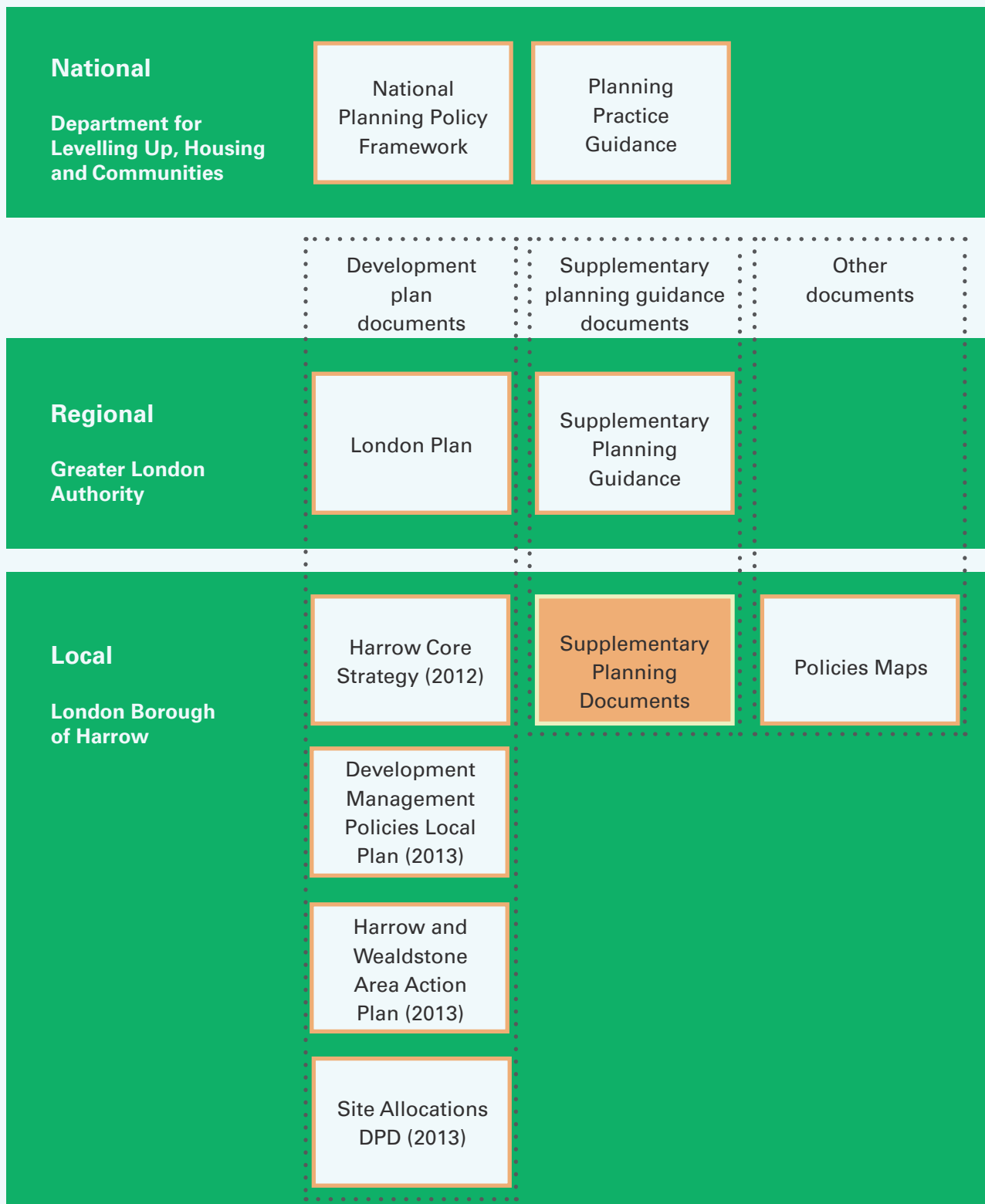


Figure 1D

## National Planning Policy Framework (2021)

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

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

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

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

## London Plan (2021)

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

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

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

## Harrow Local Plan

- 1.6.9 Within Harrow, the development plan is made up of the London Plan and the:
- A. Harrow Core Strategy (2012)
  - B. Harrow Development Management Policies Local Plan (HDMPLP) (2013)
  - C. Harrow & Wealdstone Area Action Plan (2013)
  - D. Site allocations DPD (2013)
  - E. Policies Maps
- 1.6.10 The Harrow & Wealdstone Area Action Plan (2013) provides detailed implementation policies, including tall buildings / building heights / site allocations. Development within the Harrow & Wealdstone Opportunity Area must respond to policies within the Harrow & Wealdstone Area Action Plan (2013).
- 1.6.11 This SPD does not apply within the Harrow & Wealdstone Opportunity Area. Opportunity Areas are designated through the London Plan, and are noted as areas where growth is directed to and are subject to significant change. It is recognised that the Harrow & Wealdstone Opportunity Area represents where growth has been strategically directed to over the local plan period, and as such has already undergone significant change including many tall building developments. This SPD only applies to the suburban context of Harrow, which is outside of the designated Harrow & Wealdstone Opportunity Area, where the development plan does not envision such significant change and development opportunities.
- 1.6.12 Currently, the Harrow Development Management Policies Local Plan (2013) does not contain a specific policy in relation to tall buildings. By reason of this, there are no areas outside the Opportunity Area within the borough that are identified as being appropriate or inappropriate for tall building development.
- 1.6.13 Policy DM1 (Achieving a High Standard of Development) provides policy seeking to ensure that all developments must achieve a high standard of design and layout. Specifically in relation to height, Policy DM1 sets out that in assessing design and layout, applications must have a regard to massing, bulk and height in relation to the location in which it is situated. It goes onto provide direction to assess the context provided by neighbouring buildings and the local character and pattern of development. Full text of Policy DM1 (Achieving a High Standard of Development) is set out below as Figure 1E.
- 1.6.14 This SPD provides additional detail and design guidance in relation to DM1, specifically to assist applications address the assessment requirements for buildings that are proposed as higher than their suburban surroundings. Tall buildings (as per the London Plan (2021) or contextually higher building applications will need to consider all other relevant policies within the Development Plan.
- 1.6.15 This SPD provides guidance in relation to determining what would be defined as a contextually high building in suburban locations, along with guidance to ensure a high quality development is delivered. There may also be other relevant SPDs subsequently adopted by the Council and the Council's website should be reviewed to identify these.
- 1.6.16 Guidance provided within this SPD will inform a tall buildings policy within the new local plan.



Figure 1E



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

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

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

- 1.6.18 Historic England's guidance on tall building's is set out in 'Advice Note 4'. This document reflects the importance of preserving the historic environment when planning for tall buildings. Historic England recommend that local planning authorities adopt a plan led approach to managing tall buildings.
- 1.6.19 Part 2 notes that the importance of a plan-led approach (paragraph 15 of the NPPF (2021)) which can be used to direct the location and development parameters of tall building development and help deliver sustainable development.

2.0

# Understanding height and Harrow's suburban character

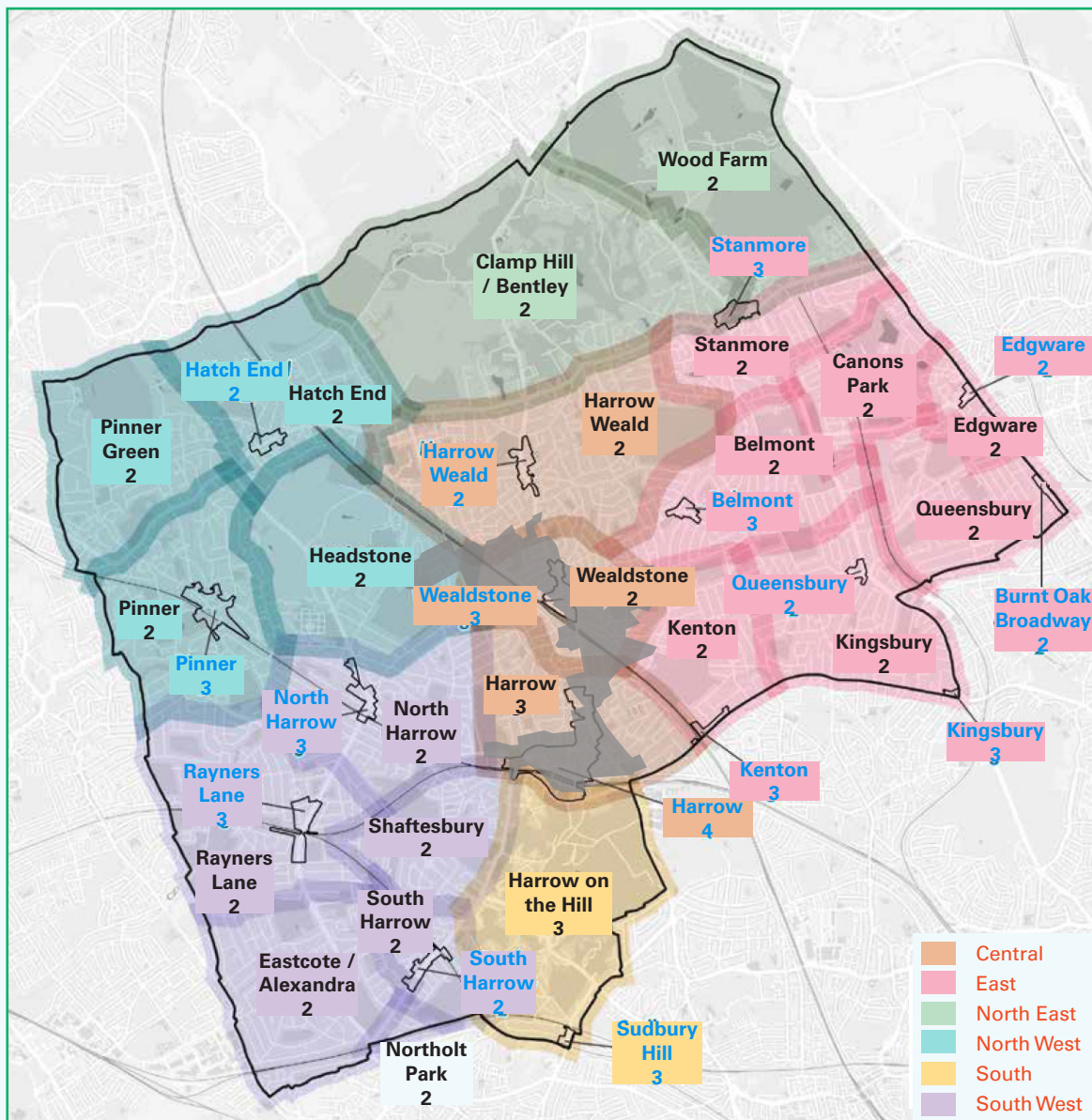
## Establishing existing prevailing heights in Harrow

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

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

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

Figure 2A



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

Figure 2B

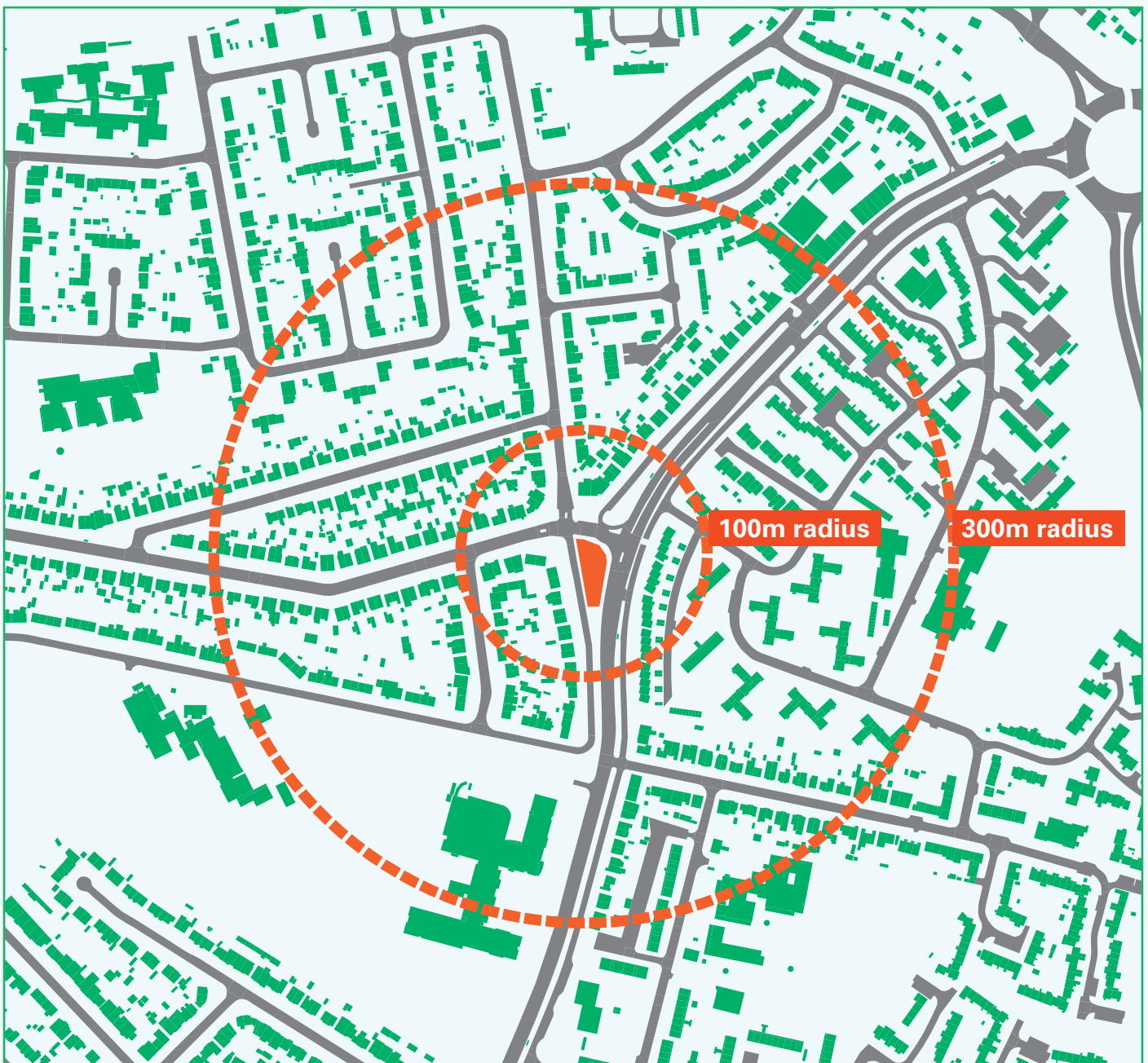
	Neighbourhood or Town Centre	Prevailing Height (storeys)	Contextually High Building (storeys)	Tall Building London Plan Policy D9 (storeys / metres)
North West	Pinner	2	≥ 4	6 / 18m
	Pinner Town Centre	3	≥ 6	6 / 18m
	Pinner Green	2	≥ 4	6 / 18m
	Hatch End	2	≥ 4	6 / 18m
	Hatch End Town Centre	2	≥ 4	6 /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

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

## Determining prevailing height for a site's context

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

Figure 2C



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



## Establishing context

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

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

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

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

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

Figure 2D



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

## Flow chart for assessing context

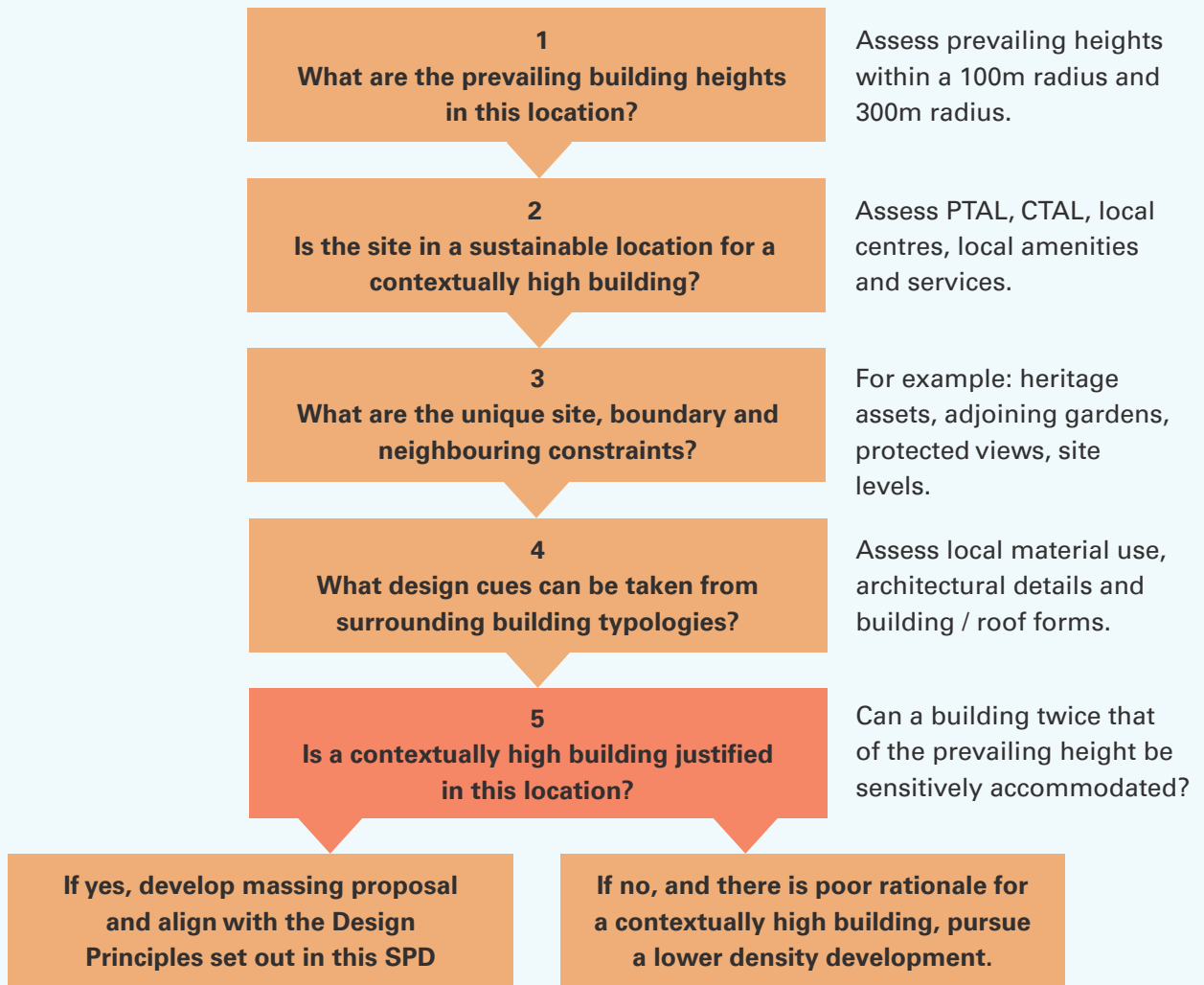


Figure 2E

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

and what would constitute a contextually high building.

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

## Example 1: Suburban Residential Context

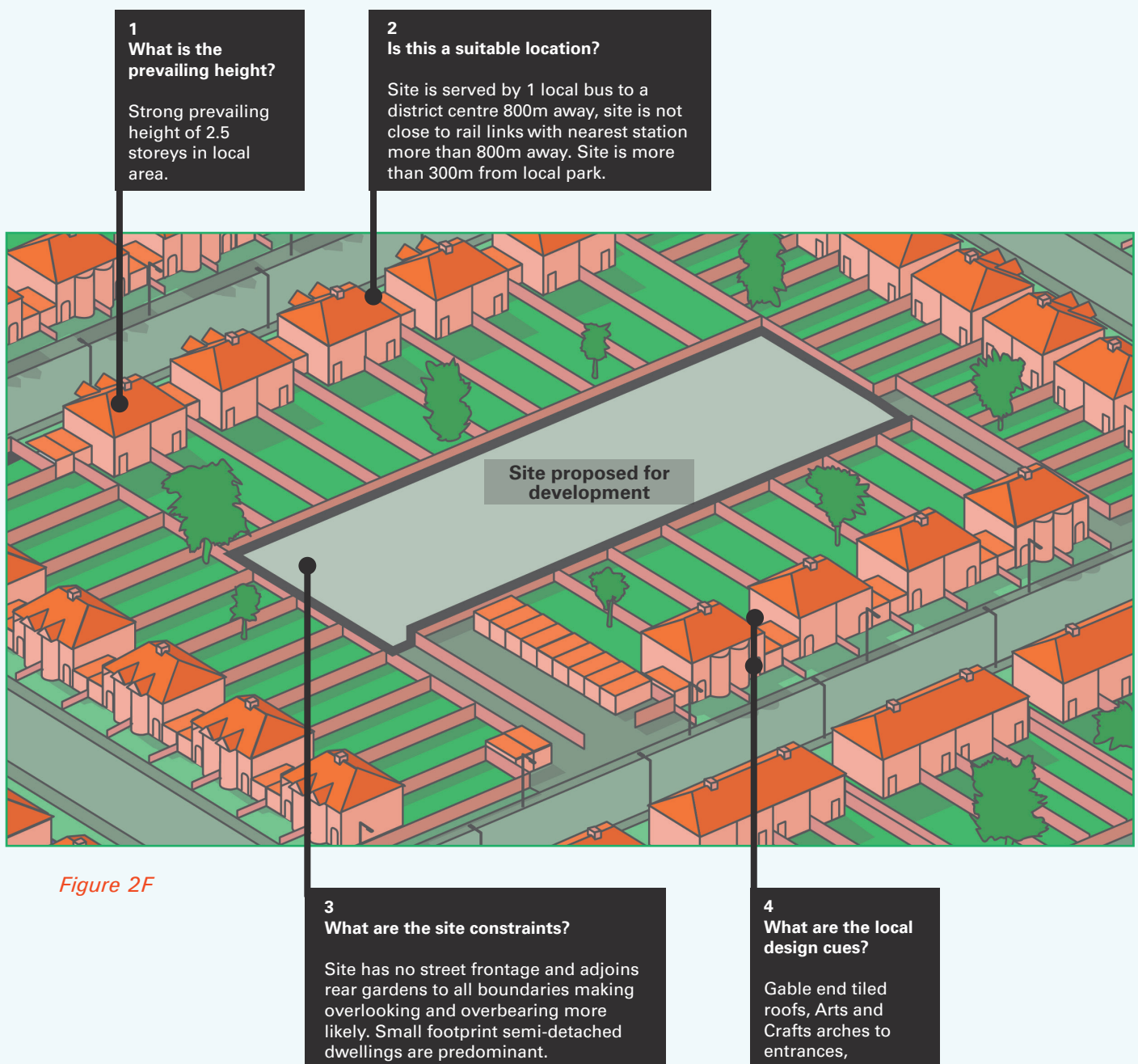


Figure 2F



## Example 2: Suburban Neighbourhood Parade

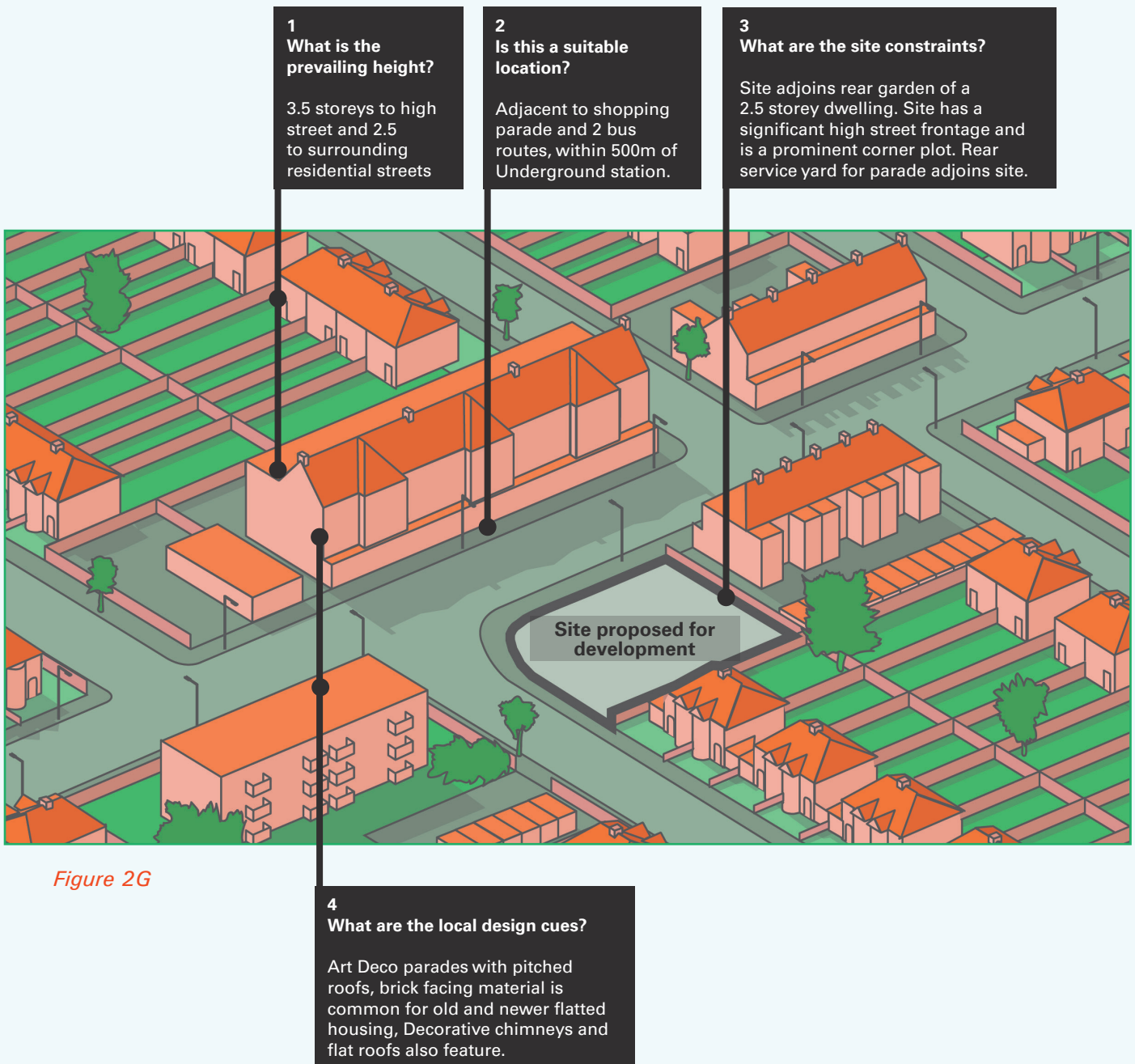


Figure 2G

### Example 3: Suburban District / Local Centre

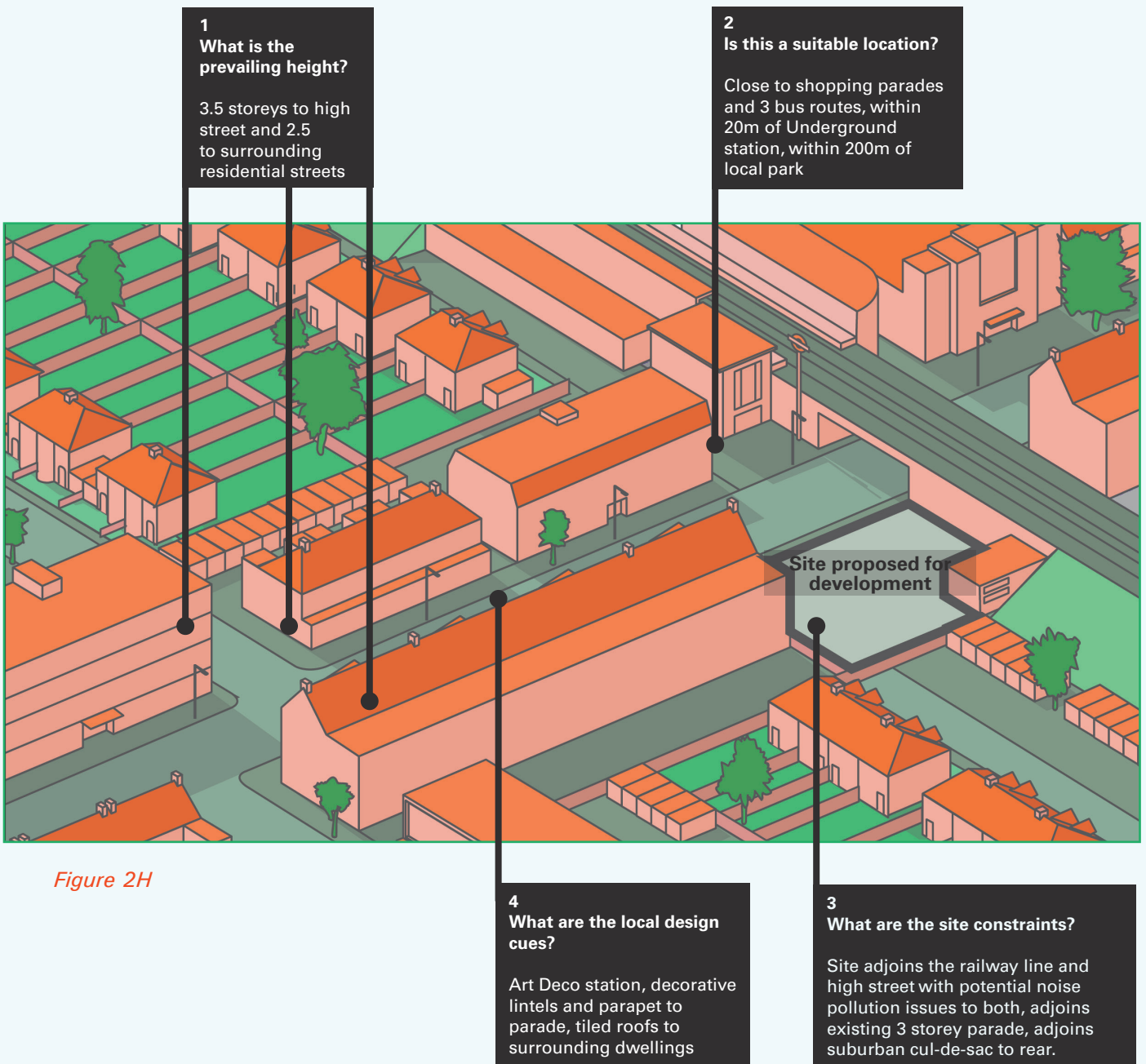


Figure 2H

## Example 4: Suburban Mixed Character

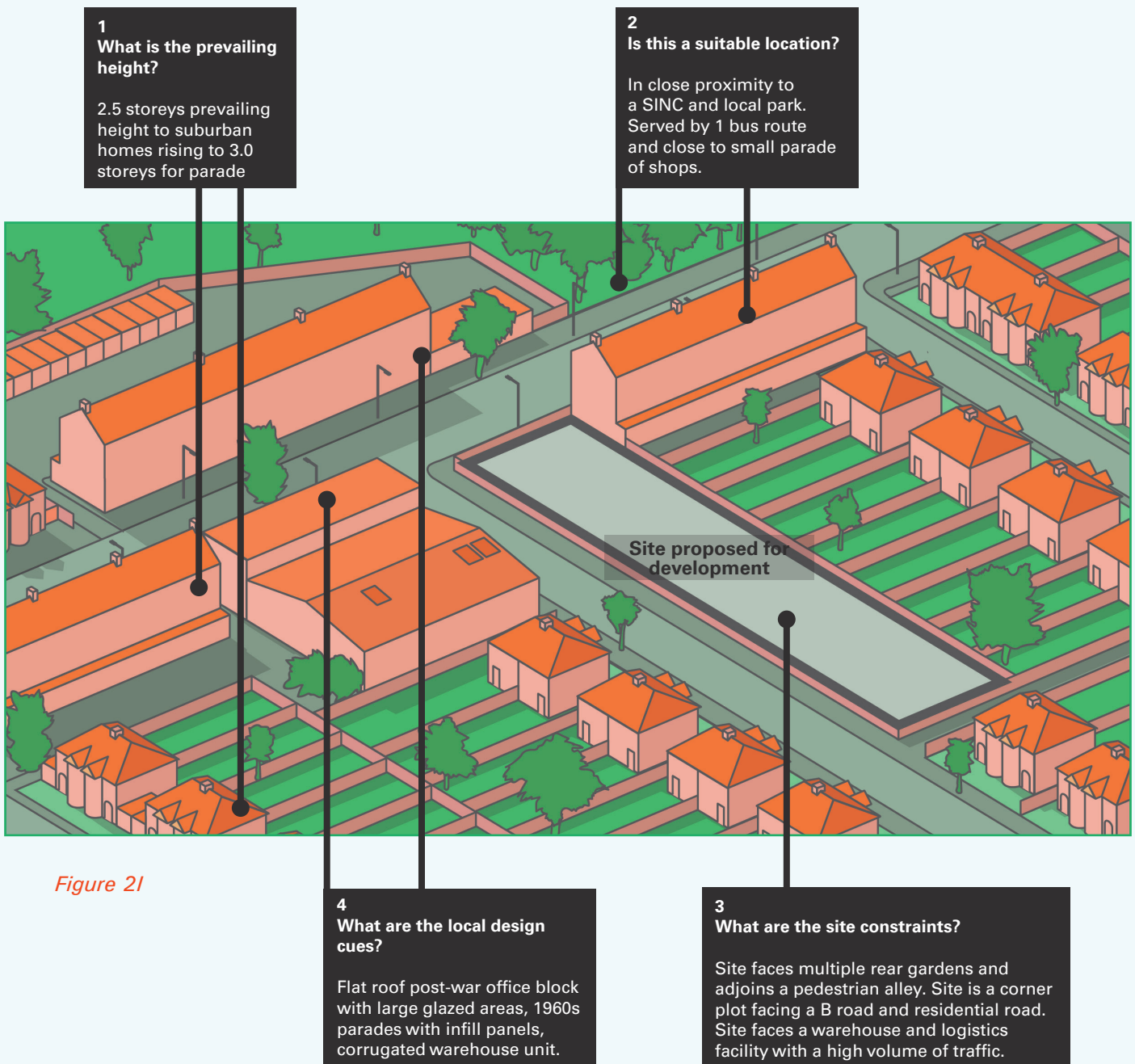


Figure 21

# What is a tall building?

## 2.4

### The London Plan definition of tall

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

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

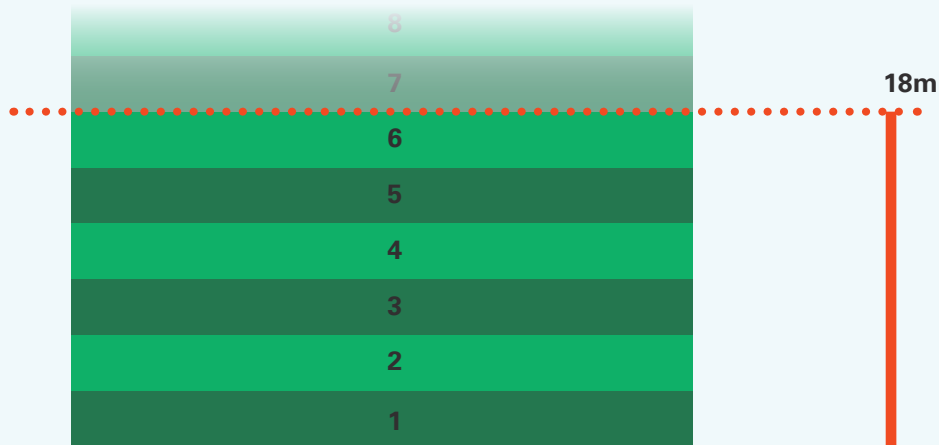


Figure 2J

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

# What is a contextually high building?

## 2.5

### LB Harrow's definition of contextually high

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

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

CH = Contextually High  
P = Prevailing height

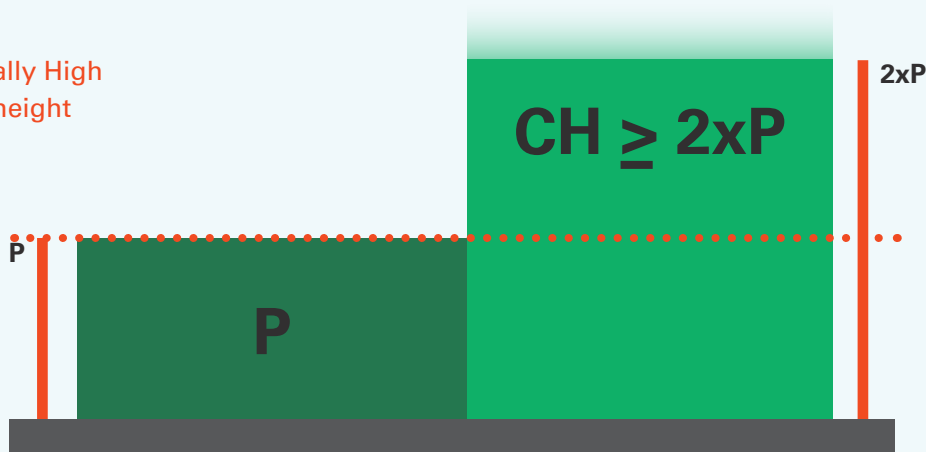


Figure 2K

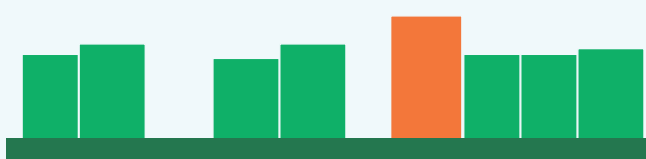
Formula to define contextually high height within a given area

## What does a contextually high building look like?

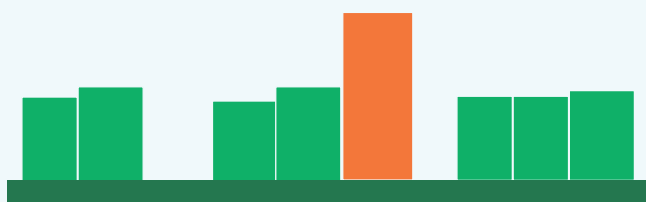
2.5.3 A contextually high building is taller than the prevailing heights of its local context and has the potential to cause a significant visual impact on the skyline.



Proposed building is 1x prevailing height (P)



Proposed building is 1.5x prevailing height (P)



Proposed building is 2x prevailing height (P)

Figure 2L

## Upward extensions under permitted development

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

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

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

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

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

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

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

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

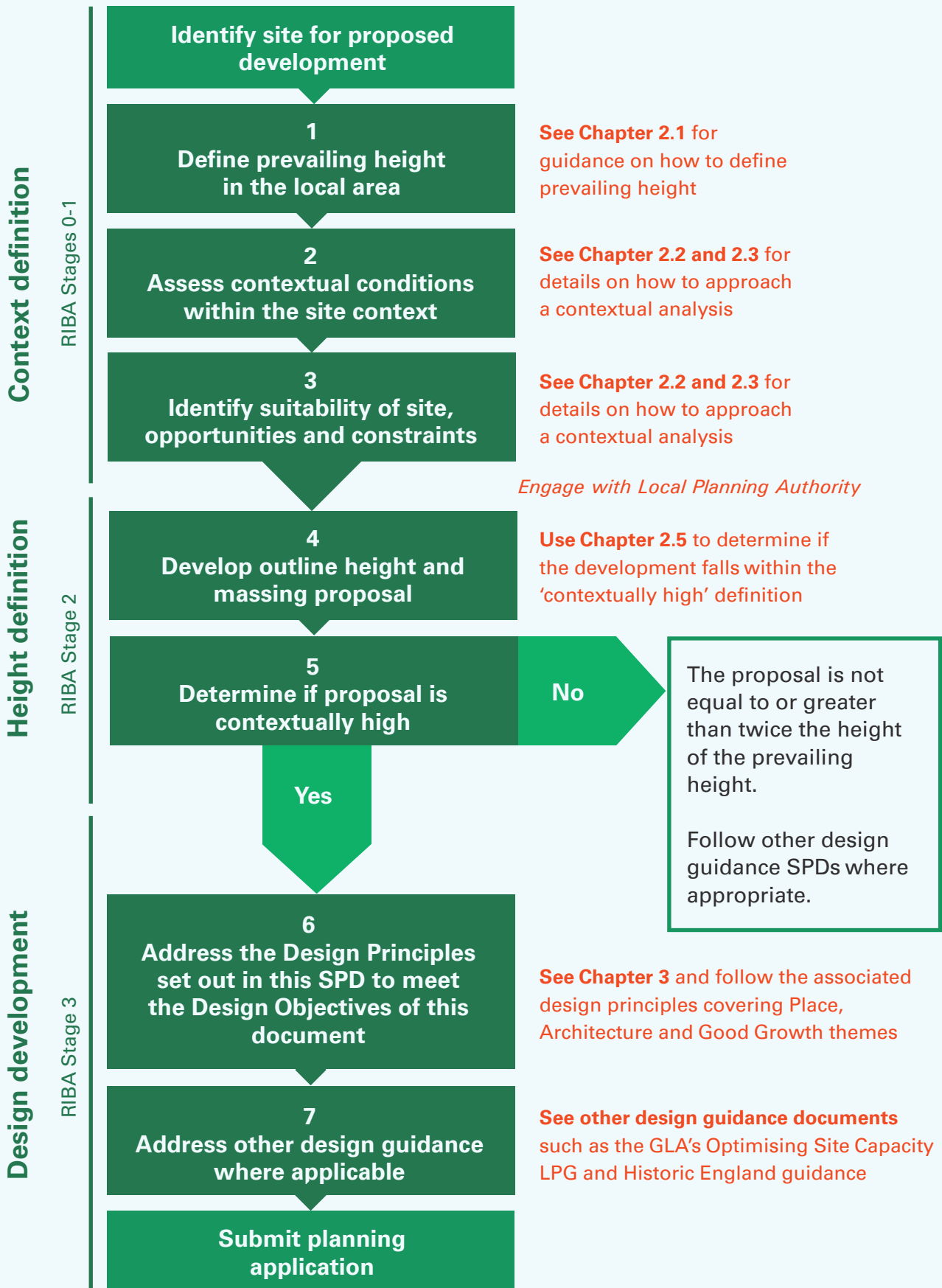


Figure 2M



## Summary

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

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

3.0

# Design Objectives and Principles



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

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

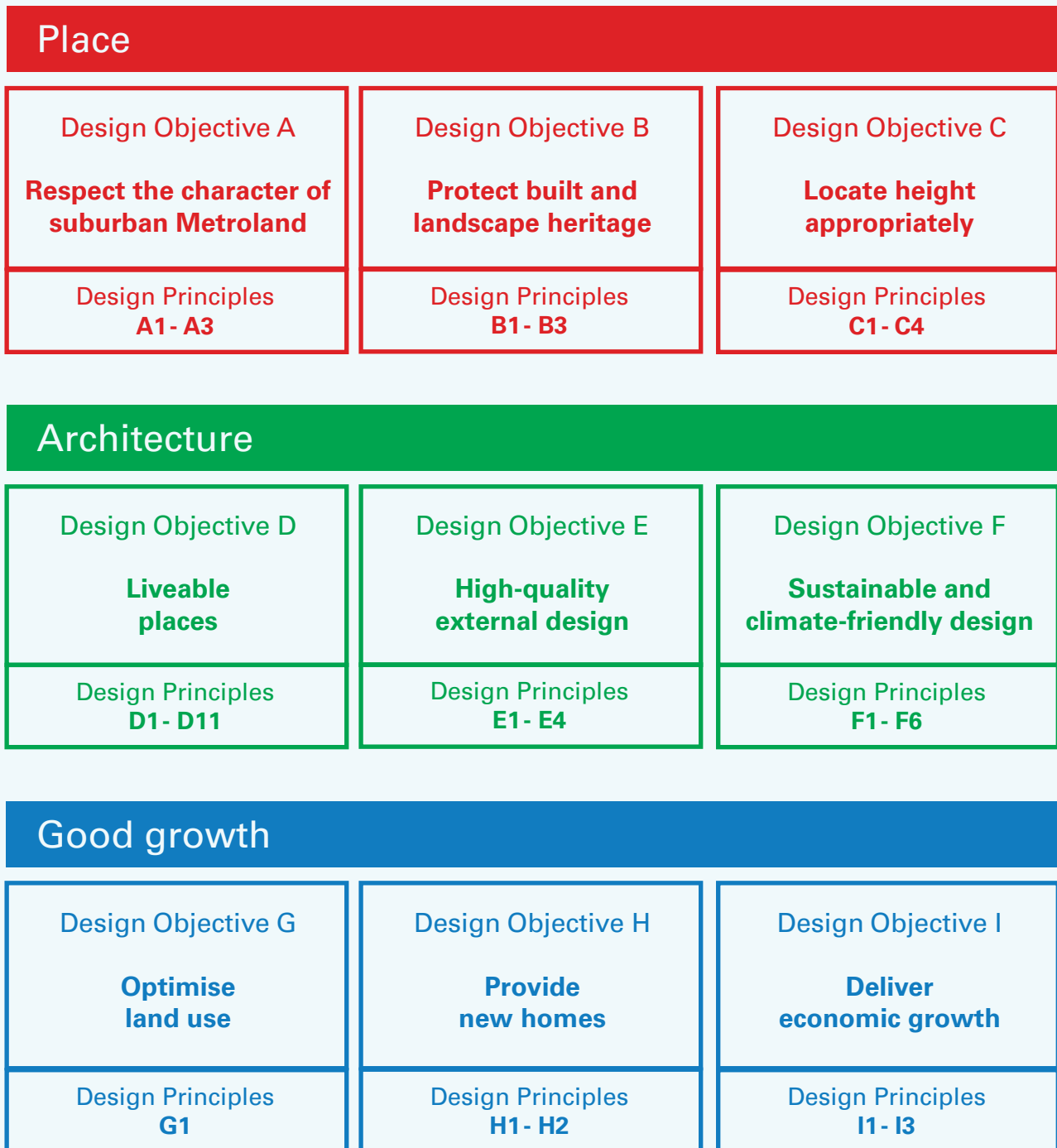


Figure 3A

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

*Figure 3B*



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

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

Figure 3C



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

Figure 3D



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



## Development relates to the existing pattern of suburban development

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

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

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

Figure 3E



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

Figure 3F



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



## Increased height is proportional to local prevailing heights

- 3.3.10 Proposed massing has the potential to cause harm to the character of suburban areas when there is a significant difference between the proposed height and prevailing heights.
- 3.3.11 Proposed building height must respect existing (and consented) prevailing heights within their context. Defining contextually appropriate will depend on an assessment of prevailing heights and the character and built grain of an area. For example, an area with varying building heights may be able to accommodate greater height than areas which are more uniform in height.
- 3.3.12 Increased height can be achieved sensitively through a gradual increase in height over

prevailing heights. For larger sites in suburban areas, a series of incremental increases in height can create a less-disruptive transition between a low-density context and a higher-density development.

- 3.3.13 Massing at site edges and boundaries must respond to neighbouring heights. Increased height at site edges, specifically in suburban locations, can create overbearing impacts and harm neighbouring amenity.
- 3.3.14 Where proposals meet the definition of a tall building as set out in Policy D9A of the London Plan (2021), applicants must demonstrate compliance with the considerations set out within Policy D9C of the London Plan (2021).

Figure 3G



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

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

Figure 3H



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



## Development responds sensitively to heritage assets

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

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

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

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

Figure 3I



Figure 3J



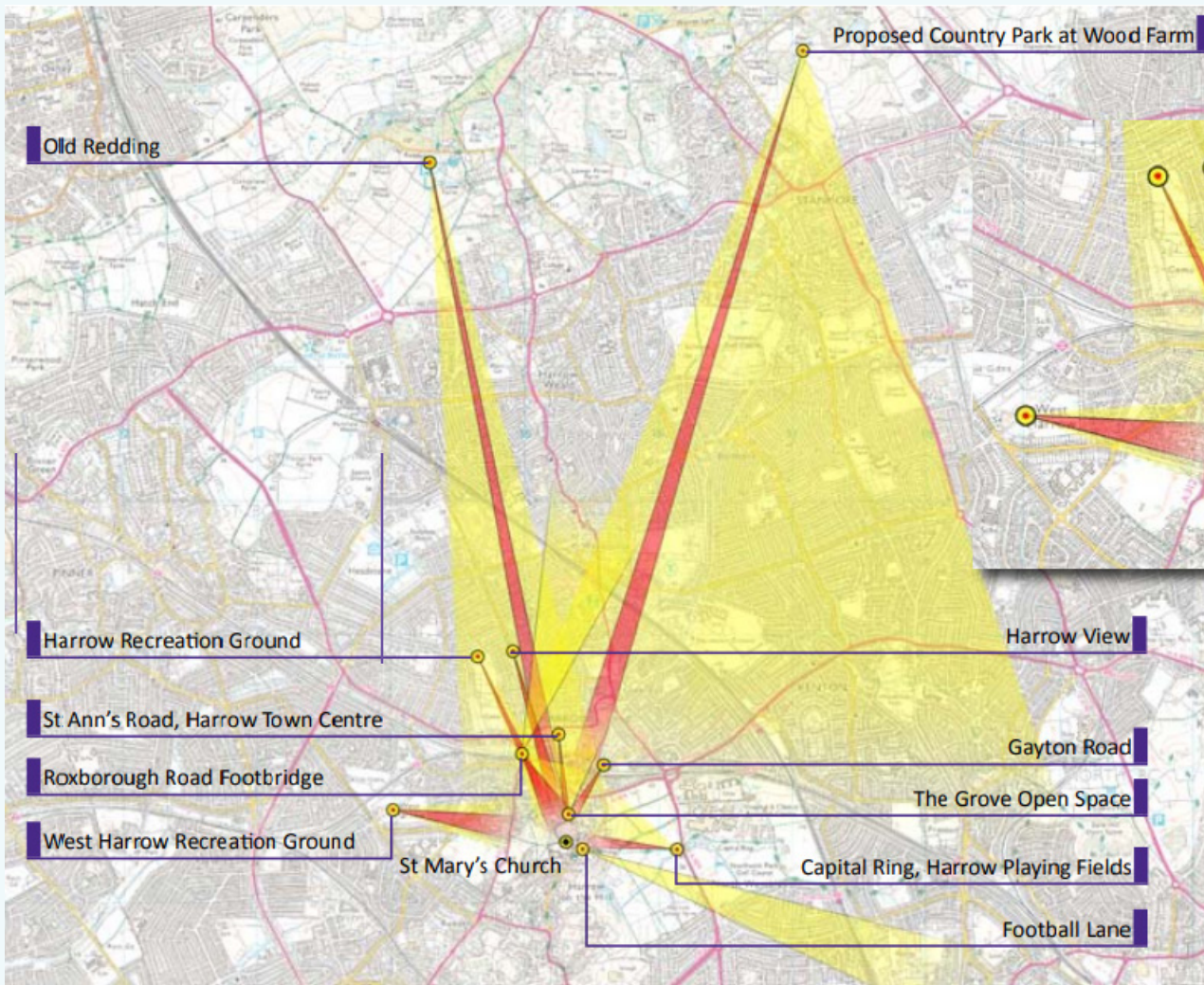
New development can enhance existing heritage assets. New housing at Bentley Priory sensitively responds to the listed buildings and Registered Park and Garden at the site through appropriate scale, sensitive and referential material choice and neoclassical-inspired elevations. This allows for the addition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

## Development responds sensitively to protected views

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

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

Figure 3K



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



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

3.4.7 Harrow has a verdant character with a rich network of open spaces. Reflecting its location at the upper reaches of the London basin, there is a general rise in levels from south to north, with a number of notable topographical features across the borough.

3.4.8 Buildings located next to publicly accessible open space (regardless of its designation) can

have a detrimental impact on the quality and use of that space by local people.

3.4.9 Because of this, new development should not impede local street or parkland views and vistas, and should protect the open quality and amenity of parks, the Green Belt, Metropolitan Open Land and other Public Open Spaces.

Figure 3L



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

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

Figure 3M



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



## Sustainable locations

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

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

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

Figure 3N



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

## Design Principle C2

### Prominence and townscape impact

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

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

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

## Wayfinding and legibility

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

legibility of the street pattern for pedestrians.

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

Figure 30



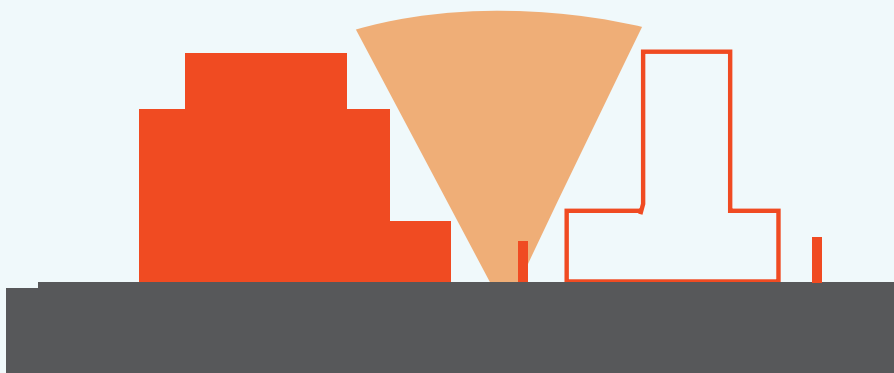
Stanmore Place features well-delineated front elevations to residential blocks and clear areas for pedestrians and vehicles within the street scene. Lighting and a lots of habitable room windows facing the street create a feeling of safety and the street width and distances create a spacious but domestic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

## Orientation and neighbouring sites

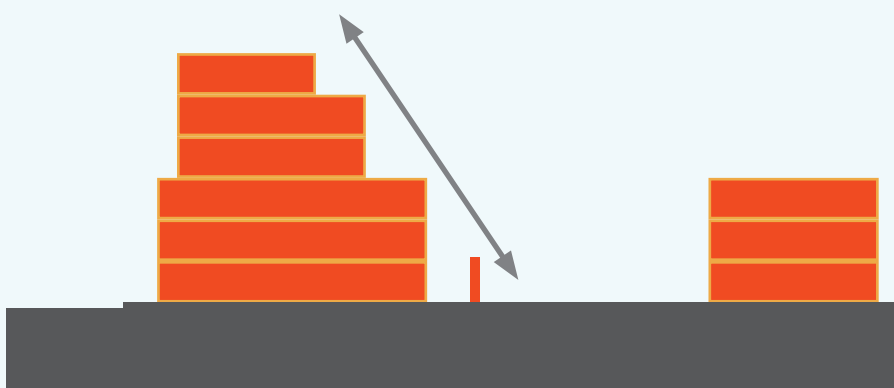
- 3.5.11 Proposals have the potential to cause harm to adjoining properties due to poor siting of massing and window openings.
- 3.5.12 Height and massing must be located with regard to the proximity and outlook of neighbouring buildings, minimising harm caused through overbearing and loss of light and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

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

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



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



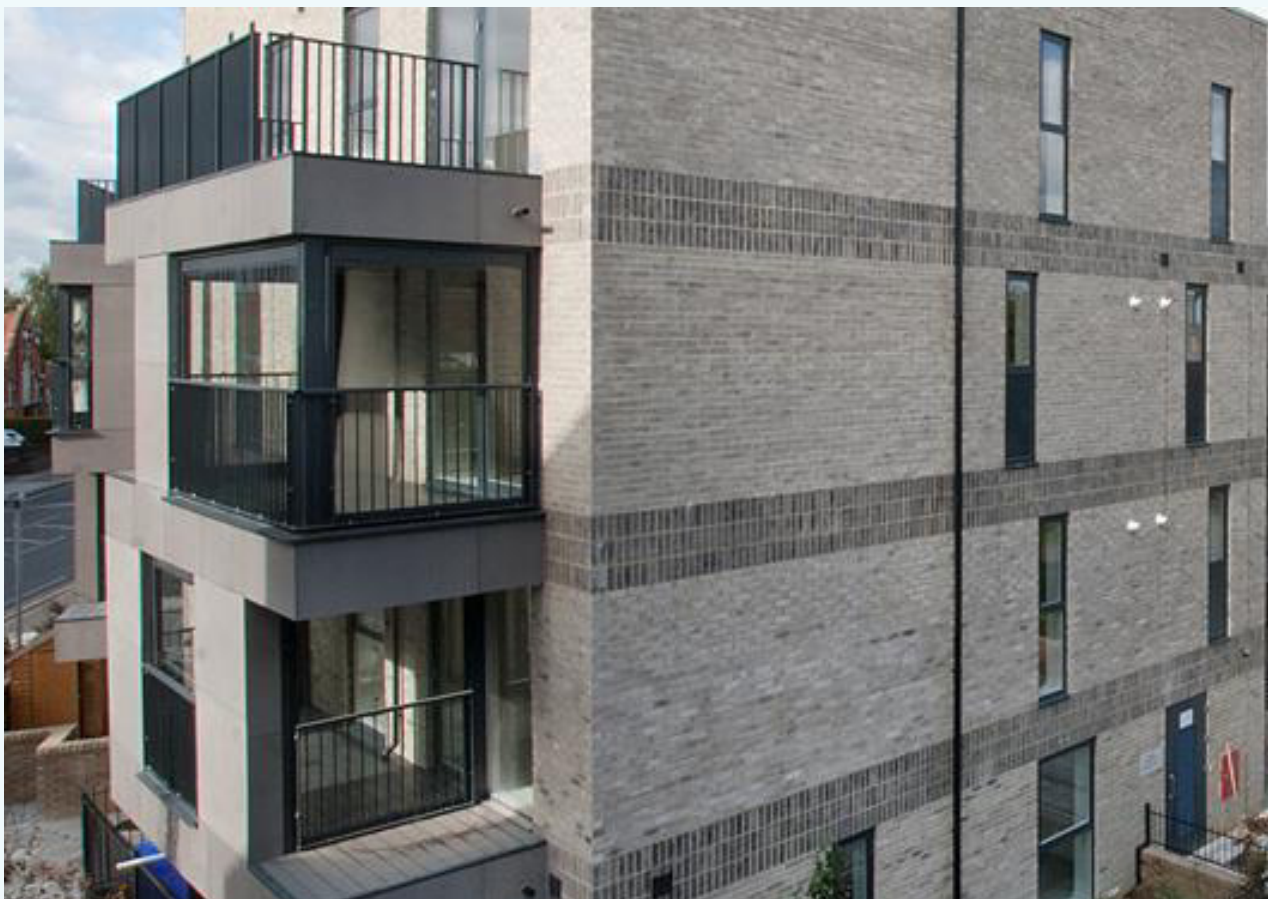
Height is positioned to respect views from habitable room windows of neighbouring buildings and massing is stepped back from boundary lines to reduce overbearing.

Figure 3P



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

*Figure 30*



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

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

*Figure 3R*



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



## Human scale at ground floor level

- 3.7.2 Proposals can appear imposing to pedestrians and the design of the ground floor element is critical in ensuring that taller elements integrate with pedestrian use.
- 3.7.3 Ground floor frontages and entrance features should not be overly dominant or overbearing within the street scene and should respond to ground floor massing and architectural

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

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

Figure 3S



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



## Overbearing and overlooking

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

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

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

Figure 3T



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

## Public realm

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

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

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

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

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

Figure 3U



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

## Residential amenity

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



Figure 3V



Figure 3W



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

### Transport and parking

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

## Design Principle D6

### Servicing and waste collection

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

## Design Principle D7

### Designing out crime

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

## Design Principle D8

### Daylight and overshadowing

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



## Solar gain

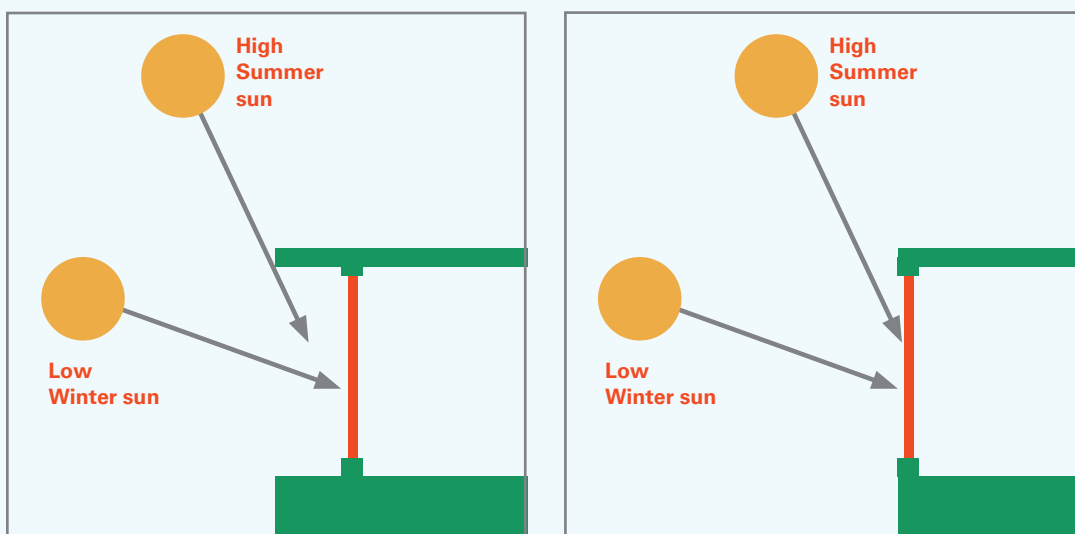
3.7.38 Large amounts of glazing can lead to high levels of heat loss in winter and solar gain in summer - both of which result in additional energy consumption and poor thermal comfort. Glazed areas should be designed to limit space heating demand and peak solar gain while ensuring high daylight levels.

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

Figure 3X



Figure 3Y



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

## Air, noise and microclimate

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

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

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

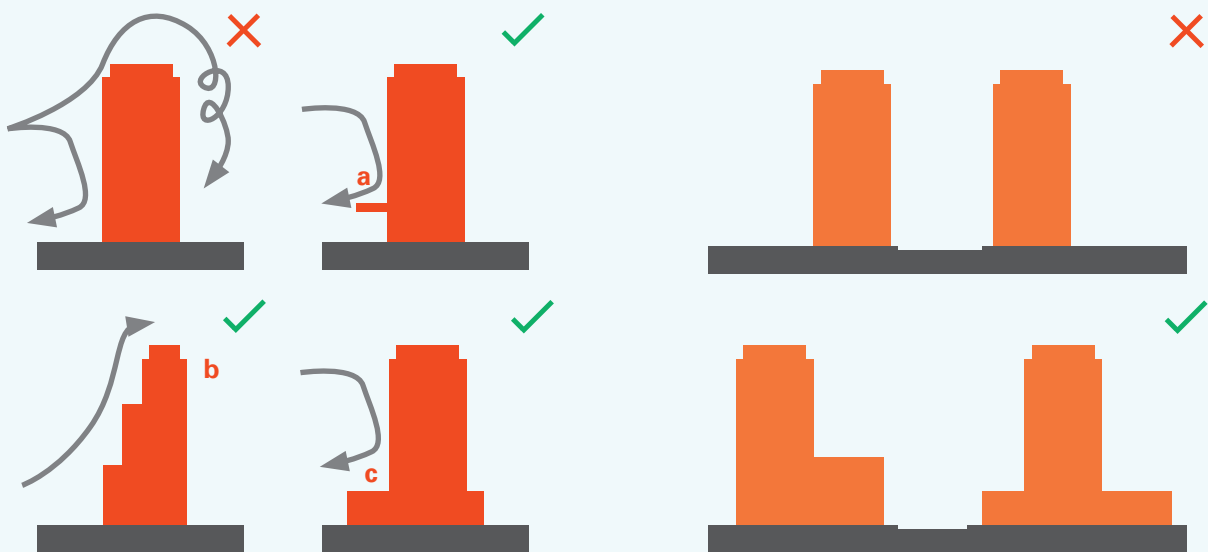
**3.7.43 Noise:** Proposals should consider the potential noise levels created by air movement, building use or operational machinery to maximise the enjoyment of internal and open spaces in

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

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

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

Figure 3Z



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

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



## Greening

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

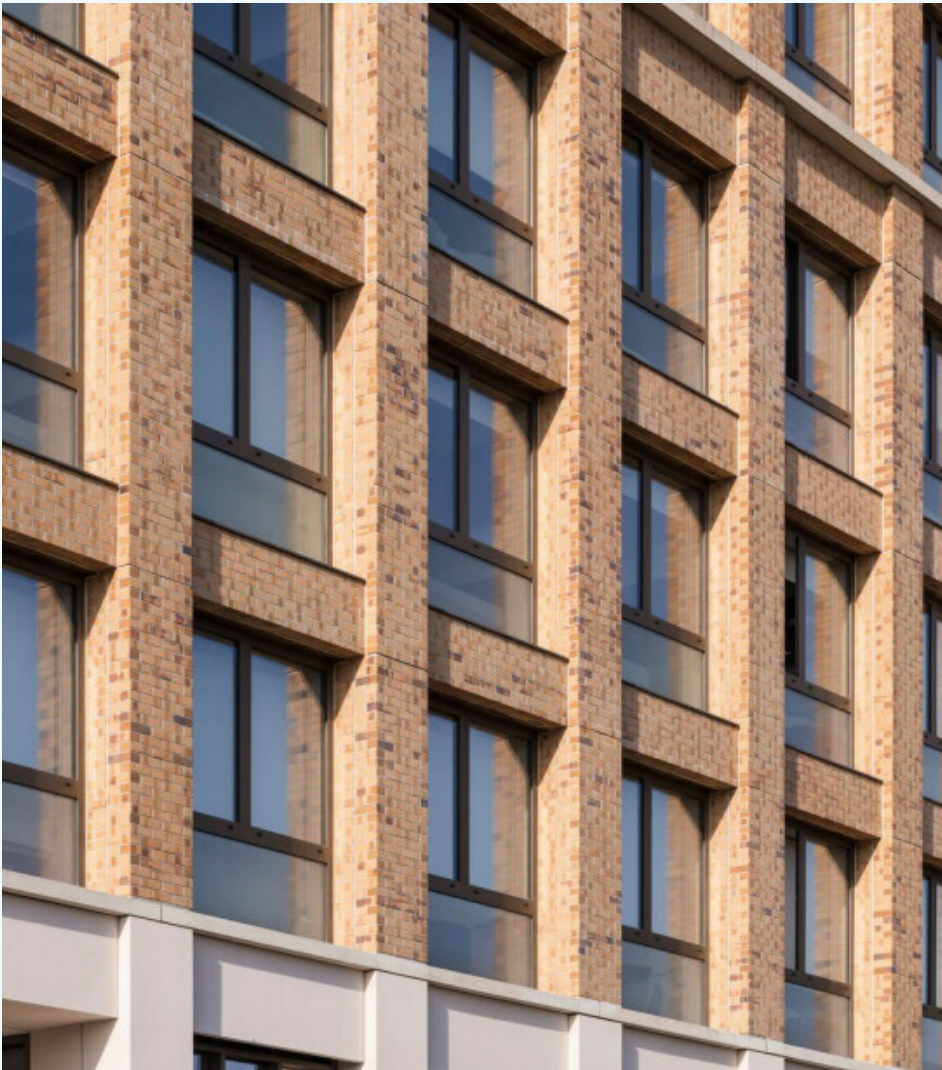
Figure 3AA



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

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

*Figure 3AB*



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



## Form and composition

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

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

Figure 3AC



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

## Top

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

## Middle

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

## Base

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

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

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

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

## Mediating massing

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

*Figure 3AD*



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



## Elevation treatment

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

### Visual interest

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

### Layering

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

elements could differ by material or setback

### Harmonious fenestration

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

### Relationship to internal uses

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

### Evolving existing typologies

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

*Figure 3AE*



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

## Materials and detailing

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

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

Figure 3AF

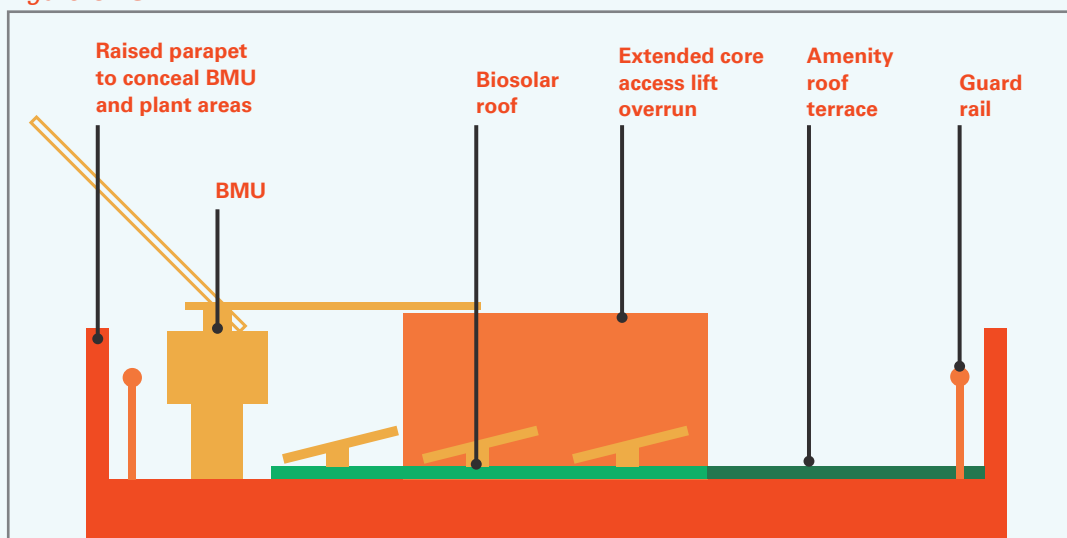


Materials should be specified which are robust, hard-wearing and age well. Brick, stone and other natural materials are typically more appropriate than composite materials. Light-coloured render should be avoided due its likeliness to stain and spall.

### Roofscapes

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

Figure 3AG



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

## Design Principle E5

### Active ground floor frontage

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



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

*Figure 3AH*



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



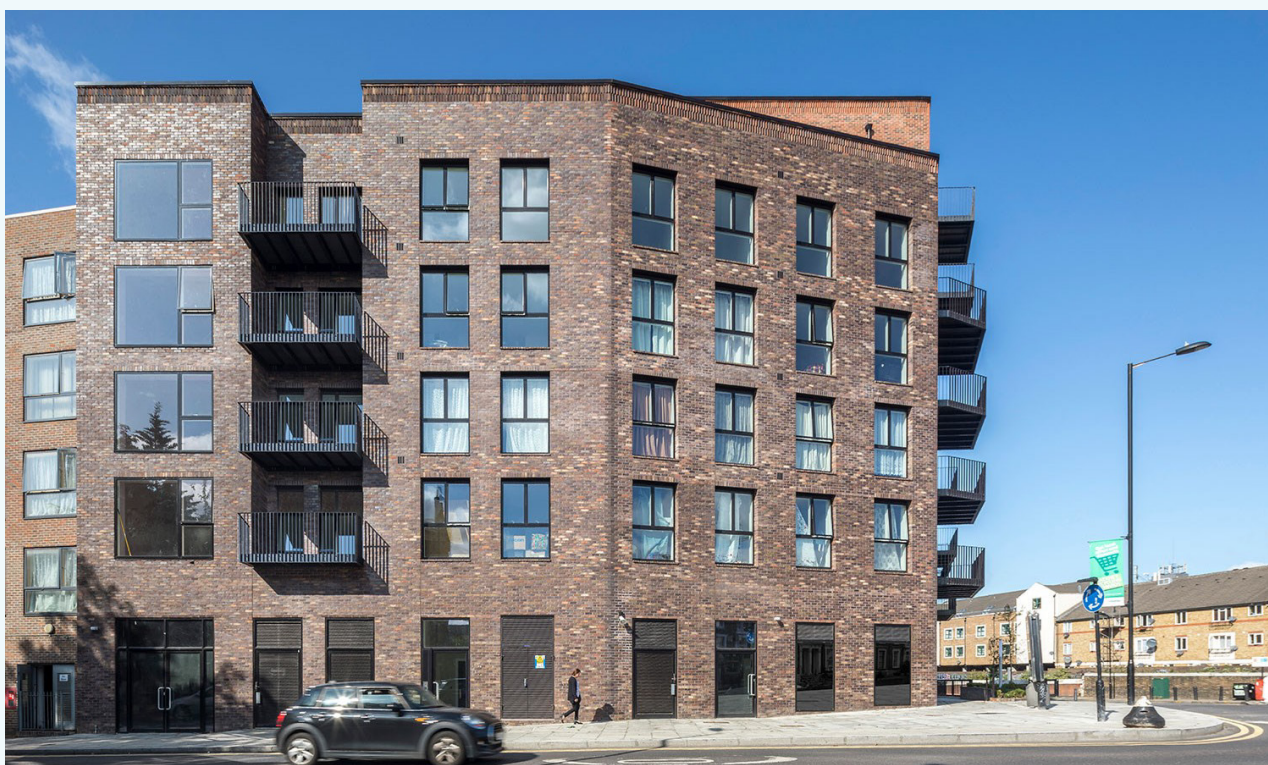
## Sustainable construction

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

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

reduce reinforced concrete construction where possible and practicable.

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



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

### Passive design

- 3.9.5 Proposals are encouraged to adopt Passivhaus design principles to ensure that a fabric-first approach is maximised.
- 3.9.6 Junctions and thermal bridging must be minimised and a high overall U-value achieved. Air tightness, insulation and triple glazing can all ensure that a fabric-first approach is achieved, reducing demand on heating and cooling.
- 3.9.7 Proposals should ensure that key junctions in the building envelope such as wall to floor connections, window head/sill/jamb and balcony connections are of a high standard and are airtight to ensure minimal thermal loss."



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

## Design Principle F3

### Low embodied carbon materials

- 3.9.8 Proposals should seek to use low carbon materials to help reduce development carbon footprint. Materials that use recycled materials, or locally-supplied natural materials will be encouraged to be utilised where appropriate.
- 3.9.9 Site redevelopments which require demolition of existing structures should seek to re-use demolition materials on site where applicable, such as for landscaping.



## Design Principle F4

### Sustainable heating

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

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

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

## Design Principle F5

### Sustainable energy

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

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

## Design Principle F6

### Biodiversity

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

- 3.9.17 Proposals should enhance and increase biodiversity and reinforce local distinctiveness through landscape character and planting mixes.
- 3.9.18 Opportunities to de-culvert streams and include blue infrastructure where applicable to sites will be supported.
- 3.9.19 Proposals that are detrimental to locally important biodiversity will be resisted.

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

3.10.2 Good Growth is based on the following six objectives:

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

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

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

## Design Principle G1

### Effective but sensitive use of sites

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

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

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

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

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

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

## Design Principle H1

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

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

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

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

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

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

## Design Principle H2

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

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

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

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

3.12.7 Proposals should seek to deliver a mix of

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

## Design Principle I1

### Mixed use development

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

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

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

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

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

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



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

### Ground floor employment use

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

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

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

## Design Principle 13

### Social and cultural life

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

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



4.0

# Application Process and Requirements

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

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

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

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

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

## Supporting assessments for tall or contextually high building proposals

### Microclimate assessment

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

### 3D Visual Modelling

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

### Air Quality Assessment

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

### Servicing Strategy

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

### Design & Access Statement

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

### **Planning Statement**

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

### **Vacancy Strategy**

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

### **Daylight & Sunlight Assessment**

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

### **Protected Views Assessment**

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

### **Fire Safety**

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

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

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

## Planning Performance Agreement (PPA)

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

## Pre-Application Service

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

## Design Review Panel (DRP)

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

## Planning Policy Advisory Panel (PPAP)

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

## RAF Northolt

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



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# **Planning Policy Advisory Panel**

## **Minutes**

### **13 July 2023**

**Present:**

**Chair:** Councillor Marilyn Ashton

**Councillors:** Christopher Baxter                      Paul Osborn  
                                 Stephen Greek                                      Varsha Parmar  
                                 Graham Henson                                      David Perry

**Apologies received:** Zak Wagman  
                                 Nitin Parekh  
                                 Asif Hussain

### **Recommended Items**

## 9. Tall Buildings (Building Heights) Supplementary Planning Document

The Panel received a report on Tall Buildings ('Building Heights') Supplementary Planning Document (SPD) – for consideration of consultation responses and proposed amendments, and recommendation for Cabinet to adopt.

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

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

The Panel discussed the report, and consequently, unanimously recommended it to Cabinet for adoption.

### **RESOLVED: To RECOMMEND** (To Cabinet):

- a) notes the contents of the report, and the consultation feedback with responses (Appendix 1);
- b) notes the amended draft SPD which was considered to address the consultation responses where appropriate (Appendix 2); and
- c) provides comments / feedback in relation to the information set out in the report and associated draft SPD (Appendix 2) (to inform any revisions prior to the draft being submitted to Cabinet for consideration and agreement to adopt) and commend the draft SPD as a final document to Cabinet for adoption.

### **Reason For Recommendation**

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

### **Options Considered**

- 1) An alternative option considered is to not amend the SPD to reflect the consultation undertaken and the corresponding responses. Whilst not all consultation responses are able to be included as amendments as they are not all appropriate / would not improve the application of the SPD, failing to amend the SPD where appropriate would result in a less robust document. Not including appropriate amendments to the SPD from the consultation process is not considered an appropriate option.
- 2) An alternative option to the adoption of an SPD which is to do nothing (i.e. not to adopt the amended SPD). If the 'do-nothing' option was pursued Council officers, the Planning Committee and in certain cases, Planning Inspectors, would continue to exercise judgement when making decisions on specific proposals that developers put forward, but without the guidance the



SPD would provide. However, such an approach without this overall agreed guidance for determining contextually tall buildings and associated guidance, will lessen the tools available to the Council to resist developments that are contextually inappropriate within suburban Harrow.

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

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**Report for: Cabinet**

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<b>Date of Meeting:</b>	27 July 2023
<b>Subject:</b>	Updated Statement of Community Involvement (SCI)
<b>Key Decision:</b>	Yes – applies to all wards
<b>Responsible Officer:</b>	Dipti Patel - Corporate Director, Place
<b>Portfolio Holder:</b>	Councillor Marilyn Ashton - Deputy Leader of the Council and Portfolio Holder for Planning and Regeneration
<b>Exempt:</b>	No
<b>Decision subject to Call-in:</b>	No
<b>Wards affected:</b>	All Wards
<b>Enclosures:</b>	Appendix A – Updated Statement of Community Involvement Equalities Impact Assessment Recommendation from the Planning Policy Advisory Panel (13 July 2023)

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

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

### **Recommendations:**

Cabinet is requested to:

- 1) Note and comment on the draft SCI and proposed changes;
- 2) Agree to a 21-day period of public consultation on the updated Statement of Community Involvement (SCI) and delegate to the Chief Planning Officer (in consultation with the Portfolio Holder for Planning and Regeneration) authority to undertake this consultation;
- 3) Agree that following the conclusion of the public consultation, it is proposed that subject to minor changes, the Chief Planning Officer in consultation with the Portfolio Holder, be authorised to make any changes considered appropriate and to formally adopt the document.

### **Reason (for recommendations):**

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

## **Section 2 – Report**

### **1. Introduction**

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

### **2. Options considered**

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

### **3. Background**

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

## **4. Why a change is needed**

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

## **5. Process considerations**

- 5.1 As noted above, the Council intends to have the new Local Plan adopted by December 2025, as reflected in the Local Development Scheme (that sets out the key milestones for the Plan). The report to PPAP/Cabinet on the LDS identified this as a challenging timeframe. In this context, options for making the timeframes as efficient as possible are under constant consideration.
- 5.2 In relation to the proposed minor changes to the SCI, consideration has been given to whether it is necessary or beneficial to consult on these. While consultation on the SCI is typically considered good practice, it is not explicitly required in planning guidance ('There is no requirement for local planning authorities to consult when reviewing and updating their

Statement of Community Involvement.’ Plan Making Guidance Paragraph: 035 Reference ID: 61-035- 20190723). As noted in above, the proposed changes are considered modest in their nature.

- 5.3 Further consideration is that the revised SCI reflects minimum standards for consultation (consistent with legislation) and options to go beyond that. There is nothing stopping the Council from exceeding the requirements of the SCI.
- 5.4 The SCI was presented to the Planning Policy Advisory Panel at their meeting on the 13<sup>th</sup> July 2023 (see background papers), where the Panel agreed that the changes were minor in nature and that it was acceptable to adopt at Cabinet without public consultation, subject to counsel advice.
- 5.5 Upon further consideration of this matter, notwithstanding that there is no formal need to consult on the draft SCI, it is recommended that a 21-day consultation be undertaken to ensure that the community is able to view and have their say on the minor changes to the document. It is proposed that this consultation run from 31 July – 20 August 2023 through the council’s My Harrow Talk platform.
- 5.6 Following the conclusion of the consultation, it is proposed that subject to minor changes, the Chief Planning Officer in consultation with the Portfolio Holder be authorised to formally adopt the document. through the agreed process (delegated authority or Cabinet meeting).

## **6. Ward Councillors’ comments**

- 6.1 None as the updated SCI covers all wards.

## **7. Risk Management Implications**

Risks included on corporate or directorate risk register? **Yes**

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

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

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

Risk Description	Mitigations	RAG Status
<p>If the recommendation(s) are not agreed, Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012 would not be facilitated and residents would not be notified that LBH is preparing a new Harrow Local Plan and that this is imminent</p>	<ul style="list-style-type: none"> <li>▪ Acceptance of the proposed recommendations in this report will mitigate risk</li> </ul>	<b>GREEN</b>
<p>If the recommendation(s) are not agreed, the current SCI will continue to remain out-of-date and not updated for some 10 years</p>	<ul style="list-style-type: none"> <li>▪ Acceptance of the proposed recommendations in this report will mitigate risk</li> </ul>	<b>GREEN</b>
<p>Harrow residents, businesses and other stakeholders are not being offered an opportunity to have their say on how they are engaged and informed on LBH planning processes lessening engagement and collaboration with them on planning decisions</p>	<ul style="list-style-type: none"> <li>▪ Public consultation on the SCI is not compulsory or specifically required by law</li> <li>▪ The revised SCI reflects minimum standards for consultation which are consistent/compliant with relevant legislation and also incorporates options for engagement and collaboration that can be flexed to go beyond this level of consultation if required</li> </ul>	<b>GREEN</b>
<p>The consultation arrangements set out in the SCI are not fit-for-purpose.</p>	<ul style="list-style-type: none"> <li>▪ The revised SCI reflects an evolution of the current SCI and has been updated to reflect current statutory requirements.</li> <li>▪ The revised document has been reviewed by internal stakeholders (Development Management and Communications colleagues) and cross-checked with corporate consultation standards</li> </ul>	<b>GREEN</b>



<b>Risk Description</b>	<b>Mitigations</b>	<b>RAG Status</b>
The SCI is challenged due to a lack of consultation.	<ul style="list-style-type: none"> <li>▪ Undertake a 21-day consultation on the draft SCI.</li> <li>▪ There is no requirement in legislation for local planning authorities to consult, but it is good practice to inform the public of updates to the SCI and of the changes that have been made.</li> </ul>	<b>GREEN</b>
The SCI is not endorsed for adoption by cabinet, causing delay to the Local Plan program set out in the Local Development Scheme (LDS).	<ul style="list-style-type: none"> <li>▪ Seek endorsement from the PPAP and progress the SCI for adoption by Cabinet.</li> </ul>	<b>GREEN</b>

## **8. Legal Implications**

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

## **9. Financial Implications**

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

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

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

10.2 An EQIA has been submitted to the Equalities team for sign off.

## **11. Procurement Implications**

11.1 The SCI did not require procurement of any goods or services, therefore no procurement implications are foreseen.

## **Council Priorities**

1. **A council that puts residents first**

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

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

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

**Statutory Officer: Jessie Mann**

Signed on behalf of Chief Financial Officer

**Date: 16/07/2023**

**Statutory Officer: Chileme Hayes**

Signed on behalf of the Monitoring Officer

**Date: 18/07/23**

**Chief Officer: Dipti Patel**

Signed off by the Corporate Director

**Date: 18/07/2023**

**Chief Officer: Viv Evans**

Signed off by the Chief Planning Officer

**Date: 18/07/2023**

**Head of Procurement: Nimesh Mehta**

Signed by the Head of Procurement

**Date: 15/07/2023**

**Head of Internal Audit: Neale Burns**

Signed by the Head of Internal Audit

**Date: 14/07/2023**

**Has the Portfolio Holder(s) been consulted? Yes**

### **Mandatory Checks**

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

**EqlA carried out: Yes**

This is an update of an existing statutory document which provides context and options for all planning consultations.  
An additional full Integrated Impact Assessment (IIA) will be carried out covering the Local Plan suite at examination.

**EqIA cleared by: Jennifer Rock (11/07/2023)**

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

**Contact:** Viv Evans, Chief Planning Officer, [Viv.Evans@harrow.gov.uk](mailto:Viv.Evans@harrow.gov.uk)

### **Background Papers:**

- [SCI Planning Policy Advisory Panel Report and minutes from 13 July 2023 meeting](#)

**Call-in waived by the Chair of Overview and Scrutiny Committee - NO**

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

July 2023

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# 1 Introduction

## 1.1 Background

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

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

## 1.2 What is a Statement of Community Involvement?

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

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

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

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

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

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

## 2 Community Engagement

### Harrow's Communities

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

### The Rights of the Community

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

- a. **Right to know.** Harrow's communities have a right to know if their environment is proposed for change, to know what the Council's planning objectives are for the borough and to know how the Council is performing.
- b. **Right to Explanation.** Harrow's communities have a right to an explanation of the reasons why their environment is proposed for change, the reasoning behind the Council's decision making, and the reasons why it believes its plans are the most appropriate potential change.
- c. **Right to Influence.** Harrow's communities have a right to influence how their environment is proposed to change, to expect the Council to listen to their views before acting, and to expect the Council to consider those views and, where appropriate, improve its plans and decisions accordingly.

### Our Principles of Engagement

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

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



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

### 3 Community Engagement in the Planning Process

#### Community engagement in Harrow

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

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

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

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

#### Levels of Community Engagement

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

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

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

## Digital Technology

### Common Methods of Engagement

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

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

Individuals and Communities can view all new planning applications online and can set up notifications for status updates on a specific application. Signing up to [LDF@harrow.gov.uk](mailto:LDF@harrow.gov.uk) will allow you to set up email notifications for Local Plan news and engagement.

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

## 4 Planning Policy and Plan-Making

### What is Planning Policy?

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

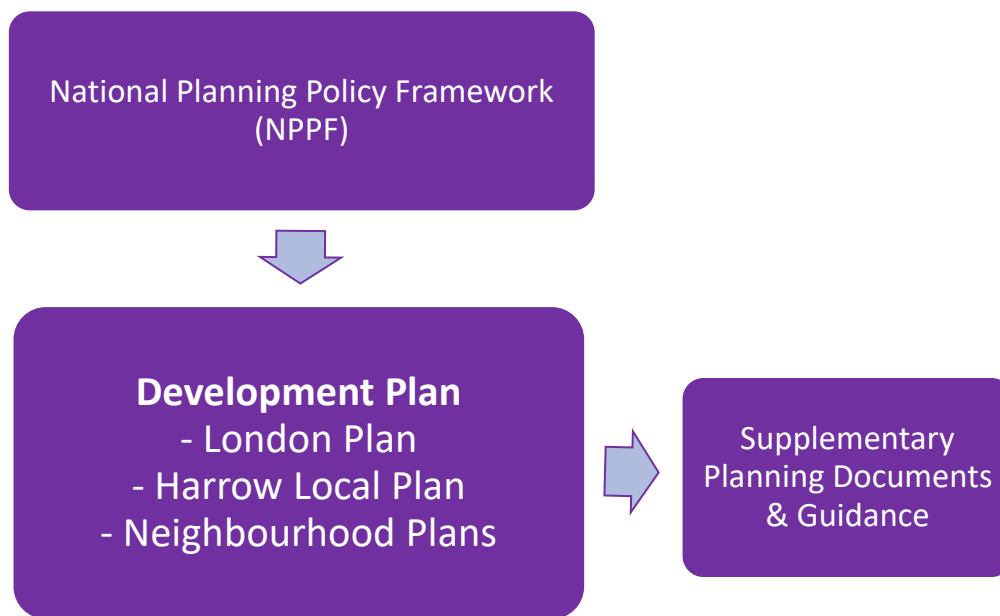
Things can change over time. Changes will occur economically, politically, environmentally and socially and therefore planning policy is always evolving to respond. Policy documents are informed by evidence and are monitored and reviewed regularly by the Council to ensure they remain appropriate and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

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

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

### Development Plan

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



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

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

## 5 The Harrow Local Plan

### What is the Local Plan?

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

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

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

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

### Local Development Scheme

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

### Key Stages of Local Plan Preparation

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

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

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

## 6 Neighbourhood Planning

### What is Neighbourhood Planning?

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

### Forming a Neighbourhood Forum

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

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

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

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

### The role of the Council

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

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

Additional information can be found in Appendix 4.

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

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



## The role of the Forum

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

## Key Stages of Neighbourhood Plan Preparation

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

## 7 Supplementary Planning Documents

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

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

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

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

	consult the named “statutory bodies <sup>5</sup> ” on our (SA/SEA) screening statement and will undertake a full SA/SEA if required.	view alongside the SPD online, and in main Council buildings
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<sup>5</sup> The “statutory bodies” for SEA/SA are Historic England, Natural England and the Environment Agency.

## 8 Development Management

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

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

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

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

### Pre-Application Stage

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

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

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

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

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

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

### Planning Application Stage

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

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

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

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

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

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

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

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

\* Less than 10 homes, including the change of use to flats; less than 1000 m<sup>2</sup> of non-residential floorspace

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



Certificates of Lawfulness	✓	X	X	X
Revisions to applications	<p>Where an application has been amended before a decision is made, we will decide whether further publicity and consultation is necessary. In deciding whether this is necessary we will follow the assessment set out in Planning Practice Guidance which states the following considerations may be relevant:</p> <p>were objections or reservations raised in the original consultation stage substantial and, in the view of the local planning authority, enough to justify further publicity?  are the proposed changes significant?  did earlier views cover the issues raised by the proposed changes?  are the issues raised by the proposed changes likely to be of concern to parties not previously notified?</p> <p>Where it is considered that re-consultation is necessary, the timeframe for responses will be shorter than the initial 21 days, usually 14 days.</p>			

### Decision Making Stage

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

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

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

### Appeal Stage

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

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

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

### **Submitted Planning Applications - Having Your Say**

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

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

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

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

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

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

## **Where We Won't Consult**

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

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

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

### **Planning performance Agreements (PPAs)**

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

## 9 Other Policy Documents

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

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

### Contact Us

6.2 If you have any comments about either Local Plans or Planning Applications, you can do this by contacting us directly. Our details are:

- For Local Plan queries please email [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk)
- For Planning Applications and Pre-Application advice please email [planning.applications@harrow.gov.uk](mailto:planning.applications@harrow.gov.uk)
- Contact us by letter: Planning Services, 1 Forward Dr, Harrow HA3 8NT

### Planning Information

6.3 Excellent sources of information about planning are the Government website, Planning Portal and the Royal Town Planning Institute.

6.4 The Government websites contains National Planning Practice Guidance on a number of planning topics as well as a cross reference to the national planning policy in the form of the National Planning Policy Framework. <https://www.gov.uk/government/collections/planning-practice-guidance>

6.5 The Planning Portal is the Government's online planning and Building Regulations resource for England and Wales. It provides information on plans, appeals, applications, contact details and research areas <http://www.planningportal.gov.uk>

6.6 The Royal Town Planning Institute (RTPI) aims to advance the science and art of planning for the benefit of the public, and contains many useful guidance notes <http://www.rtpi.org.uk>

# Appendices

## Appendix 1 – Methods of Community Engagement

### **Methods Explained**

#### *Public Roadshows*

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

#### *Focus Groups*

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

#### *Community Surveys/Questionnaires*

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

#### *Public Exhibitions*

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

#### *Media Coverage/Briefings*

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

#### *Summary Information*

To ensure that the whole community is informed at key stages of the plan's preparation, the Council will publish and distribute, in both electronic and paper form, newsletters that will explain the Local Plan process and set out progress in the preparation of Local Plan

documents. Articles will be placed in the local press and the Council's own magazine (Harrow People).

## Appendix 2 – Potential methods for Community Engagement (Local Plans)

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



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

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

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

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

### Appendix 3 – Categories of Planning Applications

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

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

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

### General support:

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

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

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

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

### PLEASE NOTE:

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

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

The requirement under the Act for Local Planning Authorities to provide advice and support should not be construed as an obligation for the Authority to agree with proposals made by the

neighbourhood forum. Where the Local Planning Authority is required to make a formal decision (i.e. determining applications to designate a neighbourhood area or forum, or determining legal compliance prior to publishing a draft plan etc), the Council will have regard to the relevant legislative requirements and the National Planning Policy Framework / National Planning Practice Guidance.

## Appendix 5: Statutory and Non-statutory Consultees

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

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

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

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

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



**You will need to produce an Equality Impact Assessment (EqIA) if:**

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

Guidance notes on how to complete an EqIA and sign off process are available on the Hub under Equality and Diversity. You must read the [guidance notes](#) and ensure you have followed all stages of the EqIA approval process (outlined in appendix 1). Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: [Equality Impact Assessment](#) - sources of statistical information.

Equality Impact Assessment (EqIA)		
<b>Type of Decision:</b>	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
<b>Title of Proposal</b>	Updated Statement of Community Involvement (SCI)	<b>Date EqIA created: 05/07/2023</b>
<b>Name and job title of completing/lead Officer</b>	Viv Evans, Chief Planning Officer	
<b>Directorate/ Service responsible</b>	Place – Planning and Building Control	
Organisational approval		
<b>EqIA approved by the EDI Team:</b>	<b>Name: Jennifer Rock</b>  <b>Assistant Policy Officer – EDI Team</b>	<b>Signature</b> <input checked="" type="checkbox"/> <b>Tick this box to indicate that you have approved this EqIA</b>  <b>Date of approval: 10/07/23</b>

## 1. Summary of proposal, impact on groups with protected characteristics and mitigating actions

(to be completed after you have completed sections 2 - 5)

### a) What is your proposal?

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

### b) Summarise the impact of your proposal on groups with protected characteristics

This is an update of an existing council statutory document. Minor amendments have been made to reflect changes in planning policy and the way that the council will consult on planning applications/policy documents. There will be no impact on groups with protected characteristics as outlined in the table below.

### c) Summarise any potential negative impact(s) identified and mitigating actions

N/A

<b>2. Assessing impact</b>					
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to <a href="#">borough profile data</a> , <a href="#">equalities data</a> , service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on <b>each</b> group. Where there are gaps in data, you should state this in the boxes below and what action (if any), you will take to address this in the future.		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact			
Protected characteristic	For <b>each</b> protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Negative impact		No impact
			Minor	Major	
<b>Age</b>	<p>There will be no equalities impacts on any specific age group. The SCI is a borough wide document that enables all community members to interact with the planning system and have their say on planning matters. The SCI is an update to an existing statutory document, minor updates have been made to reflect the Council's approved Corporate Consultation standards which were subject to an EQIA.</p> <p>Between the last two censuses, the average (median) age of Harrow increased by two years, from 36 to 38 years of age. Harrow had a higher average (median) age than London as a whole in 2021 (35 years) but a lower average (median) age than England (40 years).</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Disability</b>	<p>There will be no adverse equalities impacts on any disabled persons or groups. There may be positive equalities impacts as the new SCI updates expectations around online consultation and platforms making it easier for aurally or visually disabled persons to access materials on the new platform. The SCI is a borough wide document that enables all community members to interact with the planning system and have their say on planning matters. The SCI is an update to an existing statutory document, minor updates have been made to reflect the Council's approved Corporate Consultation standards which were subject to an EQIA.</p> <p>In 2021, 5.9% of Harrow residents were identified as being disabled and limited a lot. This figure decreased from 8.2% in 2011.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Gender reassignment</b>	There will be no equalities impacts on any gender group. The SCI is a borough wide document that enables all community members to interact with the planning system and have their say on planning matters. The SCI is an update to an existing statutory document, minor updates have	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>been made to reflect the Council's approved Corporate Consultation standards which were subject to an EQIA.</p> <p>The census question on gender identity was a voluntary question asked of those aged 16 years and over. The question asked "Is the gender you identify with the same as your sex registered at birth?".</p> <p>Overall, 45.7 million (94.0% of the population aged 16 years and over) answered the question. In total, 45.4 million (93.5%) answered "Yes" and 262,000 (0.5%) answered "No". The remaining 2.9 million (6.0%) did not answer the question.</p> <p><b>90.12%</b> of people aged 16 years and over in Harrow have a gender identity the same as their sex registered at birth.</p>				
<p><b>Marriage and Civil Partnership</b></p>	<p>There will be no equalities impacts on any person's marital status. The SCI is a borough wide document that enables all community members to interact with the planning system and have their say on planning matters. The SCI is an update to an existing statutory document, minor updates have been made to reflect the Council's approved Corporate Consultation standards which were subject to an EQIA.</p> <p>The increase in the percentage of people aged 16 years and over who had never been married or in a civil partnership was greater across England (3.3 percentage points) than in Harrow (1.0 percentage points).</p> <p>In Harrow, the percentage of adults who had never been married or in a civil partnership increased from 32.3% in 2011 to 33.2% in 2021. During the same period, the percentage across England increased from 34.6% to 37.9%.</p> <p>The percentage of adults who were married or in a civil partnership in Harrow increased from 53.8% to 53.9%, while the percentage of adults who had divorced or dissolved a civil partnership increased from 5.4% to 5.7%.</p> <p>These figures include same-sex marriages and opposite-sex civil partnerships in 2021, neither of which were legally recognised in England and Wales in 2011. Same-sex marriages have been legally recognised in England and Wales since 2014 and opposite-sex civil partnerships have been recognised since 2019.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<p><b>Pregnancy and Maternity</b></p>	<p>There will be no equalities impacts on any pregnant person or persons with a child. The SCI is a borough wide document that enables all community members to interact with the planning system and have their say on planning matters. The SCI is an update to an existing statutory document, minor updates have been made to reflect the Council's approved Corporate Consultation standards which were subject to an EQIA.</p> <p>The percentage of households including a couple but no children fell in Harrow, but rose across London.</p> <p>In Harrow, the percentage of households including a couple without children fell from 12.3% in 2011 to 11.0% in 2021. During the same period, the regional percentage increased from 13.8% to 14.2%.</p> <p>The percentage of households including a couple with dependent children in Harrow increased from 22.9% to 23.0%, while the percentage of households including a couple with only non-dependent children increased from 9.1% to 10.1%.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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<p><b>Race/ Ethnicity</b></p>	<p>There will be no equalities impacts on any ethnic group. The SCI's explanation of new online consultation software will allow online translation of content into other languages, potentially having a positive impact on the ability of different races and ethnicities to access and respond to information. The SCI is a borough wide document that enables all community members to interact with the planning system and have their say on planning matters. The SCI is an update to an existing statutory document, minor updates have been made to reflect the Council's approved Corporate Consultation standards which were subject to an EQIA.</p> <p>In the latest census, around 125,100 Harrow residents said they were born in England. This represented 47.9% of the local population. The figure has decreased from just over 128,400 in 2011, which at the time represented 53.7% of Harrow's population.</p> <p>In 2021, 7.2% of Harrow residents identified their ethnic group within the "Other" category ("Arab" or "Any other ethnic group"), up from 2.9% in 2011. The 4.3 percentage-point change was the largest increase among high-level ethnic groups in this area.</p> <p>Across London, the percentage of people from the "Other ethnic groups" ("Arab" or "Any other ethnic group") increased from 3.4% to 6.3%, while across England the percentage increased from 1.0% to 2.2%.</p> <p>In 2021, 45.2% of people in Harrow identified their ethnic group within the "Asian, Asian British or Asian Welsh" category (compared with 42.6% in 2011), while 36.5% identified their ethnic group within the "White" category (compared with 42.2% the previous decade).</p> <p>The percentage of people who identified their ethnic group within the "Black, Black British, Black Welsh, Caribbean or African" category decreased from 8.2% in 2011 to 7.3% in 2021.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Religion or belief</b></p>	<p>There will be no equalities impacts on any religious group or persons. The SCI is a borough wide document that enables all community members to interact with the planning system and have their say on planning matters. The SCI is an update to an existing statutory document, minor updates have been made to reflect the Council's approved Corporate Consultation standards which were subject to an EQIA.</p> <p>In 2021, 15.9% of Harrow residents described themselves as Muslim, up from 12.5% in 2011. The rise of 3.4 percentage points was the largest increase of all broad religious groups in Harrow. Because the census question about religious affiliation is voluntary and has varying response rates, caution is needed when comparing figures between different areas or between censuses.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>Across London, the percentage of residents who described themselves as Muslim increased from 12.6% to 15.0%, while across England the percentage increased from 5.0% to 6.7%.</p> <p>In 2021, 33.9% of people in Harrow described themselves as Christian (down from 37.3%), while 25.8% described themselves as Hindu (up from 25.3% the decade before).</p>				
<b>Sex</b>	<p>There will be no equalities impacts on any sex or gender posed by the SCI. The SCI is a borough wide document that enables all community members to interact with the planning system and have their say on planning matters. The SCI is an update to an existing statutory document, minor updates have been made to reflect the Council's approved Corporate Consultation standards which were subject to an EQIA.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Sexual Orientation</b>	<p>There will be no equalities impacts on any persons regardless of their sexual orientation. The SCI is a borough wide document that enables all community members to interact with the planning system and have their say on planning matters. The SCI is an update to an existing statutory document, minor updates have been made to reflect the Council's approved Corporate Consultation standards which were subject to an EQIA.</p> <p>87.16% of people aged 16 years and over in Harrow are straight or heterosexual</p> <p>2.02% of people aged 16 years and over in Harrow are lesbian, gay, bisexual, or other (LGB+)</p> <p>10.82% of people aged 16 years and over in Harrow did not answer this question.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?</b></p> <p><input type="checkbox"/> Yes                      No    <input checked="" type="checkbox"/></p>					
<p>If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below</p>					
<p><b>2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc), could your proposals have an impact on individuals/service users, or other groups?</b></p>					



Yes

No

If you clicked the Yes box, Include details in the space below

### 3. Actions to mitigate/remove negative impact

**Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.**

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for <b>each</b> group, identified in section 2. In addition, you should also consider and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact please state below.	Deadline date	Lead Officer

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#### 4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

**Include details in the space below**

#### 5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies

Outcome 1

**No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed**

Outcome 2

**Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4**

Outcome 3

**This EqIA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.**

Include details here

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LONDON BOROUGH OF  
**HARROW**

# **Planning Policy Advisory Panel**

## **Minutes**

### **13 July 2023**

**Present:**

**Chair:** Councillor Marilyn Ashton

**Councillors:** Christopher Baxter Paul Osborn  
Stephen Greek Varsha Parmar  
Graham Henson David Perry

**Apologies received:** Zak Wagman  
Nitin Parekh  
Asif Hussain

## **Recommended Items**

## 10. Statement of Community Involvement Report

The Panel received the Updated Statement of Community Involvement (SCI).

The report set out the updated SCI as a replacement for the 2012 version.

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

The Panel discussed the report, and consequently, unanimously recommended it to Cabinet for adoption.

### Reason For Recommendation

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

### Options considered

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

### **RESOLVED: To RECOMMEND** (To Cabinet):

- a) notes and comments on the draft SCI and proposed changes;
- b) notes and comments on the intention not to formally consult on the document; and
- c) commends the updated Statement of Community Involvement (SCI) to Cabinet for adoption, subject to any legal advice received in relation to not undertaking consultation.



**Report for: Cabinet**

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<b>Date of Meeting:</b>	27 July 2023
<b>Subject:</b>	Review and adoption of the Corporate Property Strategy 2023-2028
<b>Key Decision:</b>	Yes, due to the potential savings and borough-wide implications
<b>Responsible Officer:</b>	Dipti Patel – Corporate Director, Place
<b>Portfolio Holder:</b>	Cllr Norman Stevenson - Portfolio Holder for Business, Employment and Property;  Cllr David Ashton - Portfolio Holder for Finance and Human Resources.
<b>Exempt:</b>	No
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All
<b>Enclosures:</b>	The Corporate Property Strategy

## Section 1 – Summary and Recommendations

This report seeks approval of a Corporate Property Strategy, providing the Council with a new strategic approach to the management of its corporate land and buildings, outlining how the use of the Council's assets will support the delivery of the Council's priorities.

### **Recommendations:**

Cabinet is requested to:

1. Approve the adoption of the Corporate Property Strategy 2023 to 2028;
2. Delegate authority to the Corporate Director Place, in consultation with the Portfolio Holder for Business, Employment & Property, to make minor amendments to the Strategy as necessary.

**Reason (for recommendations):** The adoption of the CPS will strengthen the Council's management of its assets, providing greater assurance that they are safe, comply with statutory requirements as well as creating the opportunity to improve the quality and value for money of the services they can deliver for staff, partners and residents. The foundations of this process will require robust data, processes and procedures together with strong governance and decision-making.

## Section 2 – Report

### 1.0 Introductory paragraph

1.1 An effective asset management strategy, known here as the Corporate Property Strategy (CPS), is an integral part of the mechanism to deliver the corporate aims and objectives of the London Borough of Harrow through its property portfolio, enabling it to proactively support the Council's key priorities:

- A council that puts residents first
- A borough that is clean and safe
- A place where those in need are supported

1.2 This CPS informs policies enabling the Council to develop action plans, agree priorities and make decisions to meet the longer-term objectives of the Council's Corporate Plan in relation to the use of any commercial or corporate assets. This strategy is a cornerstone of the Council's financial and service planning, contributing to savings in the Medium-Term Financial Strategy (MTFS). The Strategy will be reviewed and updated annually to reflect changes in legislation, policy and best practice; ensuring our land and property assets fully support the Administration's objectives.



- 1.3 The strategy covers a range of requirements the Council should enact, as a responsible property owner, including sustainability, repair, compliance, leased estate management, adopting Corporate Landlord and improving governance, backed up and evidenced by a comprehensive data set which has pulled together every corporate and commercial property interest the Council owns, both freeholds and leaseholds. Housing sits outside this strategy, as the HRA will develop an asset management strategy of its own, but some residential dwellings do sit within the General Fund and so form part of the Corporate data set.
- 1.4 The CPS also recommends the procurement of an Integrated Workplace Management System (IWMS) which will provide a single platform from which all Estates and Facilities Management functions and business will operate ensuring a cohesive 'One Front Door' approach to property management. This is a separate workstream and will be administered through the usual Gateway and procurement procedural rules.
- 1.5 The CPS proposes a number of workstreams and processes to take forward, all of which will be subject to further financial and business case scrutiny, as well as identifying resources and work plans and programme management.
- 1.6 The principals of this strategy have been approved by the Council's Senior Leadership team in June 2023, with an instruction to obtain approval from Cabinet.

## **2.0 Options considered**

- 2.1 An alternative option would be to continue without a formal strategy in place. The Council could maintain the status quo by managing its property assets in a non-strategic, reactive and un-co-ordinated way. However, this approach would leave the Council vulnerable and with limited opportunities to achieve efficiencies as well exposure to risk and increased costs, through the ineffective and ad hoc management of a large and complex estate.

## **3.0 Financial Implications**

- 3.1 The Corporate Property Strategy (CPS) sets out six key projects to deliver its objectives. Some of these will have direct financial implications, however they are not quantified in the strategy.
- 3.2 The Council set a 3 Year Medium Term Financial Strategy which incorporates the 3 Year Capital Programme, the current strategy covering 2023/24 to 2025/26, which is refreshed annually. The approved Capital Programme includes a budget provision of £0.650m per annum for High Priority Planned Maintenance. Due to the assets review, capital investment on corporate properties was paused and

therefore a capital budget of £1.133m from previous years was carried forward into 2023/24, making a total available budget of £1.783m in 2023/24, £0.650m in 2024/25 and £0.650m in 2025/26. In addition, there is a budget provision of £0.500m per annum for Climate Emergency Energy Emissions Reduction Measures project. There is no capital budget and funding for additional capital financing costs should a 5-year capital programme be developed (Project 6 in the CPS) which exceeds current budget provision.

- 3.3 A one-off corporate funding of £150k was agreed in 2022/23 for undertaking the assets review. £85k of this has been committed for external consultancy. The remaining £65k is set aside to contribute towards the cost of implementing an asset management software (Project 5 in the CPS). This proposal is subject to a separate business case to inform both the one-off implementation costs and on-going revenue support & licence costs. No funding is identified in the MTF5 for these other than the remaining one-off sum above.
- 3.4 Project 6 in the CPS also refers to the development of a 5-year condition survey programme. There is currently no funding to undertake this should the work be commissioned externally.
- 3.5 There is currently a revenue budget of £1.280m per annum for funding planned preventative maintenance (PPM) and reactive repairs of our corporate property portfolio. This budget is currently and historically overspent whereby the cost reactive repairs far exceeds the budget available. The CPS aims to deliver a more effective approach for managing the Council's properties by introducing a planned investment programme and disposing of properties that are surplus to our requirements which must return expenditure to within the approved budget envelope.

## 4.0 Risk Management Implications

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

4.2 Separate risk register in place? **Yes**

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

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

Risk Description	Mitigations	RAG Status
The CPS is not adopted	<ul style="list-style-type: none"> <li>▪ Acceptance of the proposed recommendations of the report will mitigate this risk</li> </ul>	<b>GREEN</b>

Risk Description	Mitigations	RAG Status
	<ul style="list-style-type: none"> <li>▪ The status quo would prevail with assets recorded on multiple spreadsheets.</li> </ul>	<b>GREEN</b>
Adoption of the plan but resources are not in place	<ul style="list-style-type: none"> <li>▪ Adapt according to resources, reviewing priorities</li> </ul>	<b>AMBER</b>
Market conditions are adverse	<ul style="list-style-type: none"> <li>▪ Adapt the strategy accordingly, ensuring that workstreams and activities are proportionate to micro- and macro-economics conditions</li> </ul>	<b>GREEN</b>
Officers may be unaware of the requirements of the CPS as it relates to their role	<ul style="list-style-type: none"> <li>▪ The adopted CPS should be widely communicated both internally and externally.</li> <li>▪ Heads of Service and service managers to brief staff on key requirements of the CPS, including the new role of corporate landlord</li> </ul>	<b>GREEN</b>
Service requirements will change over the course of the lifetime of the CPS	<ul style="list-style-type: none"> <li>▪ The position will be monitored and the strategy developed and its work plan kept under review, throughout the plan period.</li> </ul>	<b>GREEN</b>
There has been insufficient engagement and consultation with stakeholders in formulating the strategy	<ul style="list-style-type: none"> <li>▪ Wide-ranging consultation on the strategy has taken place with both senior officers and Members and also external stakeholders (e.g. NHS and the Voluntary Sector)</li> </ul>	<b>GREEN</b>
The objectives of the strategy have not been clearly specified and set	<ul style="list-style-type: none"> <li>▪ There are six objectives as outlined above in the report</li> </ul>	<b>GREEN</b>
Arrangements for performance management and measuring the success of the strategy have not been put in place	<ul style="list-style-type: none"> <li>▪ The timetable for implementation is included in the strategy and this will be monitored quarterly</li> </ul>	<b>GREEN</b>

<b>Risk Description</b>	<b>Mitigations</b>	<b>RAG Status</b>
Performance Indicators and measures are not SMART	<ul style="list-style-type: none"> <li>▪ These will be developed over the course of the strategy</li> </ul>	<b>AMBER</b>
A suitable Integrated Workplace Management System (IWMS) cannot be technically or financially procured from the market	<ul style="list-style-type: none"> <li>▪ A reliable and proven and tested software system will be chosen</li> </ul>	<b>GREEN</b>
There is insufficient technical support and staff training available or undertaken to effectively use/deploy the IWMS	<ul style="list-style-type: none"> <li>▪ Staff will be fully trained and also supported by the providers of the system</li> </ul>	<b>GREEN</b>
Officer roles and responsibilities in relation to the strategy have not been clearly defined and allocated	<ul style="list-style-type: none"> <li>▪ This is on-going and will be completed as the strategy progresses</li> </ul>	<b>GREEN</b>
The strategy is inflexible and cannot be quickly adapted to meet changing circumstances and assumptions	<ul style="list-style-type: none"> <li>▪ The strategy will be reviewed annually and also quarterly via performance monitoring</li> </ul>	<b>GREEN</b>

## **5.0 Procurement Implications**

- 5.1 In respect of future workstreams arising from the CPS that are subject to competitive procurement, this will be undertaken with support and advice from the Corporate Procurement Team and consistent with the Council's Contract Procedure Rules, Public Contract Regulations 2015 and the Financial Regulations.
- 5.2 Any purchase or sale of a property, or other interest in land (freehold or leasehold) is excluded from the Contract Procedure Rules but must be authorised in accordance with the requirements set out in the Constitution and, specifically, Land and Buildings rules at paragraphs C83 to C85 and Section F *Land and Property Disposals*.

## **6.0 Legal Implications**

- 6.1 It is good Governance practice for a Local Authority to have an up-to-date Corporate Property Strategy. The CPS will not only allow the Council to understand more about the ownership of its estate, but it will enable it to respond in a more timely and efficient fashion to statutory and other notices/approaches.
- 6.2 Section 111 of the Local Government Act 1972 ("LGA") gives a local authority power to do anything which is calculated to facilitate or is

conductive or incidental to the discharge of any of its functions and the Localism Act 2011 provides the Council power to do anything that individuals generally may do provided it is not prohibited by legislation and subject to Public Law principles. The proposals set out in this report are consistent with this power.

- 6.3 Legal advice should be sought at the point at which the Integrated Workplace Management System (IWMS) is procured, so that the procurement of this system is considered in line with the Council's Contract Procedure Rules and Public Contract Regulations 2015.
- 6.4 It is noted that the considerations of the Equality Act 2010 will be taken into account at the relevant time. Accordingly, at this stage there are no particular legal issues which arise with this report.

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

- 7.1 There are no specific implications from implementing the strategy. However, it will be necessary to consider equality impacts as part of specific asset management activity.

## **Council Priorities**

- 1. A council that puts residents first**  
By ensuring a better understanding of our assets and how we can use them better, residents will be served better, whether improving and investing in community buildings, answering queries more promptly, or generating new income to support services.
- 2. A borough that is clean and safe**  
The new IWMS will improve the compliance in respect of our corporate and commercial properties.
- 3. A place where those in need are supported**  
Improving our asset base will enable better use of buildings and properties to support residents most in need, for example, step-up flats for people with mental health issues, could be refurbished with proceeds from disposals of surplus and poor-quality buildings which have been identified as a result of the CPS.

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

### **Statutory Officer: Dawn Calvert**

Signed by the Chief Financial Officer  
6 July 2023

### **Statutory Officer: Amanpreet Lally**

Signed on behalf of the Monitoring Officer

7 July 2023

**Chief Officer: Dipti Patel**

Signed off by the Corporate Director

7 July 2023

**Head of Procurement: Nimesh Metha**

Signed on /by the Head of Procurement

27 June 2023

**Head of Internal Audit: Neale Burns**

Signed on behalf of Head of Internal Audit

30 June 2023

**Has the Portfolio Holder(s) been consulted? Yes**

## **Mandatory Checks**

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

**EqlA carried out: No**

As per the above, further workstreams, business cases and decision-making will incorporate EqlAs on a case-by-case basis.

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

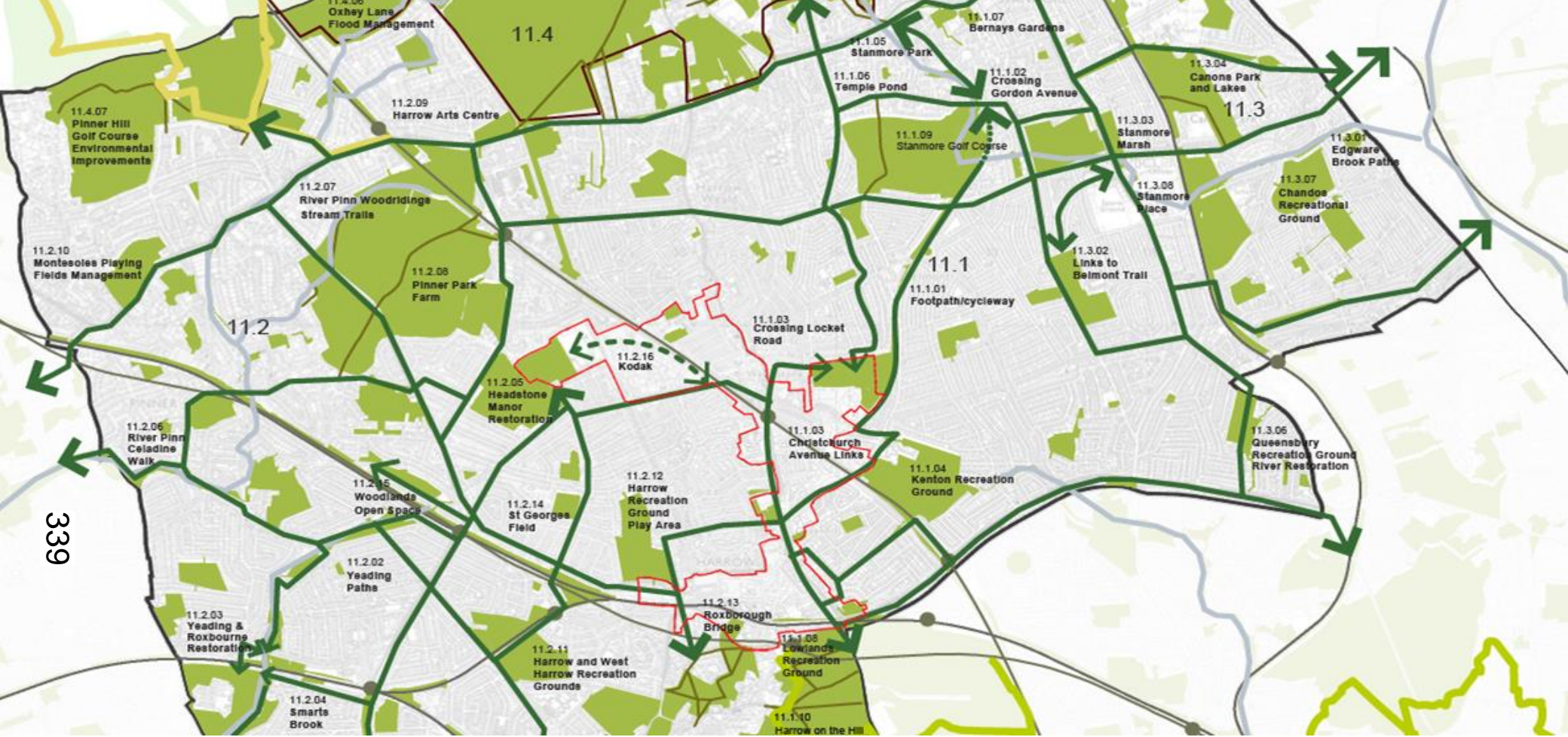
**Contact:** Sophie Linton, Estates Manager,

[Sophie.Linton@harrow.gov.uk](mailto:Sophie.Linton@harrow.gov.uk)

**Background Papers:** None

**Call-in waived by the Chair of Overview and Scrutiny Committee - NO**





# Corporate Property Strategy 2023 to 2028



LONDON BOROUGH OF  
**HARROW**





Foreword

## **PART 1 STRATEGIC CONTEXT**

Executive Summary

Estate Vision and Projects

Estate Summary

Regeneration Schemes

Investment Estate

## **PART 2 SHAPING THE FUTURE**

The Estate Vision

Property Financial Overview

Estate Planning – Operational Property

Corporate Landlord and Governance

Sustainability, Climate Change and

Decarbonisation

## **PART 3 DELIVERY**

CPS Workstreams

CPS Roadmap

Workstream Timetable



# Foreword

## Cllr Norman Stevenson

I am very pleased to introduce this Corporate Property Strategy (CPS) which has been prepared by the London Borough of Harrow to set out our approach for managing our buildings over the next five years. Our Council estate includes land and property resources which are occupied by our staff and partners to deliver services to our communities.

341 The provision of fit for purpose buildings is a prerequisite to achieving our objectives. I am committed to investing in estate resources, infrastructure and projects that are key to maintaining our operational effectiveness and advancing our programme of business change.

We will progress the implementation of a Corporate Landlord function, which will be the enabler for the changes proposed by this CPS. This will ensure our property decisions are both process and data led. We will be proactive, well informed and transparent with the decisions we make.

With finite resources we will need to proceed with caution, investing in the right buildings for the future and releasing those which do not adequately support our Council services. This will allow us to create a leaner, more sustainable estate, which is increasingly accessible, and more community focused.

I look forward to the implementation of the CPS, working closely with all stakeholders to achieve our goals.



Cllr Norman Stevenson Member for Business, Employment and Property



342 **PART 1 STRATEGIC CONTEXT**

# Executive Summary

This is our first Corporate Property Strategy (CPS). This document sets out how we intend to transform our estate to deliver better accommodation to support our services across Harrow. Our CPS provides us with a strategic direction for our estate but is also a continuous tool for change, with a delivery plan and methodology for review.

Our CPS is ‘service led’. We conducted 27 meetings across the Council to understand the latest service requirements, directing our future need for property.

Our CPS is ‘data driven’. We use the latest data to assess the properties, ensuring the basis of our recommendations are accountable and can be easily updated.

We are committed to Restoring pride in Harrow by prioritising putting residents first, working to create a clean and safe borough and supporting those in need. We want to deliver a well-run organisation that can live within its means providing the good value for money services that residents deserve.

Our three corporate priorities are:

- A council that puts residents first
- A borough that is clean and safe
- A place where those in need are supported

We are developing a vision of what its property estate should look and feel like. The property portfolio will be reviewed now, and plans will be delivered over the next 5 years so that we will have a property estate that is:

- Fit for purpose, cost effective and well utilised assets function effectively and enable staff and the public to use them. Value for money is achieved by creating flexible buildings that support high utilisation and multiple uses
- Sustainable and efficient assets are well maintained and are efficient in their uses of power, resources and new technology to support a carbon zero target.
- Commercially managed assets that are held for income generating purposes will be commercially managed and sweated to generate income to support frontline services.
- Easily accessible and multi-functional assets should be located close to good transport links. Where possible, we will share facilities with other public bodies and not for profit agencies to ensure that residents have access to all the facilities and support they need.

We will ensure that our property assets are fit for purpose and supporting key objectives a continuous cycle of review will be implemented and managed through the revised governance arrangements set out on page 24.



# Estate Vision and Projects



## Our Vision

London Borough of Harrow holds property to sustain and support its corporate objectives as set out in the emerging Corporate Plan and as well as other strategies, for the benefit of its residents, businesses and communities. We play a key civic leadership and place shaping role, working with partners to maximise the totality of physical assets across the borough.

To support our vision for "Putting Residents First", over the next 5 years, we will implement and manage a continuous cycle of review through rigorous governance to ensure its property estate is:

- Fit for purpose, cost effective and well utilised
- Sustainable and efficient
- Commercially managed
- Easily accessible and multi-functional

Our CPS that ensures we have a property estate that will enable us to deliver services for and to our communities. This strategy has identified six key priorities to be developed and implemented.

## We will achieve our vision through the following projects

- 1 Review of our Property Assets.** This document reviews our operational, investment and community assets.
- 2 Property Sustainability Action Plan.** We will be supporting carbon neutrality by 2030, use clean energy and work towards best in class waste management and recycling.
- 3 Corporate Landlord Model.** We will unlock value through integrated decision making, supporting delivery of objectives.
- 4 Strategic Facilities Management.** We will align our FM work with our organisational and service team objectives. We will produce a maintenance strategy and condition survey programme.
- 5 Asset Management Software.** We will create a single repository for all property information allowing us to measure the performance of our estate.
- 6 Capital Investment.** We will produce accurate expenditure forecasting, supported by condition surveys for our most important buildings, and a corporate planned maintenance regime where needed.



# Our Projects

## Project 1 Review of our Property Assets

**This CPS will provide much needed strategic direction, providing a platform for decision making, both to retain buildings, and when required, to release buildings through a targeted disposal programme.**

The CPS is to be reviewed annually, but the actions are to be progressed as part of day to day business. This CPS is designed to be a catalyst for change, to gather and record more and more detail about our estate and the requirements of our services. Our CPS is more than a list of aspirations, but a methodology and continuous assessment of opportunities and delivery.

We have discussed the CPS with services and stakeholders across the Council to understand future property need. We intend to continue that engagement, to playback recommendations and discuss new ideas.

We need to modernise our buildings to ensure they are fit for purpose and energy efficient. We cannot afford to invest in all our buildings and we will need to reduce the size of our estate, ensuring we retain the right buildings which are well located. To achieve this we will release costly and inefficient buildings and use the savings and receipts to reduce the burden of our tax payers and invest in new buildings.

Our Hub building provides us with efficient accommodation for the majority of our office based staff. We have an up to date cloud based network which supports the flexible occupation of our buildings and agile working practices. We can now focus on improving the accessibility of our property for customers and

services, supporting our Early Intervention and Family Hub initiatives. We will create multi-facility hubs, bringing public sector partners together, allowing more front facing public access across Harrow.

Our estate provides us with opportunities: we own nearly all our properties and we are not overly exposed to property investments which might otherwise be struggling in today's economic climate. We have a number of regeneration schemes with potential to provide 2,000+ houses. We can build upon this by using surplus sites for alternative use to regenerate, create employment opportunities or the development of new homes.

Our roadmap and timetable (pages 32 & 33) identifies the activities we need to undertake to achieve these goals. Our new Strategic Estates Group will be the forum for our Corporate Landlord function to efficiently manage activities, providing a single point of contact for service and other stakeholders.

We are confident that this CPS will enable the transformation of our estate, bringing savings and offering better accommodation for services and residents to use.





# Our Projects

## Project 2 Property Sustainability Action Plan

The Climate and Ecological Emergency, Interim Strategy and Action Plan was approved by Cabinet, setting out a proposed strategic framework and initial actions that establish pathways to carbon neutrality by 2030, both as an organisation and on a borough-wide basis.

Our existing Climate Change Strategy, adopted in January 2019, will be revised and integrated into the new strategic framework which is organised around seven key thematic areas. Taken together these aim to provide a holistic approach that seeks to address the major causes of CO2 emissions whilst also taking action to move towards a more sustainable borough and improve wellbeing and equality outcomes:

- Clean Energy Used Efficiently
- Zero Emission Transport
- A Waste-Free Borough
- Healthy Places for Us and the Rest of Nature
- Good Governance for Long Term Sustainability
- Eco-literate and Engaged Communities
- A Socially Just Transition

The interim action plan focuses on a range of actions which are directly within our own control or serve to reduce the organisation's own carbon footprint, and borough wide actions that require co-operation with others to effect change.

One of the initial priorities being to ensure that our own ongoing and proposed construction activities aim to contribute towards carbon neutrality.



# Our Projects

## Project 3 Corporate Landlord Operating Model

We will progress a corporate landlord operating model to support the management of our property assets. The corporate landlord approach is an industry standard operating model that is generally adopted by large public and private sector organisations and effectively centralises the responsibility and accountability for property management and performance.

The corporate landlord approach is designed to enable a local authority landowner to utilise its assets to deliver better, more efficient services to communities:

- To unlock the value of property assets, seek efficiencies through joint arrangements with other public sector bodies and maximise private sector investment
- To support the delivery of our key objectives and priorities
- To integrate thinking about property with financial, regeneration and other corporate considerations

Under a corporate landlord approach the "ownership" of property assets and the responsibility and liability for their management, maintenance and funding is transferred from the service department to the Corporate Landlord, which is a centralised property team. Services are required to produce regular service plans that include property requirements to justify the ongoing property requirement and support any change requirements, thus ensuring that only the accommodation that is needed is provided. The corporate landlord will regularly audit and perform utilisation surveys to ensure that the property assets are sweated and fully used. Service departments become users, and their sole focus will be on service delivery. Every decision will be backed by a robust business case to demonstrate how

a change to an asset could contribute to a saving or increase revenue/capital growth.



# Our Projects

## Project 4 Strategic Facilities Management Plan

We will adopt a strategic approach to facilities management which recognises the strong link between the workplace and the organisation's levels of productivity. We will achieve this by aligning FM to support the wider organisational performance objectives such as employee wellbeing and environmental performance.

Our strategic approach will consider what the organisation needs FM to provide, and how we put in place the processes and procedures that ensure those services are provided as efficiently and effectively as possible for the lifespan of the assets, whilst also incorporating a strategic element to the operational side of FM such as maintenance services.

### Maintenance Strategy

The maintenance strategy will provide a strategic framework for identifying, prioritising, planning, managing and monitoring the maintenance of the council's property assets. To align this strategy with the Strategic FM approach, we will consider maintenance needs holistically and over the lifespan of the assets.

Our maintenance strategy will aim to provide a planned preventative maintenance regime. This will reduce and limit the burden of reactive maintenance to that associated with accidental damage or product failure before the end of its planned life. Reactive maintenance is generally more expensive to address and carries a higher risk to Health & Safety than planned preventative maintenance, so a targeted effort to improve planned maintenance will inevitably improve cost efficiencies.





# Our Projects

## Project 5 Integrated Workplace Management System (IWMS)

As part of our review of property data management systems and processes, it has been established that an integrated workplace management system is required which will provide a single record and management system for all the non-housing property and land holdings. The system will hold functionality for our core property services including Facilities Management, Estate Management and Property Maintenance departments.

A new property asset management and facilities management software system will allow us to better manage the following core business processes and activities:

- Manage all the corporate properties and assets in one single place. The production of planned maintenance schedules and ensuring that buildings are statutory compliant
- Remedial works resulting from inspections/surveys are recorded, monitored and completed on time
- Processing reactive maintenance requests via the helpdesk and as an outcome of a maintenance activity
- Production of management information & client reporting, such as future asset liability and key performance indicators
- This software will be a critical tool in supporting our objectives, assessing property performance, understanding utilisation and backlog maintenance, and recording running costs.

This will be critical to ensuring we can maintain a cost effective and efficient property estate to support service delivery and provide a single repository for all property information and data across our non-domestic property estate.



# Our Projects

## Project 6 Capital Programme

The development of a 5-year capital programme will enable our property and finance teams to accurately forecast expenditure and efficiently procure technical and contractor resources. The programme will help ensure that buildings and property assets are well maintained and that the process for drawing down capital funding is governed and efficient.

Well informed decision making relies on accurate and current data. The collation of good quality, accurate data is a key priority and will support the asset review programme and present immediate opportunities to identify poorly performing and costly property stock.

Our decisions for change will be well informed by business cases and clear financial impact assessments which align with our long term vision. As part of this we will gather more information allowing us to better measure the performance of our estate. For key buildings this may include the following.

- Condition surveys
- Running cost and energy performance
- Occupancy and space data

A 5-year condition survey programme will be developed and will target 25% of the portfolio per annum. It is considered good practice by the Royal Institution of Chartered Surveyors (RICS) to conduct regular condition surveys of property assets. This enables early identification of issues, cost avoidance in treating defects early and regular monitoring of major plant items to inform maintenance programmes and strategies. The data and information that is collected will be stored on the Asset Management System.

The condition surveys will identify backlog maintenance of property assets to inform and develop a 5-year planned capital investment

strategy. The condition surveys will also identify opportunities to contribute to carbon zero target by replacing M&E kit such as boilers with ground source and air source heat pumps and the installation of energy efficient materials and plant such as solar panels.



# Estate Summary



## Harrow is a unique London Borough, offering diversity, green space and excellent transport connections to London and the home counties.

- Our Borough is a home to families with a large supply of low rise suburban houses with gardens. We have lower property prices compared to the London average.
- Over a quarter of our Borough is open green space, the majority being green belt. We have numerous parks, recreation ground and sports pitches.
- We are well connected, particularly from north to south by road and rail to central London and nationally.
- Harrow is one of the most ethnically and religiously diverse boroughs in the country.
- Harrow is home to 15,000+ businesses, with 14,000 of these being SME's.
- We have high education standards, upheld by prominent schools in the Borough.

## The London Borough of Harrow Estate

- Our estate extends to over 1,340 assets with a core operational estate of 212 properties.
- Our total estate value exceeds £200 million.
- Our estate holds a wide range of assets comprising of allotments, car parks, churches, council properties, investment properties, community properties, land, leisure facilities, and open space.

- Harrow has freehold ownership of 97% by number of buildings, compared to Barnet which owns 86% of its estate, and Brent which owns approximately 91%.
- The land and open space assets cover over 550 hectares, (1359 acres) compared to Brent's reported approximation of 400 hectares (1000) acres.
- The top two industries in Harrow are Computer Consultancy and Management Consultancy, with 21% of the businesses working in these sectors.

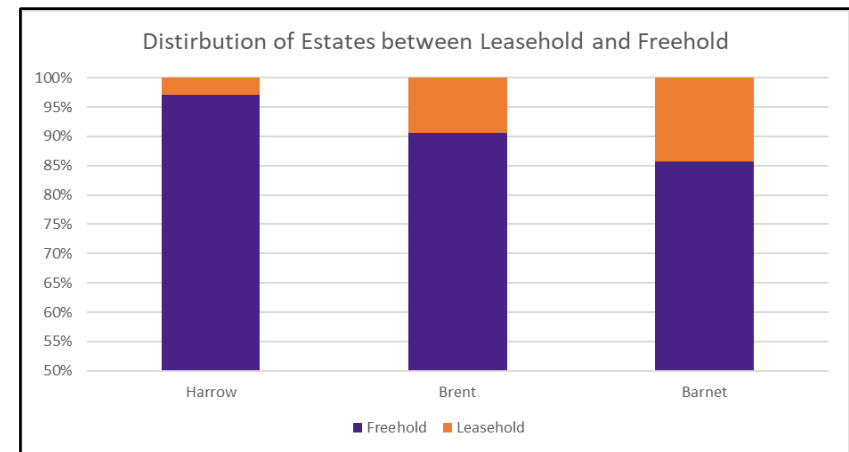


Figure 1: Chart showing property ownership between Harrow, Brent and Barnet

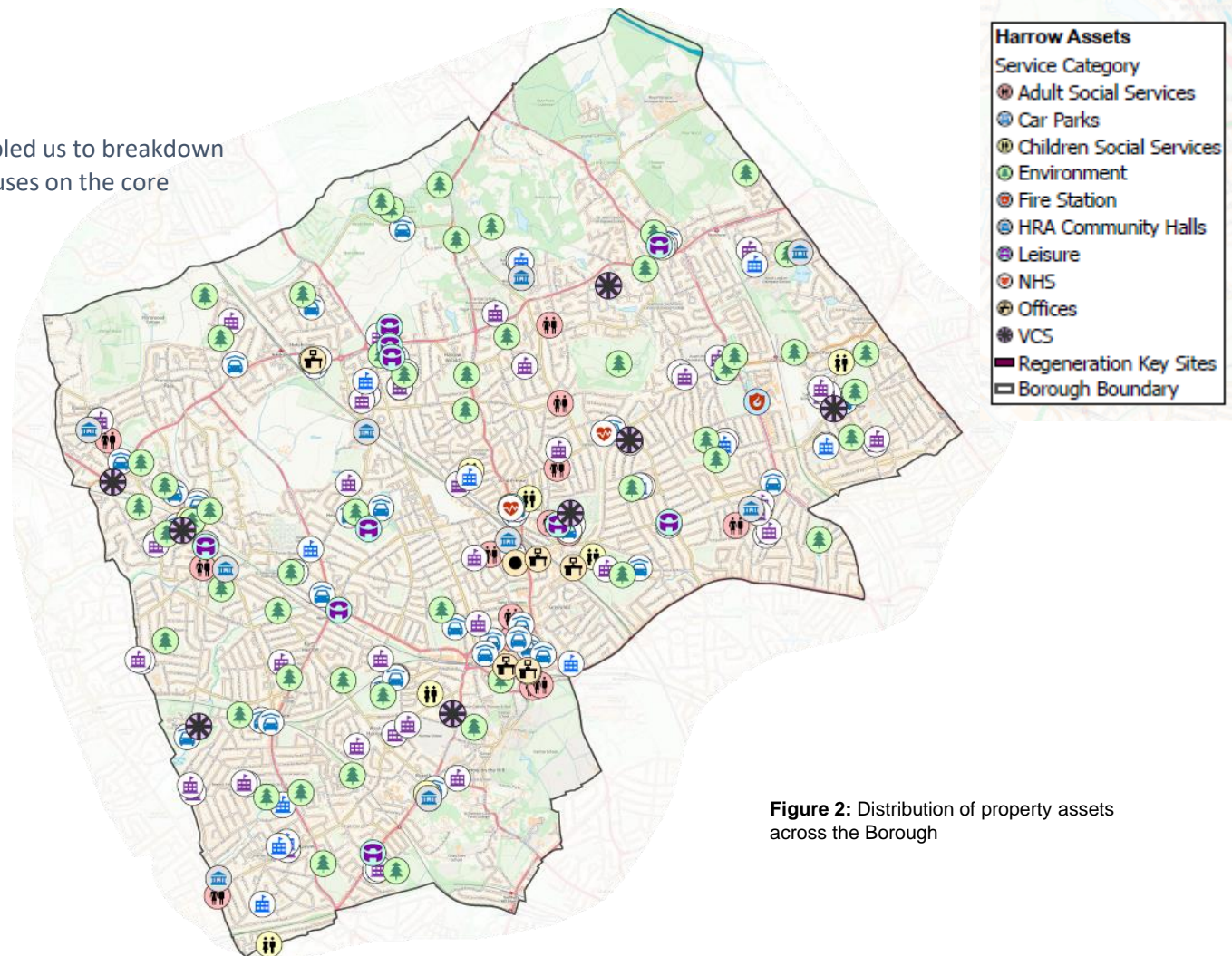
# Estate Summary

## Our Commercial Property Estate

We have categorised all properties which has enabled us to breakdown the estate into manageable sections. Our CPS focuses on the core operational estate shown in the table below.

### Core Estate (service property by number)

<b>352</b> People's Directorate	
Adult Social Services	15
Children Social Services	12
Education	50
NHS occupations	3
<b>Place Directorate</b>	
Car Parks	46
Offices	5
Community Buildings	19
Leisure Services	5
Libraries	6
Open Space / Recreational	51
<b>Total</b>	<b>212</b>



**Figure 2:** Distribution of property assets across the Borough

# Estate Summary

## Service Property Positioning

Figure 3 displays the relationship between the population of our ward areas, and the number of core properties that are located in each area. A number of wards in the South have fewer buildings compared to their population, whilst others such as Pinner Central, has many more properties for the population of the area.

Figure 4 shows the number of core properties in each of the wards. The data and mapping analysis allows us to understand the distribution of service property in Harrow. This helps inform key strategic decisions including for example, which properties may be best placed for future service delivery.

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Figure 3: Core property locations against population

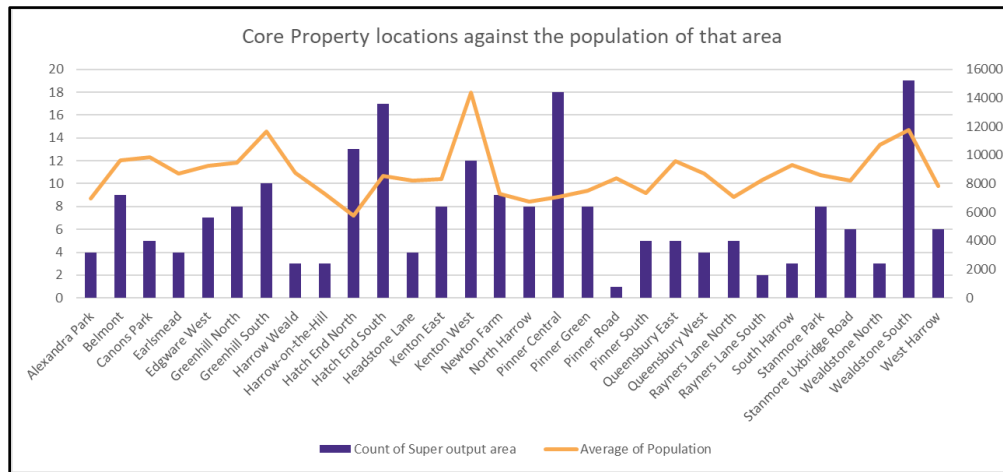
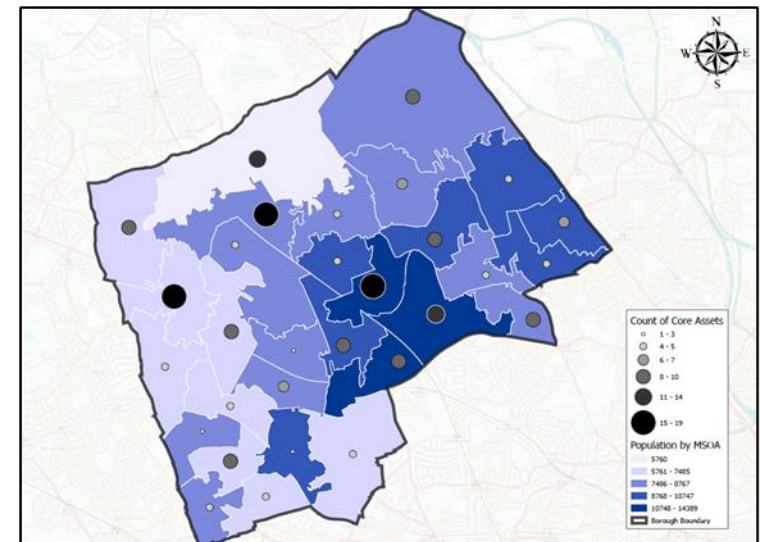


Figure 4: Correlation between population and number of core properties in each ward





# Regeneration Schemes

We have a small regeneration estate compared with some other London Boroughs but we are keen to put Harrow back on the map by proving our ability to offer high quality schemes. Our opportunity areas will support high rise developments, but the rest of our suburban borough has constraints against new high rise buildings. We have already provided housing and public realm developments with our housing partner, Wates through our HSDP (Harrow Strategic Development Partnership) and this will continue.

The current economic situation provides a challenge for progressing some of our regeneration sites. Regardless of this, we will reassess to ensure all our regeneration sites can progress as soon as possible to deliver new housing and public realm in Harrow.

Our existing land and buildings will support regeneration initiatives, and we will focus our activities on the identification of any properties which are within or adjacent to opportunity areas.

Our ambitious Harrow Strategic Development Partnership (HSDP) objectives include:

- To deliver wider regeneration across the Borough via new and improved mixed tenure housing, civic and community facilities, new employment space and the enhanced use of property assets within the Borough
- To accelerate the pace of housing delivery across the portfolio of Sites
- To secure wider economic and social benefits for residents, including skills and training, health improvement and new

employment opportunities

- Use existing and new property assets to optimise value for the Council
- To contribute to the delivery of well-designed, high-quality places that make a difference for communities, business, residents and families both now and in the long term

Property assets can stimulate housing development, growth and regeneration in a number of ways including the following:

- Providing affordable land for development
- Stimulating regeneration through the development of public sector hubs and joint developments
- Job creation and development of business hubs
- Supporting micro economies



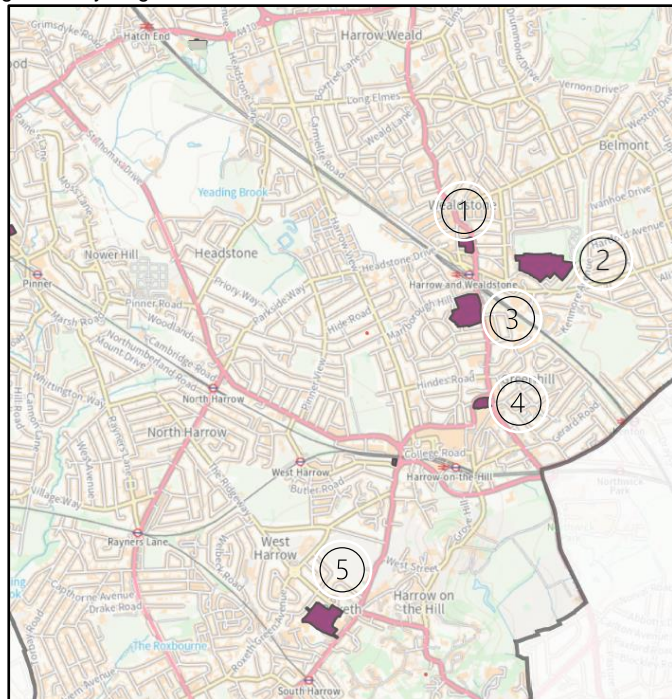
# Regeneration Schemes

The use of our assets to act as a catalyst for development and regeneration is not a new phenomenon; however, the desire for a capital receipt has in the past meant longer-term regeneration opportunities may have been overlooked.

The presence of our council buildings or services often creates high footfall and can lead to a micro-economy which attracts other businesses. Therefore, a local presence is often a lot more than just a local presence; it attracts investment, footfall and activity.

By challenging the rationale for keeping property assets or challenging the use of property assets we will create opportunities for better use of its assets, as well as considering the location of council operations and assets, this can foster better relationships with residents and improve the places people live and work in.

Figure 5: Key Regeneration sites



- 1 Peel Road – HSDP Site
- 2 Byron Quarter – HSDP site
- 3 Poets Corner – Civic Centre, HSDP site
- 4 Greenhill Way car park
- 5 Grange Farm

# Investment Estate

## Investment Property

Our CPS focuses on our operational estate but we do hold a number of properties for investment purposes. Our investment estate is small compared to those held by other London boroughs and nearby Home County Authorities.

We own 66 assets for investment purposes, which generate over £3.5m per annum. The estate includes retail units, golf courses, a garden centre and other varied interests including some properties located outside Harrow. Our largest investment property is Kings House, purchased for £22m in 2021 and brings in over £1,250,000 of rent per annum.

During the current period of economic downturn, our relatively small investment portfolio has meant we are not as exposed as some other Local Authorities for investments which might be making poor returns. Whilst we intend to maximise the returns of our existing investment properties, we will not be actively seeking new large scale property investment acquisitions in the near future.

We may add to our investment estate through the release of surplus operational properties as part of our strategy to create a leaner estate. As we move towards a leaner, more efficient estate it is likely that the land and buildings we release will be smaller land parcels and properties. We will make sure that we that are aware of the latest property market knowledge and make the best returns possible from targeted investment choices that benefit our Harrow residents.

Smaller development / investment opportunities may include:

- Small scale, targeted residential developments
- Industrial / logistics or workshop space serving SMEs
- Hubs/open storage for last mile ecommerce delivery solutions
- EV charging and cycle facilities

We will review our long leasehold interests to understand whether there are opportunities to purchase freeholds where financially beneficial. We may be able to demonstrate a positive marriage value in some cases by purchasing the freehold or intermediate interest.

We will prepare an investment strategy which incorporates these requirements. That strategy will need to align with the new Harrow Economic Strategy 2023 to 2026, our latest regeneration requirements as well as our ongoing MTFS targets.

The chart below displays the use types for our existing investment portfolio by annual rent received.

Investment Use by Revenue

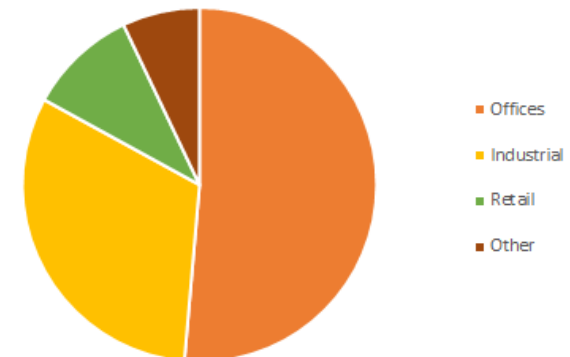


Figure 9: Investment properties use showing proportional income generated





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## **PART 2 SHAPING THE FUTURE**

# Our Estate Vision



Our CPS sets out our wider Council priorities under our overarching vision, 'Putting Residents First'. We have developed a vision for what our estate should look and feel like. Our four visions are set out below with details how this CPS will deliver those visions.

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## Our estate will be (estate visions):      How our CPS will action those visions:

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- |   |   |  |
|---|---|--|
| 1 | <p><b>Fit for purpose, cost effective and well utilised.</b> Assets function effectively and enable staff and public to use them. Value for money is achieved by creating flexible buildings that support high utilisation and multiple uses.</p>   | <p>Reflecting post-pandemic revised working practices we will move towards a future estate that will have less buildings. Those buildings will be of better quality with greater functionality and better utilised. With carefully considered collaboration we will move towards the formation of multi-service hubs. We will use our land and property to provide targeted housing, including housing needs requirements in Harrow.</p>                                   |
| 2 | <p><b>Sustainable and efficient.</b> Assets are well maintained, and are efficient in their uses of power, resources, and new technology to support a carbon zero target.</p>   | <p>We will measure the energy use of our buildings and ensure that we are investing in energy efficient measures on those buildings we will retain. We will refurbish or release our most energy inefficient buildings. Our commitment to the climate change strategy will be creating a leaner, well utilised, more energy efficient estate.</p>  |
| 3 | <p><b>Commercially Managed.</b> Our Investment assets that are help for investment purposes should be commercially managed and 'sweated' to generate income to support frontline services.</p>  | <p>We will undertake an investment estate strategy and carefully manage existing assets to ensure they provide the best returns possible. We will build our investment estate with caution, releasing operational assets where they do not meet our criteria for future use.</p>   |
| 4 | <p><b>Easily Accessible and Multi-functional.</b> Assets should be located close to good transport links. Where possible, we will share facilities with other public bodies and not for profit agencies to ensure that residents have access to as many of the facilities and support they need as possible in one place.</p> | <p>Using our new service focused consultation programme, we will always listen to stakeholder needs, protecting necessary services and amenities for families, children and those in need of improved wellbeing in Harrow. Assessment of social value will ensure we always consider non-financial opportunities. We will always consider our Harrow town centres when considering the placement of services, ensuring the best public accessibility to our buildings.</p> |
-

# Property Financial Overview



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**Buildings are expensive to own and maintain, but also take time to refurbish, dispose or acquire. Our CPS will lead us through the challenging decisions to improve and rationalise our estate and buildings within the finite resources we have. This will contribute to the Medium Term Financial Strategy (which spans 3 years, the first two showing a balanced budget) and ensures the estate is the optimal size for the services we want to deliver for residents: reducing costs, driving savings and identifying new sources of capital and revenue.**

## Capital Programme

As with nearly all public sector estates, we also have an aging estate with an average building age of 40+ years. Some buildings are in poor condition and not fit for purpose. The notable exception is the new Hub which is efficient, and fit for purpose. This is an example of what can be achieved with a clear strategy and confirmed objectives.

From the table at Figure 6 it can be seen that whilst the People’s Directorate (predominately Adults and Children’s services) accounts for 61% of the council’s total service expenditure, it has a small property footprint (23%). A focus on improving the performance of properties in the Peoples service may have a significant impact on reducing costs, for example, through benchmarking, we can ensure a building’s running costs are comparable to similar properties. If a building is notably more expensive to run, we can consider alternative provision. (*Figures, Revenue Budget Summary 23/24*).

We hold a ‘High Priority Planned Maintenance’ (HPPM) program with an annual budget of £650k for 2023/24. Our HPPM programme funds modernisation of the corporate estate (excluding some specific capital projects such as the refurbishment of Harrow Arts Centre). Aside from this

we generally operate a reactive maintenance program.

We need to move away from a reactive maintenance programme. Instead we will obtain backlog maintenance costs for our key buildings to help us to form a better picture of our total estate costs and through analysis of estate data understand which buildings we should be keeping and investing in for the future and which we should be seeking to vacate.

Directorate	% of Total Service Spend	% of Estate (building numbers)
Place	29	77
People	61	23

Figure 6: Table showing the relationship between Directorate spend and Directorate occupation of buildings

## Targets

There have been limited disposals in the last 5 years, partly due to the Covid pandemic but also due to a lack of strategic direction leading to indecision with regard to some buildings.

Capital receipts are built into the 3 Year MTFS with £2.5m being required by 31 March 2025. Some buildings have been identified for disposal and this CPS sets out to understand which other buildings are not contributing to the future running of our estate, and therefore could be released.

# Estate Planning – Operational Property



## The positioning of our corporate buildings should align to our sustainable place making strategy – to support vibrant town and district centres.

Our newly built Hub facility on Forward Drive is the engine room of our Council operations. This state of the art building supports future ways of working with high quality office, meeting and collaboration space. We are now focusing efforts in developing a network of publicly accessible facilities to support our communities in Harrow.

360 We have too many buildings in separate occupancies. There is opportunity to site share and develop a network of multi-service facilities for better functionality. Those facilities need to incorporate other service initiatives including the 'Family Hub' facilities as part of the Early Prevention care programme. These hubs can bring together:

- Customer facing needs
- Operational service needs
- Other public partner services

At present our customer facing services are being run from 3 separate buildings:

- Greenhill Library
- Sheldon House
- Harrow Arts Centre

We will consider, together with our corporate and Chief Executive functions, whether consolidation of those services would be appropriate.

Our Economic Strategy 2021 to 2030 considers the '15 minute neighbourhood', a concept where residents can access local amenities within a travel time of 15 minutes. Our portfolio planning aligns to this strategy as we improve the accessibility of Council services.

Effective future estate planning can only be successful by following our CPS methodology, by collating data and information on the properties we use. We will follow on from our CPS engagement meetings, continuing to work closely with services to build up a picture of future need. The Council does not have funds to create new bespoke hub facilities, so we will use consider use of existing buildings where appropriate.

## The Hub Building, Forward Drive

We intend to improve the access and setting of the Hub building. Some of the depot and recycling uses do not align well with the new Hub facility and we will consider options regarding those uses, allowing us to more efficiently use the space surrounding the Hub building and improve the access.

We will continue to monitor the utilisation of the Hub building. We will offer meeting and collaboration spaces to our public partners to improve engagement with them and maximise the use of the building.

# Corporate Landlord and Governance



Our CPS identifies the importance of a Corporate Landlord model: why the estate should be seen as a corporate asset and why we would benefit from this approach. Our CPS is based on the adoption of a centralised management to ensure that all individual property decisions align with our strategy. For this and many other reasons, all land and property matters must be managed and monitored by the Corporate Landlord Estates Team.

The scope of our corporate landlord model should be without barriers. The corporate landlord function should have oversight of any other part of our organisation which deals with land or property matters including FM, building management, energy decarbonisation, capital programme and data management. Corporate landlord representatives should also be present during all forums which discuss key property matters. As we progress the development of corporate landlord at Harrow, we would expect service areas to incorporate the visions of corporate landlord into their service strategies.

Key strategic issues will be progressed through a 'Strategic Estates Group' (SEG). This group will ensure that the recommendations, principles and actions from the CPS are discussed, developed and implemented. Delivery of the CPS can only be achieved with a Corporate Landlord team in place. Once established, it follows that all land and property transactions, searches, leasing and legal work should be authorised by the corporate landlord team.

We will look to set up service team property representatives and single points of contact in the estates team for all respective services' requests, enabling a single channels of communication. This will also ensure that projects align with the CPS and briefs can be developed quickly.



# Corporate Landlord and Governance

The CPS sets out a new set of clear governance steps for decisions around property, all of which are governed ultimately, by the Constitution of Harrow.

## Cabinet

Cabinet decisions will be sought where required, for example, due to the constitution, where it is a key decision, is wide-ranging, or affects several wards.

## Corporate Leadership Team (CLT)

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The CLT provides oversight and direction to the PSB and ensures the management of the Council's assets is considered corporately.

## Place Strategic Board (PSB)

Assets are a corporate resource and Place Directorate has responsibility for the approval and subsequent monitoring of the CPS.

## Corporate Landlord

The Corporate Landlord brings together key Service contacts with lead responsibility for the asset issues relating to their Service. The function is responsible for the development and delivery of the CPS and development of priority projects.

## Strategic Estates Group

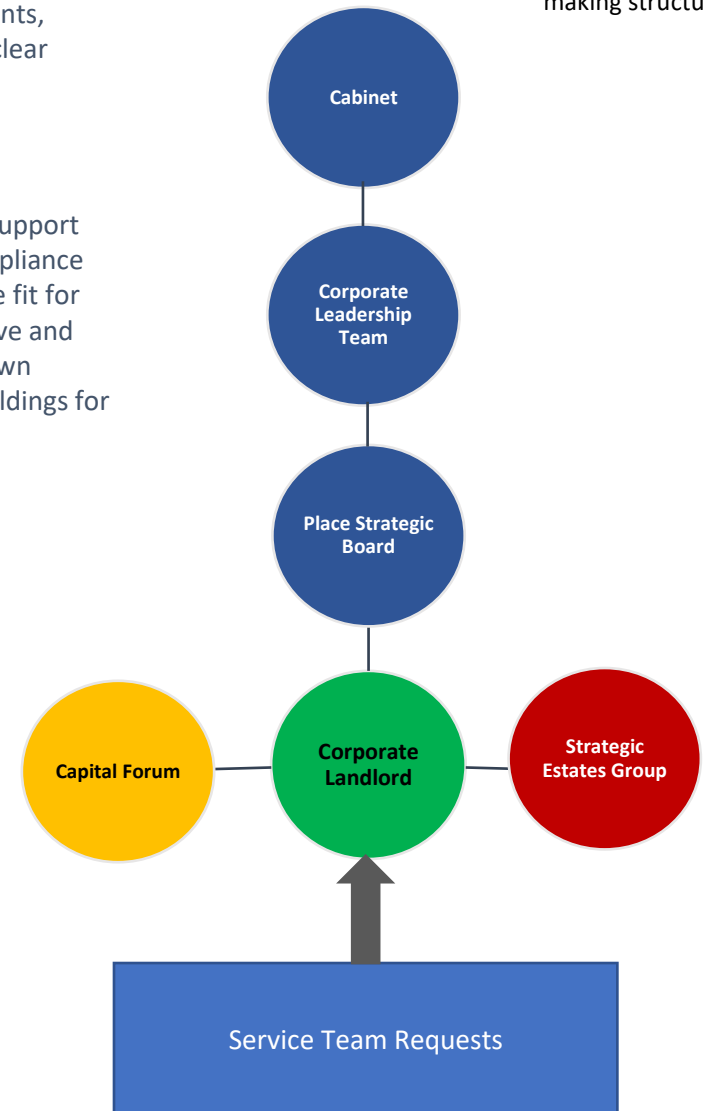
This group would comprise Members and Officers, and act as a forum to discuss specific property plans, requests and requirements, enabling Corporate Landlord to have a clear overview and oversight of future property workstreams.

## Service Responsibilities

The responsibility of each Service is to support the Corporate Landlord function in compliance with this CPS, to ensure these assets are fit for purpose and meet the relevant legislative and other standards for use as well as our own benchmarks for the efficient uses of buildings for operational delivery.



Figure 7: Corporate Landlord decision-making structure





# Sustainability, Climate change and Decarbonisation

## Climate Change Strategy – Impact on our Estate

From our Harrow Property Sustainability Action Plan, there are 5 key improvement areas which will shape the future of our estate.

- To improve the energy efficiency of Harrow’s properties
- To focus on renewable energy and investing in heating networks
- To increase the number of EV charging points
- Drive the importance of sustainability in new developments
- Improve the efficiency of our waste management

As part of our CPS strategy, creating a leaner estate with modern and better utilised buildings will play a key role in the reduction of our carbon footprint. This strategy further supports the wider goals to achieve carbon neutrality by 2030 in redefining town centres and neighbourhoods as low carbon, low pollution economic hubs.

For this CPS, we must ensure that we are investing in energy efficiency improvement (and decarbonisation) projects on the buildings that we know we will be retaining for the future. Our strategy for understanding which buildings will be retained is therefore critical to the plan for improving the energy efficiency of our buildings.

We need improved quantitative data, and energy performance information will be an important element of that data. We will improve how we measure the energy performance of our buildings and relate this to building use data for accurate results. This information will form

part of the strategic decision making process for our estate. That work will need to include identifying leased buildings which fall foul of MEES regulations (preventing a Landlord from leasing the premises).

We have clear biodiversity management and action plans in place. We will flag key land and buildings which are related or form part of those management plans to ensure that future property plans consider the upkeep and biodiversity of our open spaces.

We will build energy performance data into our asset scoring database allowing us to track those properties which require improvement and coordinate future options with the Natural Resources and Climate team.





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# **PART 3 DELIVERY**



## CPS Delivery

Our CPS will not be effective in the future if we cannot deliver results. The contents of the CPS are complex, with many stakeholders and many areas of Harrow Council that are looking for competing outcomes. We want our CPS to become a platform for change so that future strategic work does not need to start from the beginning, but can progress the previous work we have done.

**We will only be able to deliver results to create change through the use of accurate data and frequent management of that data.**

Our assessment tool looks to reflect all opinions and discussions in data form. Our strategic data which will be held and managed by the estates team, will be used to prioritise and direct future property decisions.

We will continue to be service led and undertake follow up discussions with service teams and other stakeholders to fine tune our data records.

We will progress our CPS strategy to create an estate with fewer, higher quality, fit for purpose buildings, and share those buildings where possible. That transformation will be undertaken as part of an agreed methodology to ensure that services are not compromised.

We will work with partners, including the NHS and other public sector bodies, to ensure a co-ordinated and holistic approach to the use of assets, aligning our strategic decision making to serve our residents in locations where services are needed.



## Strategic Actions Areas

- **Regeneration sites.** To produce an options report to determine whether a new path for delivery is appropriate for some of the sites.
- **Governance.** To set up the new Strategic Estates Group to progress our CPS activities.
- **Investment Strategy.** To understand how we can build an investment portfolio which aligns to our economic strategy and our growth sectors.
- **Maintenance Strategy.** To produce condition surveys allowing us to move away from a reactive maintenance regime to a more proactive, planned preventative maintenance strategy. This data is critical in allowing us to understand future building cost.
- **Targeted Disposal Programme.** For those buildings which have not met our criteria for retention and investment, they will form part of a disposal programme to ensure they are delivered on time and achieve targets.
- **Climate Change Strategy.** To ensure our CPS property recommendations align with the energy reduction and decarbonisation projects.
- **Data.** To continue with the procurement of a new property data system which should be able to report on strategic data criteria produced as part of our CPS project.
- **Harrow Branding.** Consider improved branding of land and buildings to improve public awareness and increased use.
- **Partnership Working.** Work with partners to ensure a coordinated and holistic approach to assets across the Borough

## Operational or Property Specific Actions

- **Specific Property Change**– Our CPS provides a new tool for assessing our properties, allowing us to ensure all future property decisions are linked to the longer term strategies discussed in our CPS. We will assess all core properties allowing us to prioritise opportunities, to include important quantitative data (building costs and energy performance information) as well as changing service needs, locations and opportunities. Some properties have already been identified as potentially being not fit for purpose, or having potential to be repurposed or released for disposal or investment. This will be supported by new quantitative data as part of our maintenance strategy.
- **Future Portfolio Placement.** To confirm the future hub strategy and agree those properties which we have suggested might be suitable for future hub facilities. To also discuss consolidation of public facing and corporate functions as part of the hub strategy.
- **Public Sector Partner Mapping.** To plot all public partner property onto our GIS system to understand further potential site sharing opportunities in line with the One Public Estate ethos.
- **Car Parks.** To undertake an occupancy review and consider alternative uses for car parks where appropriate.
- **Open space and minor interests review.** To better categorise and confirm the future purpose for individual open space sites. To progress a strategy for each open space type and consider alternative uses and how those uses collectively support our strategy.

We detail below two specific areas of work – the VCS and Public Health partners.

# Community Buildings

## Summary

The Council work with the Voluntary Community and Social Enterprise (VCSE) sector to deliver a range of services across the Borough. The Council owns Community Buildings whilst HRA Community Halls are managed by the Housing Estate Services Team. There are approximately 26 community buildings owned by the Council in Harrow.

Some community buildings provide income through rental of space, others are currently occupied on a peppercorn basis. The largest community building complex is the Harrow Arts Centre. There is high demand for community space but not all organisations are able to pay a market rent.

Community organisations occupy council owned buildings under various agreements, some paying rent, others receive concessions and of course, many VCSE are not in Council-owned buildings and pay rents to private landlords. The Community Halls are available for short term rental. Some community buildings are in a poor state of repair and some are not fit for purpose. Others have benefited from investment, from both the Council and other funding partners, whilst others remain under-utilised or in need of upgrading (requiring both resources and time) in order to bring them back into use.

## Rocket Science Review

The 2017 review of the VCSE sector '*Strengthening the VCSE sector relationship with the Council*' identified a number of opportunities to improve and enhance the properties from which the VCSE operate from, to create resilient, thriving and connected communities across the borough.

The key findings include:

- Map LBH's current lease agreements and use this to co-design a standard and fair level of support for eligible organisations.
- Levels of subsidy could be granted on the basis of organisation size, annual income and pegged to the extent to which it helps meet the borough's shared strategic objectives.
- Establish longer term lease arrangements for voluntary organisations to enable more local VCSEs to leverage assets to attract additional external funding and investment



- Create and implement a fairer and more transparent lettings policy including standard forms of occupation, from leases to licences, according to the service need, funder's requirements and the Borough's objectives.

## Opportunities

Following a high level review in this Strategic Asset Management Plan, the community buildings score well for operational use, with potential for future investment and/or development.

- A community buildings policy is required to understand how the Council will support and accommodate community organisations. This could be part of the Council and VCSE MOU.
- A community leasing model is required to record and regularise existing occupations.
- A more detailed review is needed to understand what other council space could be used for (or by) community organisations in terms of both their day to day business requirements, and wider partnership working, development and delivery.
- A social value assessment tool could be employed to understand non-financial benefits.

## Collaboration

Many community uses are able to co-locate with other council and other public services. Creating a network of community hub buildings in Harrow may allow a focus for investing in higher quality facilities and offer the release of existing costly, inefficient buildings.



## Public Health

The public health team provide a critical service in ensuring the residents and visitors to Harrow enjoy the best possible health with the resources available. Assessment of Public Health Property Implications.

Often the more intangible elements of public health initiatives can be lost when considering property requirements as they do not often have a direct property use. These criteria can be assessed as part of any property change through social / economic scoring criteria.

Criteria. Property impacts of public health considerations include housing numbers, location and quality, transport, green space and biodiversity, commercial covenants, and others. Many of these are led by planning regulations.

Property Focus. The development of the Family Hubs and Neighbourhood Resource Centres are a key part of the public health focus. This links in closely with adult and children services and other community services.

Collaboration. The NHS Integration Agenda for Northwest London allows the Council a platform for assessing site sharing opportunities. This may result in opportunities for release of unwanted properties. A wider public sector partner collaboration review may be beneficial.

Property Focus. A number of collaboration initiatives include the VCS Swish Project, Conservation Cafes / Warm Hubs and the Stop and Grow Project. There are site sharing opportunities for many different property uses which will be assessed.



NHS colleagues are able to book desks and collaboration space at our new Hub

The CPS is a continuous workstream, to be managed by the corporate landlord function. We will continue to engage with our service teams and all stakeholders to update our requirements throughout the next 5 years. Whilst many of our CPS recommendations require further investigation to understand viability, it is important to forecast overall change for high level planning, which is shown below. This also helps us to prioritise which recommendations to progress first, with the finite resources available to us.

## **0 to 12 Months. To arrange governance, improve data and playback CPS recommendations**

**Activity** - We will set up the Strategic Estate Group and define the roles and responsibilities of attendees. To obtain further quantitative data to improve our property assessment tool. To carry out further engagement / verification with services. To identify a way forward on regeneration sites.

**Property Change** - We will progress some disposals which have no or limited impact on operational activities. This might include self-contained properties or under-used, smaller operational buildings requiring minimal, or no relocation.

## **1 to 3 Years. To build upon our operational knowledge of the estate and assess reconfiguration options**

**Activity** - To obtain car park occupancy information, and a review of the land and minor assets. To build in findings from our Leisure strategy and the existing NHS North West London review. To obtain all public sector mapping and identify site sharing and disposals.

**Property Change** – For those buildings identified as not meeting our criteria for the future, services would be relocated to more suitable premises through site sharing and reconfiguration of the estate.

## **3+ Years. To deliver transformation of the estate through site sharing and disposals**

**Activity** – We will focus on the longer term transformation of the estate, to ensure our building stock meets the needs of Residents.

**Property Change** – Delivery of key regeneration projects, improving the access and setting of our Hub building and continuing our transformation of the estate through considered relocations and the disposal of surplus property.

# Workstream Timetable

	2023	2024	2025	2026	2027
<b>1.0 Strategic Actions</b>					
1.1 Regeneration Sites Refresh Options Report	█				
1.2 Strategic Estates Group Set Up	█				
1.3 Property Data	█				
1.4 Data Management	█				
1.5 Service Team Engagement Playback	█				
1.6 Disposal Programme Set Up and Populate	█	█			
1.7 Harrow Branding		█	█	█	
<b>371 Potential Operational Actions</b>					
2.1 Community Buildings / Leasing Model and Regularisation	█				
2.2 Public Sector Partner Mapping	█	█			
2.3 Car Park Occupancy Review		█	█		
2.4 Open Space and Minor Interests Review		█	█		
2.5 Climate Strategy / Energy Project Alignment		█	█	█	
2.6 Future Portfolio Placement			█	█	
<b>3.0 Property Specific Actions</b>					
3.1 Leisure Strategy		█			
3.2 Community Buildings Site Sharing and VCS Playback		█			
3.3 Car Park Review		█			
3.4 Individual Disposals			█	█	█

The actions which we have agreed as part of our CPS must be implementable with the resources we have available. Our CPS has been designed to be managed in house although it is likely that we will need external expertise to progress certain work streams. We will ensure that our corporate landlord team has the right level of resources to manage these activities.

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**Report for: Cabinet**

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<b>Date of Meeting:</b>	27 July 2023
<b>Subject:</b>	Disposal of two freehold council interests: 105 Eastcote Lane, HA2 8RN and 2 Hermitage Cottages, HA7 3JW
<b>Key Decision:</b>	Yes
<b>Responsible Officer:</b>	Dipti Patel – Corporate Director, Place
<b>Portfolio Holder:</b>	Cllr Norman Stevenson - Portfolio Holder for Business, Employment and Property;  Cllr David Ashton - Portfolio Holder for Finance and Human Resources.
<b>Exempt:</b>	Part exempt - Appendix A contains information relating to the financial or business affairs of the Council – Paragraph 3, Schedule 12A Local Government Act 1972
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	Roxeth, Stanmore.
<b>Enclosures:</b>	Appendix A

## Section 1 – Summary and Recommendations

This report recommends the sale of the following two General Fund freehold interests at:

- 105 Eastcote Lane, HA2 8RN; and
- 2 Hermitage Cottages, HA7 3JW.

The two properties have been identified as being surplus to the Council's service needs. The costs of bringing the properties back into use are significant. They are no longer economically viable and there is no alternative use identified at a lesser cost. The proceeds from the sales of these properties will contribute to the capital receipt requirement in the three year MTFs and Capital Programme. A full open marketing exercise will be undertaken to ensure best value is achieved and the council complies with its fiduciary duties.

### **Recommendations:**

Cabinet is requested to:

- 1) Declare that the two properties are surplus to the Council's requirements.
- 2) Delegate authority to the Corporate Director of Place, in consultation with the Portfolio Holder for Business, Employment and Property, to market the properties, negotiate terms and approve the final terms of the disposals, and to enter into the contract and any associated documentation in connection with the disposals, subject to the sale of each property being on the basis of best consideration reasonably obtainable.
- 3) Delegate authority to the Corporate Director of Place, in consultation with the Portfolio Holder for Business, Employment and Property, to procure specialist agents to market the properties where required.

**Reason (for recommendations):** The disposals are recommended as the properties are deemed surplus to the Council's service needs. Their sale will reduce the ongoing revenue cost burden as well as providing a capital receipt.

## Section 2 – Report

### 1. Introductory paragraph

- 1.1 The new Corporate Property Strategy (also being discussed at Cabinet in July 2023) provides much needed strategic direction, providing a platform for decision making, both to retain buildings, and when

required, to release buildings through a targeted disposal programme. The Council needs to modernise its buildings to ensure they are fit for purpose and energy efficient. We cannot afford to invest in all our buildings, and we will need to reduce the size of our estate, ensuring we retain buildings in the right locations, which are efficient to run, to deliver crucial services to residents. To achieve this, we will release costly and inefficient buildings and use the savings and receipts to reduce the burden of our taxpayers and invest in our existing estate.

- 1.2 In identifying a first set of potential disposals, priority has been given to:
- Vacant, non-income producing assets
  - Assets which have the potential for more intensive use/redevelopment through the planning system, and therefore the recycling of capital receipts from sales of underperforming assets into existing but better performing assets.

## **2. Ward Councillors' comments**

- 2.1 To date, two ward councillors from Stanmore and one ward councillor from Roxeth have responded supporting the disposals.

## **3. Options considered**

### **Option 1: Do Nothing.**

- 3.1 The properties are currently vacant and will continue to deteriorate. In addition, the Council is incurring holding costs in terms of security and outgoings and the opportunity cost.

### **Option 2: Refurbish and utilise for service delivery**

- 105 Eastcote Lane
- 3.2 A former 3 bed Adult social care house, this property has been vacant for at least two years and requires complete modernisation. Set back from two adjoining terraces (which have been sold off under right to buy), the house is located on a long narrow plot. To the side of the house is a drive leading to a parking area to the rear with two small parking 'plots' which have been sold to the adjoining terraced houses, so the strip of land contains a permanent right of way. This area, however, is overgrown and fly tipped.
- 3.3 The property would require capital expenditure to bring it up to modern standards, but has potential for additional development (for example, roof and rear extensions, subject to planning/permitted development confirmation), which the council is unlikely to realise.
- 2 Hermitage Cottages
- 3.4 An attractive two bed semi-detached 'gingerbread' style cottage (with large garden) set in the grounds of the adjoining Bentley Wood High

School. The property has been vacant for several years after the previous occupant left. The property requires complete modernisation including installing central heating. The adjoining property has been sold freehold under right to buy. The house is accessed through a gate along a relatively long, private gated drive. The house requires a significant amount of capital expenditure to bring it up to modern standards.

- 3.5 There are other residential properties which are likely to come forward in the near future which are more suitable for Temporary Accommodation – a recent example is a former caretaker’s house (which became available due retirement) which required minimal works and has now re-housed a homeless family.

### **Option 3: Dispose of the properties on the open market**

- 3.6 Sell the properties on the open market through private treaty or auction. The Council will procure marketing advice from property agents to ensure the properties are sold in the most appropriate way for the market conditions and types of asset. The proceeds from the sales of these properties will contribute to the capital receipt identified in the Medium-Term Financial Strategy (MTFS) for 23/24. Proceeding with this option will form a vital part of the future capital investment in the borough including reinvesting the capital proceeds in new, fit for purpose accommodation. This is considered the most cost-effective approach and is the recommended option.
- 3.7 Whilst Option 3 is recommended, this is on the basis that a sale represents the best consideration reasonably obtainable. A decision will be taken on a site-by-site basis.

## **4. Risks**

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

4.2 Separate risk register in place? **No**

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

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

<b>Risk Description</b>	<b>Mitigations</b>	<b>RAG Status</b>
If the recommendation(s) of the report are not agreed, anticipated revenue savings and capital receipts (to be re-invested in the Council’s estate) that are identified	<ul style="list-style-type: none"> <li>▪ Agreement to the report’s proposed recommendation(s) will mitigate this risk</li> </ul>	<b>GREEN</b>

Risk Description	Mitigations	RAG Status
for the MTFS for 23/24 would not materialise		
Sales will not complete due to proposed buyers failing to proceed with the purchase.	<ul style="list-style-type: none"> <li>▪ Undertaking due diligence on the buyer prior to seeking authority to dispose and ensuring that provisional Heads of Terms are agreed.</li> <li>▪ Maintaining competitive tension throughout and/or securing buyer 'tie-in' through non-refundable deposits etc.</li> </ul>	<b>AMBER</b>
Reduction in receipts owing to a downturn in market conditions/values	<ul style="list-style-type: none"> <li>▪ Acceleration of the programme so that where anticipated receipts are significantly below expectations, alternative options are considered</li> </ul>	<b>AMBER</b>
Delay in a disposal owing to an unforeseen serious defect with the asset or title such that it cannot be resolved within the financial period.	<ul style="list-style-type: none"> <li>▪ Commence pre-marketing due-diligence, including legal searches as soon as possible.</li> </ul>	<b>AMBER</b>

## 5. Procurement Implications

- 5.1 The disposal programme will largely be delivered by existing Council resources in Corporate Estates, working closely with Legal and Finance. However, some activities will need to be provided by external property consultants including the preparation of due diligence and marketing packs in order to meet the desired timescale. Any external property consultants will be procured in accordance with the Council's Contract Procedure Rules.

## 6. Legal Implications

- 6.1 Pursuant to S.123 of the Local Government Act 1972 the Council has the power to dispose of land in any manner it wishes, subject to certain provisions. The Council has the statutory duty to obtain the best price reasonably obtainable subject to certain exemptions.
- 6.2 When considering the duty under section 123, what is reasonably obtainable in any particular case depends entirely on the facts of the transaction. Case law has determined that whilst there is no absolute requirement to market the land or obtain an independent valuation, if valuation evidence is obtained, it should be up to date and that there

should not have been any material and significant changes in circumstances since it was obtained. In addition, obtaining proper professional advice throughout the process on how to maximise its receipts is a material consideration and the Council should limit itself to taking account of those elements of a transaction which are of commercial or monetary value and should disregard irrelevant factors such as “job creation” when assessing whether it is obtaining the best consideration reasonably obtainable. The deliverability or credibility of a bid are commercial factors which are relevant to an assessment.

- 6.3 A report on title will be commissioned in relation to each asset to ascertain whether there are any impediments to the disposal of the asset.
- 6.4 The proposal is to dispose of the freehold title of the sites. If it is intended for the site to be developed and the Council disposes of the freehold title, it will no longer have control over its use as landowner. Any future development will be subject to planning permission, as required. Consideration will be given to whether an overage clause would be appropriate in the sale contract. Overage is a means by which a seller can receive additional funds after the sale has been completed if an agreed event takes place, for instance the value of the property increases within a set period of time.

## 7. Financial Implications

- 7.1 The 2023/24 MTFS assumes revenue savings from the application of capital receipts to fund the Capital Programme as well as transformational costs under Capital Receipts Flexibility Scheme. These are summarised in the table below.

	2023/24	2024/25	2025/26
	£'000	£'000	£'000
Applying capital receipts to fund the Capital Programme	-1,700	-1,300	-1,300
Capital Receipts Flexibilities	-1,250	0	1,250

- 7.2 The Council is currently holding a number of accrued capital receipts (£4.5m) and will receive a further sum estimated at £15.4m from the sale of properties at Leefe Robinson Mews (formerly known as Haslam House) and Pinnora Mews (formerly known as Waxwell Lane Car Park). The capital receipts in hand and those due will be used to fund short life assets in the Capital Programme and will realise revenue savings against the capital financing budget over the three years of the MTFS.
- 7.3 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 reform projects. The

flexibility has been extended on numerous occasions and is currently in place until 31 March 2025.

- 7.4 The 2023/24 MTFs assumes that the cost of Regeneration Team of £1.250m is funded under the Scheme because the nature of this spend meets the capital flexibility criteria. This sum is re-instated in 2025/26 when the Scheme is currently intended to end. Therefore, the first call on the capital receipts generated through this report will be used to support this.
- 7.5 These properties are currently vacant, so there is no loss of rental income from the disposal. The proposed disposals will also reduce the on-going revenue cost burden in General Fund such as council tax of around £12k per annum.

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

- 8.1 The properties will be openly marketed. All opportunities to promote equality are addressed through an open marketing process (e.g. signboards, information on the LB Harrow website, agents' websites etc). Moreover, the proceeds will be reinvested in the Council's capital programme which includes programmes and schemes which will improve the prospects for people across the Borough. Whilst the sites were historically used for specific service users, the properties are not considered suitable for continued use and it is considered that it would be better both financially and practicable to sell the assets and invest in other buildings or uses.

## **9. Council Priorities**

### **A place where those in need are supported**

- 9.1 Sales receipts will contribute to our capital programme which will help create better spaces for our most vulnerable residents.

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

**Statutory Officer: Dawn Calvert**  
Signed by the Chief Financial Officer  
4 July 2023

**Statutory Officer: Amanpreet Lally**  
Signed on behalf of the Monitoring Officer  
4 July 2023

**Chief Officer: Dipti Patel**  
Signed by the Corporate Director  
4 July 2023

**Head of Procurement: Nimesh Metha**

Signed by the Head of Procurement

3 July 2023

**Head of Internal Audit: Neale Burns**

Signed on behalf of the Interim Head of Internal Audit

29 June 2023

**Has the Portfolio Holder(s) been consulted? Yes**

## **Mandatory Checks**

**Ward Councillors notified: Yes**

**EqIA carried out: No**

As the properties will be openly marketed, this minimises any potential for discrimination or negative impact and all opportunities to promote equality are addressed through an open marketing process (e.g. signboards, information on the website, agents etc.).

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

**Contact:** Sophie Linton, Estates Manager,

[Sophie.Linton@harrow.gov.uk](mailto:Sophie.Linton@harrow.gov.uk)

**Background Papers:** None

**Call-in waived by the Chair of Overview and Scrutiny Committee - NO**





**Report for: Cabinet**

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<b>Date of Meeting:</b>	27 July 2023
<b>Subject:</b>	Electoral Print Contract
<b>Key Decision:</b>	Yes
<b>Responsible Officer:</b>	Jessica Farmer - Interim Director of Legal and Governance Services
<b>Portfolio Holder:</b>	Councillor Stephen Greek - Portfolio Holder for Performance, Communications and Customer Experience  Councillor David Ashton - Portfolio Holder for Finance and Human Resources
<b>Exempt:</b>	No, except for appendices 1,2,3,4,5,6,6A, 6B which are exempt by virtue of Paragraph 3 of Schedule 12A of the Local Government Act 1972 because they contain information relating to the financial and business affairs of the Council
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All
<b>Enclosures:</b>	<b>Appendix 1</b> Declaration (Exempt) <b>Appendix 2</b> SQ Scoring Methodology (Exempt) <b>Appendix 3</b> ITT Document Electoral Print (Exempt) <b>Appendix 4</b> Electoral Print Specification (Exempt) <b>Appendix 5</b> Draft Framework agreement (Exempt) <b>Appendix 6</b> Electoral Print Price Schedule (Exempt) <b>Appendix 6A</b> Electoral Print Price Schedule (Exempt) <b>Appendix 6B</b> Electoral Print Price Schedule (Exempt)

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

This report sets out proposals for the Council to enter into a Framework Agreement jointly with the London Borough of Barnet for the provision of Electoral Services printing and postage requirements for a period of 3 years, with an option to extend for a further year. Electoral printing is highly specialised, therefore it has typically been arranged separately to the Council's main printing contracts.

### **Recommendations:**

Cabinet is requested to:

1. Approve the re-procurement of a Framework Agreement jointly with the London Borough of Barnet (or by Harrow alone if Barnet does not proceed) for the provision of Electoral Services printing and postage requirements for a period of 3 years, with an option to extend for a further year.
2. Approve the tender documents.
3. Delegate authority to the Interim Director of Legal and Governance, following consultation with the Portfolio Holder for Performance, Communications & Customer Experience, and the Portfolio Holder for Finance & Human Resources, to make any necessary changes to the tender documents following approval.
4. Delegate authority to the Interim Director of Legal and Governance to appoint providers to the Framework and to award call-off contracts from the Framework.

### **Reason:**

Entering into a framework agreement will provide clear and robust arrangements for:

- The 'best in class' levels of value-for-money, quality assurance, resilience and supplier service for its electoral print and postage requirements.
- Obtaining and awarding print and postage contracts for appropriate electoral services activities.
- A solution which efficiently supports and facilitates compliant electoral processes and the management and delivery of future elections and other electoral activities within the borough.

## **Section 2 – Report**

### **Introduction**

Harrow currently has over 95,000 residential properties on the Electoral Register with 191,000 registered voters and of these, over 38,000 are currently registered to receive a postal vote.

## Background

1. In March 2019 the Council established a Framework Agreement jointly with the London Borough of Barnet for the provision of Electoral Services printing and postage requirements for a period of 3 years, with an option to extend for a further year. This procurement was facilitated and led by the London Borough of Barnet.
2. The Framework was entered into as electoral printing is highly specialised with only a limited number of suppliers able to provide the service and hence it has typically been arranged separately to the council's main printing contracts.
3. The framework lot structure is detailed in the table below:

Lot No.	Description
Lot 1	Elections Print and Post
Lot 2	Statutory Registration, Annual Canvass, Household Notification Letters (HNL)
Lot 3	Innovation, New Ways of Working and Ad Hoc Activity

4. These services procured from the Framework ensure the continued provision of:
  - Clear and robust arrangement for requesting, obtaining and awarding print and postage contracts for appropriate electoral services activities;
  - A solution which efficiently supports and facilitates compliant electoral processes and the management and delivery of future elections and other electoral activities within the borough; and
  - Value-for-money, quality assurance and supplier service for electoral print and postage requirements.
  - The service will meet the specific print and postage needs of any elections that are held within the contract period and the requirements of the Electoral Registration Service, to include Individual Electoral Registration, the Annual Canvass and the Absent Vote Identifier Refresh as well as any changes implemented as a result of the Elections Act.
5. Electoral Service requirements will include:
  - All borough-wide elections (including but not limited to: Parliamentary, Local, London Mayoral and GLA, Referendums, etc.);
  - Individual Electoral Registration (IER) and Annual Canvass , Household Notification Letters requirements;

- Absent Voter Identifier Refresh requirements; and
  - Other ad hoc requirements that may arise and also result from technology innovation or legislative changes.
6. The overall demand for this service can be affected by snap elections.

## **Current situation**

7. In April 2023 the Council directly awarded a call off contract to Civica Election Services under the framework for all the Council Electoral Print requirements for a period of 6 months with the option to extend a further 6 months at the discretion of the Council. This temporary arrangement was agreed to allow the council to maximise the benefits from the existing agreement and allow time for a service review, governance process and facilitate the tender of a replacement framework.
8. This report is to seek agreement to re-procure a Framework Agreement jointly with the London Borough of Barnet for the provision of Electoral Services printing and postage requirements for a period of 3 years, with an option to extend for a further year. The proposed Framework agreement will cover any printing requirements as a result of the implementations of the Elections Act (i.e the new format of the Poll Card).

## **Environmental Implications**

9. Any identified suppliers to the Framework will be required to demonstrate their commitment to the London Borough of Harrow's target to be carbon neutral by 2030.

## **Data Protection Implications**

10. Any identified suppliers to the Framework will be required to sign a Data Sharing Agreement with the Authority.

## **Risk Management Implications**

11. Risks included on corporate or directorate risk register? - Yes
12. Separate risk register in place? - No
13. The relevant risks contained in the register are attached/summarised below. The following key risks should be taken into account when agreeing the recommendations in this report:

Risk Description	Mitigations	RAG Status
The existing services provided by Civica Election Services will cease on 30th October 2023, before a replacement framework is live.	<p>The existing services contract contains a 6-month extension option for the continuation of service up to 29/04/2024.</p> <p>A project and evaluation team will be formed by officers from both Councils to oversee the award of the tender and will review timelines every two weeks when meeting to ensure relevant deadlines are met</p>	<b>Green</b>
Unsuccessful or delayed procurement process causing a gap in service delivery	<p>The existing services contract contains a 6-month extension option for the continuation of service up to 29/04/2024.</p> <p>A project and evaluation team will be formed by officers from both Councils to oversee the award of the tender and will review timelines every two weeks when meeting to ensure relevant deadlines are met</p>	<b>Green</b>

## Procurement Implications

14 The previous joint framework is seen as successful and therefore agreement is sought to continue this working arrangement.

14.1 In August 2023, it is proposed The London Borough of Harrow on behalf of itself and the London Borough of Barnet will issue an Invitation to Tender (ITT) to all interested organisations as set out in the Public Contracts Regulations 2015. A project and evaluation team has been formed by officers from both Councils.

14.2 On 9th May 2023, a Prior information notice (PIN) was issued on the Find a Tender service to notify the market of the upcoming procurement (prior information only). The intention of the PIN is to warm the market and ensure a good tender response.

14.3 The Council would conduct the procurement using an open procedure as set out in the Public Contracts Regulations 2015, as amended (the "Regulations") for the purpose of procuring the Supplies & Services described in the Specification. The value of the service is expected to be above financial

thresholds for Supplies & Services and will be advertised and tendered via the London Tenders Portal with the appropriate UK Notices.

## **Options considered**

**Option 1: To not replace the expired Framework and continue with the current supplier of the Printing and Mailing Services detailed in this report.**

This means the Council would purchase these services on a spot basis after the current arrangements expire, leaving the Council open to potential challenge by not meeting its obligations regarding the selection of suppliers and the award of contracts.

**Option 2: Use of an external “Print Services” Framework to facilitate a further competition to procure Printing and Mailing Services.**

This means the Council would facilitate a further competition with pre-appointed providers, awarded onto a Framework owned and managed by an external organisation. Using an external framework would limit the Council's ability to tailor the service to its requirements and standards.

There would also be associated framework fees potentially increasing the service cost when using an external framework.

**Option 3: To procure a replacement Framework**

A Framework owned by the Council will allow for alternate organisations to be awarded if the lead provider is unable to meet its obligations, in addition to allowing for future innovation on Lot 3. It would also allow the continued partnership with The London Borough of Barnet in relation to these services.

**Option 3a: To procure a replacement Framework following the “Restricted Procedure” to facilitate a full tender exercise.**

This means the council would issue an ITT and Selection Questionnaire (SQ) on the London Tenders Portal allowing 30 days (minimum) for response.

Stage 1: SQ responses would be submitted, assessed and a set number of the highest ranked organisations who meet the specified criteria would be invited to Tender and allowed an additional 25 days (minimum) for response.

Stage 2: Tender responses would then be submitted, assessed and an award recommendation would be made.

This option is seen as unnecessary and will elongate the procurement process.

**Option 3b: To procure a replacement Framework following the “Open Procedure” to facilitate a full tender exercise.**

This means the council would issue an ITT and SQ on the London Tenders Portal allowing 30 days (minimum) for response.

The SQ and Tender responses would then be submitted and assessed in a single stage.

Following the “Open Procedure” to facilitate a full tender exercise is the preferred option. Electoral print is a specialist market, and few organisations can meet the necessary requirements of the larger print market. The previous tender to establish a Framework for these services in 2018 received a total of 12 expressions of interest and 5 tender submissions.

**Option 3 and 3b** are seen as the preferred Options to procure these services.

The top-level evaluation criteria will be:

**Price 30%**

There is healthy competition within the Electoral Print market and 30% weighting for price is seen as sufficient for achieving value for money. The prices contained in the Pricing Matrix will be fixed for the duration of the contract term.

**Quality 60%**

Quality is regarded as the key criteria for these services and has been allocated 60% of the overall score. This is due to the necessity of having a secure, resilient, and reliable supplier base for the Councils Electoral Print supply.

**Social Value 10%**

As required by council policy 10% of the weighting has been allocated to Social Value.

Appendix 1 of this report contains the proposed draft tender documents.

## **Legal Implications**

15 The ERO has a statutory duty to maintain a register of Parliamentary electors and a register of local government electors.

15.1 The RO is responsible for the running of an election and for ensuring that it is run in accordance with the law.

The proposed Framework Agreement will provide the necessary quality and assurance to ensure that the ERO and RO is in the best possible position to deliver their statutory electoral obligations.

15.2 A fair and transparent procurement procedure in compliance with public procurement rules is being followed to procure suppliers for Electoral Services printing and postage requirements.

15.3 HB Public Law will provide Harrow and Barnet with legal advice as required during the entire procedure from its conception and will continue to provide advice and support up until a contract is agreed and implemented.

## **Financial Implications**

16. Funding for UK Parliamentary Elections and Referenda is provided by the Government. Funding for Greater London Authority Elections is provided by Greater London Authority. However, funding for Local Government Elections and the maintenance of the electoral register must be met from Council resources. The value of the contract to be awarded via this Framework Agreement must be contained within the existing budget of Electoral Services.

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

17. There are no equalities implications from the proposal as it relates to the selection of successful bidder(s) for Electoral Services printing and posting requirements

## **Council 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**

The proposed agreement if implemented will contribute towards all of the Council's Priorities by seeking to achieve robust and reliable printing and postage requirements for Electoral Services. Elections provide residents with the opportunity to vote for democratically elected representatives who provide the political leadership for the Corporate Priorities.

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

### **Statutory Officer: Sharon Daniels**

Signed on behalf of the Chief Financial Officer

**Date: 20/06/2023**

### **Statutory Officer: Stephen Dorrian**

Signed on behalf of the Monitoring Officer

**Date: 19/06/2023**

### **Chief Officer: Jessica Farmer**

Signed off by the Corporate Director



**Date: 19/06/2023**

**Procurement Officer: Martin Trim**

Signed on behalf of the Head of Procurement

**Date: 21/06/2023**

**Head of Internal Audit: Neale Burns**

Signed on behalf of the Interim Head of Internal Audit

**Date: 21/06/23**

**Has the Portfolio Holder(s) been consulted? Yes**

## **Mandatory Checks**

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

**EqlA carried out: NO - there are no equalities implications.**

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

**Contact:** Vishal Seegoolam, Democratic, Electoral and Registration Services Manager, 020 8424 1158,  
[Vishal.Seegoolam@harrow.gov.uk](mailto:Vishal.Seegoolam@harrow.gov.uk)

**Background Papers:**

- [Report Submitted to Cabinet on 17 January 2019 Electoral Print Contract](#)

**Call-in waived by the Chair of Overview and Scrutiny Committee - NO**

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**Report for: Cabinet**

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<b>Date of Meeting:</b>	27 July 2023
<b>Subject:</b>	Revenue and Capital Budget 2022-23 – Final Outturn
<b>Key Decision:</b>	Yes
<b>Responsible Officer:</b>	Dawn Calvert - Director of Finance and Assurance
<b>Portfolio Holder:</b>	Councillor David Ashton - Portfolio Holder for Finance and Human Resources
<b>Exempt:</b>	No except for Appendix 5 which is exempt on the grounds that it contains “exempt information” under paragraph 3 of Part I of Schedule 12A to the Local Government Act 1972 (as amended) in that it contains information relating to the financial or business affairs of any particular person (including the authority holding that information).
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All
<b>Enclosures:</b>	Appendix 1 – Summary of Grants 2022-23 Appendix 2 – Summary of Revenue Carry Forwards 2022-23 Appendix 3 – Capital Programme 2022-23 Appendix 4 – Trading Company Update 2022-23 Appendix 5 – EXEMPT – Addition to the HRA Capital Programme

## Section 1 – Summary and Recommendations

This report sets out the Council's final revenue and capital outturn position for 2022-23

### Recommendations:

1. That Cabinet notes the revenue and capital outturn positions set out in paragraphs 1.2 to 1.6.
2. That Cabinet approve the proposed additions and amendments to the Capital Programme as set out in paragraphs 3.39 to 3.44 and Appendix 5 (EXEMPT)
3. That Cabinet note the Council's Trading Update as detailed in Appendix 4.

### Reason: (For recommendations)

To report the 2022-23 financial forecast position and to update Cabinet on trading company performance.

## Section 2 – Report

### 1.0 INTRODUCTION

- 1.1 This is the final budget monitoring report for 2022-23.
- 1.2 At the start of the financial year there was a planned draw down from reserves of £14.711m built into the 2022-23 budget.
- 1.3 The final outturn on the revenue budget for 2022-23 is an overspend of £5.842m which, after draw down from reserves, cross divisional adjustments and carry forwards, is reduced a balanced position.
- 1.4 The final overspend of £5.842m means that the balance of £8.869m, not required to be drawn down from reserves in 2022-23, will remain on the balance sheet and support the Council's financial sustainability moving forwards.
- 1.5 The final general fund capital programme budget in 2022-23 is £103.307m. The net outturn position on the capital budget at the end of the financial year is £25.388m which represents 25% of the total capital programme budget. The variance of £77.919m is made up of slippage of £74.436m and an underspend of £3.484m.
- 1.6 The Housing Revenue Account (HRA) capital programme budget is £52.854m. The final outturn position on the HRA capital budget at the end of the financial

year is £14.989m which represents 28% of the total HRA capital programme budget. The variance of £37.866m is made up of slippage of £24.357m and a net underspend of £13.508m.

## 2.0 REVENUE MONITORING

2.1 The revenue outturn position is balanced following transfer from reserves. The summary of the outturn by each directorate is set out in Table 1.

**Table 1: Summary of Revenue Budget Monitoring – final outturn 2022-23**

Service Area	Revised Budget	Outturn	Variance	Contribution/ Drawdown/ From reserves	Cross Divisional Adjustments	Carry Forwards	Use of one off funding / management actions	Revised Outturn	Variance to budget	Draw down final reserve	Variance to budget
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Chief Executive	19,022	17,251	-1,771	-415	0	300	0	17,136	-1,886		-1,886
Resources	20,752	22,450	1,698	-1,660	-48	192	0	20,934	182		182
Place	32,308	28,307	-4,001	7,993	-496	492	0	36,296	3,988		3,988
People's Services	106,973	105,568	-1,405	1,697	400	0	-575	107,090	117		117
<b>Total Directorate Budgets</b>	<b>179,055</b>	<b>173,576</b>	<b>-5,479</b>	<b>7,615</b>	<b>-144</b>	<b>984</b>	<b>-575</b>	<b>181,456</b>	<b>2,401</b>	<b>0</b>	<b>2,401</b>
Corporate	4,555	3,743	-812	-60	0	0	0	3,683	-872		-872
Contingency for Unforeseen	1,248	0	-1,248	0	0	0	0	0	-1,248		-1,248
Technical	5,720	28,716	22,996	-18,226	0	413	0	10,903	5,183	-5,842	-659
Investment Properties	-2,876	-3,022	-146	146	0	0	0	-2,876	0		0
Pay Inflation	-4,928	0	4,928	0	0	0	0	0	4,928		4,928
Non-Pay Inflation	2,750	0	-2,750	0	0	0	0	0	-2,750		-2,750
MTFS Growth held centrally	1,800	0	-1,800	0	0	0	0	0	-1,800		-1,800
<b>Total Corporate Budgets</b>	<b>8,269</b>	<b>29,437</b>	<b>21,168</b>	<b>-18,140</b>	<b>0</b>	<b>413</b>	<b>0</b>	<b>11,710</b>	<b>3,441</b>	<b>-5,842</b>	<b>-2,401</b>
Uncontrollable Budgets	-4,039	-4,039	0	0	0	0	0	-4,039	0	0	0
<b>Grand Total</b>	<b>183,285</b>	<b>198,974</b>	<b>15,689</b>	<b>-10,525</b>	<b>-144</b>	<b>1,397</b>	<b>-575</b>	<b>189,127</b>	<b>5,842</b>	<b>-5,842</b>	<b>0</b>

## CHIEF EXECUTIVE

**Table 2: Chief Executive Final Outturn 2022-23**

Division	Budget	Outturn	To/ (From) Reserves	Carry Forwards	Revised Forecast	Variance to budget
	£0	£0	£0	£0	£0	£0
Finance & Insurance	3,493	3,649			3,649	156
Revenues & Benefits	9,459	8,781			8,781	-678
Procurement	712	664	0		664	-48
Internal Audit/CAFT	670	560	0		560	-110
Legal & Governance	4,419	3,289	-415	300	3,174	-1,245
CEO	270	309			309	39
<b>Totals</b>	<b>19,023</b>	<b>17,252</b>	<b>-415</b>	<b>300</b>	<b>17,137</b>	<b>-1,886</b>

2.1 At the end of the financial year the directorate is reporting a net underspend of £1.886m after draw down from reserves and adjustment for carry forwards.

2.2 The reserve movements are shown in Table 3

**Table 3: Chief Executive Reserve Movements 2022-23**

Description	Movement £'000
Borough Election	-415
<b>Chief Executive net draw down</b>	<b>-415</b>

2.3 The net underspend of £1.886m is mainly made up as follows:

- **Legal & Governance** - £1.245m net underspend due to £241k additional income in Registration Services, £216k delayed recruitment in Democratic Services and £788k increase in demand for Legal Services
- **Internal Audit/CAFT** - £110k underspend due to delayed recruitment
- **Revenues & Benefits** - £678k underspend due to £586k New Burdens funding in Revenues and £81k underspend in Benefits due to delayed recruitment and additional grant income

2.4 This is partially offset by pressures as follows:

- **Finance & Insurance** - £156k net overspend due to loss of insurance income from schools £219k offset by various other underspends across the service £63k
- **CEO** - £39k net overspend

## RESOURCES

**Table 4: Resources Outturn 2022-23**

Division	Budget	Outturn	To/ (From) Reserves	Carry Forwards	Revised Outturn	Variance to budget
	£0	£0	£0		£0	£0
Business Support	4,443	4,595	0		4,595	152
Management	554	969	-426		543	-11
Strategy	2,134	2,300	-338	141	2,103	-31
ICT	7,617	7,438	-55	51	7,434	-183
Access Harrow	4,001	4,215	-150		4,065	64
HR	2,005	2,934	-739		2,195	190
<b>Totals</b>	<b>20,754</b>	<b>22,451</b>	<b>-1,708</b>	<b>192</b>	<b>20,935</b>	<b>181</b>

2.5 At the end of the financial year the directorate is reporting a net overspend of £181k.

2.6 The reserve movements are shown in Table 5

**Table 5: Resources Reserve Movements 2022-23**

Description	Movement £'000
Business Risk Reserve	-255
Capacity Build/ Transformation Reserve	-1,238
Accommodation Strategy Reserve	-91
Equalities Diversity & Inclusion Reserve	-76
<b>Resources net draw down</b>	<b>-1,660</b>
Corporate Funding	-48
<b>Resources total draw downs</b>	<b>-1,708</b>

2.7 The net overspend of £181k is made up as follows:

- **Access Harrow** – £64k net overspend due to the decision to not implement a prior year MTFs saving to close the telephone lines for Revenues and Collections.
- **HR** - £190k net overspend due to loss of income from schools for Payroll services
- **Business Support** - £152k net overspend due to loss of schools income and additional work carried out for Harrow Helpline and Access Harrow
- **IT** - £183k net underspend mainly due to contract underspends
- **Various underspends** - £42k across the directorate mainly related to loss of income in Business Support

## PLACE

**Table 6: Place Outturn 2022-23**

Division	Budget	Outturn	To/ (From) Reserves	Cross divisional adjmt	Revised outturn	Variance to budget
	£000	£000	£000	£000	£000	£000
Directorate Management	2,919	4,035	0	0	4,035	1,116
Environment	17,743	16,443	541	-189	16,795	-948
Inclusive Economy Leisure & Culture	4,055	4,503	-97	0	4,406	351
Regeneration & Development	3,584	-529	7,672	-38	7,105	3,521
Housing General Fund	4,007	4,347	-123	-269	3,955	-52
<b>Total Budget</b>	<b>32,308</b>	<b>28,799</b>	<b>7,993</b>	<b>-496</b>	<b>36,296</b>	<b>3,988</b>

2.8 As at the end of the financial year the directorate is reporting a net overspend of £3.988m after draw down from reserves and cross-divisional adjustments.

2.9 Of this, £2.450m relates to energy and fuel cost pressures due to the recent surges in the unit price of electricity, gas, and fuel. This has been funded by the non-pay inflation budget of £2.75m which is held corporately.

2.10 The reserve movements are shown in Table 7

**Table 7: Place Reserve Movements 2022-23**

Description	Movement £'000
Capital Feasibilities Reserve	-15
3G Pitch	25
Waste Strategy	1,595
1 Hour Free Parking	-405
Business Risk Reserve	-648
Capacity Build/ Transformation Reserve	-107
Revenue Grant Reserve	-444
CIL	7,631
CIL Mayor	42
Property Acquisition Programme Sinking Fund	319
<b>Place net draw down</b>	<b>7,993</b>
Corporate Funding	496
<b>Place total draw down</b>	<b>7,497</b>

2.11 The net overspend of £3.988m is set out in the following paragraphs

2.12 **Directorate Management** – £1.116m net overspend. The legacy of the COVID-19 pandemic continued to have an impact on the directorate’s ability to generate income. As part of the MTFs process, budget growth of £2.482m was allocated to recognise this impact and help mitigate against any such losses. However the loss of income was £1.070m greater than the growth allocation. In addition, there was a £45k pressure in relation to recruitment costs.

2.13 **Environment** - £948k net underspend. This is made up as follows:

- **Fuel & Energy** - £1.179m net overspend funded by centrally held non-pay inflation budget
- **Waste Disposal** - £990k net underspend. This is due to favourable market conditions during the first half of the financial year which resulted in lower disposal costs for dry recyclables
- **Network Management** – net underspend £521k due to additional income from street works activity
- **Trade Waste** – net underspend £150k due to additional income
- **Staffing** – net underspend £643k due to vacant posts across various service areas
- **Transport** – net overspend £87k on vehicle running costs due to additional repairs on aged vehicles.

2.14 **Inclusive Economy, Leisure and Culture** - £351k net overspend.

- **Fuel & Energy** – £279k net overspend
- **Cultural Services** – £187k net overspend due to business rates and service overhead costs of £113k at Harrow Arts Centre and service overhead costs of £74k at Harrow Museum.
- **Economy** - £115k net underspend due to fewer requests on ward priority fund budget £75k and underspends in relation to vacant posts £40k.



## 2.15 Regeneration and Sustainable Development - £3.521m net overspend

- **Fuel & Energy** - £992k net overspend
- **Facilities Management** – £815k net overspend
  - Security Services - £278k net overspend due to additional security staff across various council sites, £79k corporate cleaning due to the opening of the Harrow Council Hub, £458k building repairs and maintenance due to our ageing property portfolio
  - Staffing – £253k net overspend due to interim staffing arrangements
  - Catering Services - £32k net overspend due to under achievement of income in the Adults catering service.
  - FM Schools SLA - £57k net overspend due to unachieved income
- **Planning & Development** - £724k net overspend due to under achievement of planning application fee income as the number of planning applications were lower than expected £528k, legal fees due to actions being taken in several cases £141k, cost related to historical secondment arrangements £38k and £12k on external consultancy. T
- **Regeneration** – net cost £1.041m mainly on staff costs and additional consultancy advice.
- **Business Rates** - £389k net underspend due to refund for Civic Centre.

2.16 **Housing General Fund** – the outturn is a balance position after drawn down from the Homelessness Prevention Grant (HPG0) of £392k, contribution to the PAP sinking fund £3195k, fully utilizing the 2022-23 Homelessness Prevention Grant (HPG) of £2.246m and a cross divisional adjustment of £269k. This leaves a balance on the HPG of £4.321m.

### **Housing Revenue Account (HRA)**

2.17 The draft 2022-23 outturn for the HRA is a deficit of £1.250m which is an increase of £1.009m compared with the original budgeted loss of £241k. This is due to the following reasons:

- Repairs & maintenance £890k overspend due to continued demand
- Utility costs £605k overspend due to volatility of gas and electric prices in 2022-23
- Various other overspend £102k.

2.18 This is partially mitigated by the following reasons:

- Capital charges £176k underspend due to reduced borrowing requirement
- Additional income £281k due to higher return on balances held
- Depreciation £131k underspend due to minor changes to Beacon Values

## PEOPLE SERVICES

**Table 8: People Services Outturn 2022-23**

Division	Service Area	Revised Budget	Outturn	To/ (From) Reserves	Cross div adjmt	Revised Forecast	Variance to budget
		£'000	£'000	£'000	£'000	£'000	£'000
Adults	Strategic Management	902	589	130	0	719	-183
	Staffing	9,977	10,308		0	10,308	331
	Equipment	967	1,263		0	1,263	296
	Contracts	1,409	1,373	0	0	1,373	-36
	Mental Health	6,565	5,903	0	0	5,903	-662
	Better Care Fund	-12,434	-13,039		0	-13,039	-605
	Purchasing	55,197	56,909	0	0	56,909	1,712
	In House Services	5,830	5,094	0	0	5,094	-736
<b>Adults Total</b>		<b>68,413</b>	<b>68,400</b>	<b>130</b>	<b>0</b>	<b>68,530</b>	<b>117</b>
<b>Public Health Total</b>		<b>-163</b>	<b>-317</b>	<b>154</b>	<b>0</b>	<b>-163</b>	<b>0</b>
Children's Services	Children & Young People	27,646	27,974	-139	400	28,235	589
	Education Services	9,520	7,335	1,553	0	8,888	-632
	People Services Mgt	1,557	1,600	0	0	1,600	43
<b>Children's Services Total</b>		<b>38,723</b>	<b>36,909</b>	<b>1,414</b>	<b>400</b>	<b>38,723</b>	<b>0</b>
<b>People Services Total</b>		<b>106,973</b>	<b>104,992</b>	<b>1,698</b>	<b>400</b>	<b>107,090</b>	<b>117</b>

2.19 As at the end of the financial year, the final outturn for the directorate is a net overspend of £117k after drawdown from reserves and one-off funding

2.20 The reserve movements are shown in Table 9

**Table 9: People Services Reserve Movements 2022-23**

Description	Movement £'000
Adults – Adults Social Care Reserve	130
Children's – Revenue Grant Reserve	517
Children's – Children's Social Care Reserve	-487
Children's – DSG Deficit Reserve	1,384
Public Health – Public Health Reserve	154
<b>People Services net draw down</b>	<b>1,698</b>
Children's – Cross Divisional Adjustment	400
<b>People Services total draw down</b>	<b>2,098</b>

2.21 The variations are explained in more detail at the following paragraphs.

### **Adult Services**

2.22 As at the end of the financial year the final outturn is net overspend of £117k after contribution to reserves.

- 2.23 **Strategic Management** - £183k underspend. This is due to the Adult Social Care reforms grant funding £107k and unallocated contingency which was not spent £76k
- 2.24 **Workforce** - £331k overspend which is due to agreed above establishment staffing costs £835k and PPL transformation costs £25k which have been partially offset by an underspend on the budgeted establishment £23k and additional grant funding £505k
- 2.25 **Equipment** - £296k overspend net of discharge funding £85k. This reflects 45% LA / 55% Integrated Care Board split on equipment issues.
- 2.26 **Contracts** - £36k underspend due to variations on contracts based activity
- 2.27 **Mental Health** - £662k underspend in relation to the provision of mental health services to the under 65s. This comprises a lower than anticipated level of expenditure, increased grant funding £21k and unbudgeted recharges to health £196k offset by interim costs associated with decommissioning projects £54k.
- 2.28 **Better Care Fund** - £605k underspend due to a lower level of staffing costs £277k, uncommitted funding £132k and an increase in the iBCF grant funding £196k (to be used to offset the cessation of the PFI grant of £235k reported within the purchasing budget
- 2.29 **Inhouse Services** - £735k underspend which reflects delays in recruiting to vacant posts and lower costs (including staffing) associated with the provision of transport to day centres £325k.
- 2.30 **Purchasing** - £1.712m overspend made up as follows
- **Older Adults** - £123k net overspend. This is masked by additional one-off grant and health funding of £2.8m. The variation comprises and underspend of £4.5m when compared with packages as at 1 April 2022 (of which £3.3m relates to deaths) offset by new ongoing care packages totalling £4.5m and short term in year costs (largely following hospital discharge) of £2.6m. There was an increase in the bad debt provision of £163k and the cessation of the PFI grant £235k arising from the ownership changes at Sancroft. In addition, costs associated with 12 week disregards and support for carers was less than budgeted offset by increased costs of reablement and respite.
  - **Learning Disabilities** - £732k net overspend. The variation comprises a net increase in costs for existing ongoing care packages at 1 April 2022 (£149k, offset by 8 deaths providing additional capacity of £146k), together with the cost of short term packages of care £110k and new packages of care £551k partially offset by the transforming care partnership grant £76k

- **CYAD** - £823k net overspend. This reflects a net increase in the cost of existing ongoing care packages at 1 April 2022 £466k together with pressure on new packages £309k and a lower level of clawback £48k
- **Shared Lives** - £34k net overspend

## **Public Health**

2.31 At the end of the financial year the final outturn on Public Health was a net underspend of £154k. This is transferred back to the Public Health reserve which takes the reserve balance to £2.828m.

## **Children's Services**

2.32 As at the end of the financial year the final outturn is a balanced budget after a draw down from reserves and use of one-off funding.

2.33 The main variances are summarised in the following paragraphs.

2.34 **Children and Young People Services** – £588k net overspend

- **Children's Placements & Accommodation** - £1.605m net overspend due to an increase in the number of young people requiring accommodation as well as an increase in the complexity of need and cost of provision due to market sufficiency.
- **Frontline Staffing** – £241k net overspend due to staffing pressures to maintain safe caseloads and use of more expensive agency staff due to difficulties in permanent recruitment
- **Commissioned Services** – £97k net overspend signers and interpreters and legal costs in relation to court proceedings.
- **Early Support Services** - £70k net underspend related vacancies and reduced operational costs
- **Client Related Spend** - £106k net underspend on costs to support families with children subject to a Child Protection or Child in Need plan.
- **Other underspends** - £45k net underspend mainly in relation to interagency adoption costs.
- **Draw down from reserves** - £559k net draw down to partially mitigate pressures
- **Use of one-off income** - £575k to partially mitigate pressures

2.35 **Education Services** - £632k net underspend

- **SEN Transport** – £322k net underspend due to net benefit from Harrow and Brent route share recharges
- **Other Education Services** – net underspend £310k mainly due to additional SLA income and vacancies due to difficulty recruiting key posts

2.36 **Commissioning & People Services Management** – £44k net overspend. This relates to a reduction in grant income £41k, staffing pressures in relation to the Mosaic Team £69k and shortfall in income in the Safeguarding Team £10k, partially offset by vacancies in the Commissioning Team £69k

### 2.37 **Dedicated Schools Grant**

2.38 The Dedicated Schools Grant (DSG) is a ring-fenced grant of which the majority is used to fund individual school budgets in maintained schools, academies, and free schools in Harrow. It also funds Early Years nursery free entitlement places 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.

2.39 The final outturn on the High Needs Block is a net underspend of £1.384m. This will be transferred to the DSG Deficit Reserve and reduces the deficit balance from £4.007m brought forward from previous years, to £2.623m at the end of March 2023. The in-year underspend on the HNB is largely attributed to the addition of the High Needs Supplementary Grant in 2022-23 totalling £1.6m as well as reduced spend on independent provision due to expanding Kingsley High School from September 2022 to create 24 additional places for pupils severe learning difficulties.

2.40 Any deficits an authority may have on its DSG account is expected to be carried forward and does not allow or require a local authority to cover this from its general reserves. This arrangement has been extended for three years to March 2026.

2.41 The DfE requires local authorities to explain their plans for bringing the DSG account back into balance. A recovery plan was drafted and discussed with Schools Forum in 2021. This now needs to be updated to take account of current numbers of EHCPs and revised EHCP and financial projections. Despite the significant proposals and measures planned over the next ten years, the Deficit Management Plan shows that this will not fully mitigate the deficit. This is due to the following contributory factors:

- historical underfunding
- proportion of 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

## **CORPORATE AND TECHNICAL**

2.42 As at the end of the financial year the final outturn for the Corporate & Technical budgets is a net underspend of £2.401m after draw down from reserves.

### **Corporate Items**

2.43 As at the end of the financial year the final outturn for the corporate budget is a net underspend of £872k after a drawn down from reserves of £60k. The majority of this relates to additional grant income.

### **Technical Budgets**

2.44 As at the end of the financial year the final outturn, including the contingency for unforeseen items, is net underspend of £1.907m after a draw down from reserves of £12.384m and carry forwards of £413k. The majority of this relates to the contingency for unforeseen items which was not spent as well as underspends on treasury management and capital financing costs.

### **Pay & Non-Pay Inflation Budgets**

2.45 The final outturn on the non-pay inflation budget is an underspend of £2.750m which is partially offset by energy and fuel inflation pressures reported in the directorates.

2.46 The pay inflation budget of £2m overspent by £4.928m which was the cost impact of the 2022-23 pay award

### **Investment Properties**

2.47 As at the end of the financial year the final outturn of additional income £146k which will be added to the Investment Properties reserve for future landlord liabilities.

**Table 10: Summary of Reserves 2022-23**

Description	Brought Forward 01/04/22	Directorate Reserve Movements	Corporate Reserves Movements	Other Reserves movement	Year end Realignments	Balance Carry Forward 31/03/2023
CIL Harrow	-7,108,388	-7,630,504		3,685,491		-11,053,401
Revenue Grant Reserve	-6,641,420	-74,713	576,182		978,000	-5,161,951
Compensatory Added Year Reserve	-242,782		80,000			-162,782
PFI Schools Sinking Fund	-2,071,676	0				-2,071,676
Public Health Reserve	-2,674,142	-154,154	-20,000			-2,848,296
PFI NRC Sinking Fund	-1,823,836					-1,823,836
Legal Services Contingency	-821,239				321,239	-500,000
Carryforward Reserve	-1,330,981	-983,353	917,981			-1,396,353
Collection Fund Reserve	-4,634,745		4,634,745	-2,246,846		-2,246,846
Borough Election	-574,677	414,830				-159,847
Harvist Reserve Harrow Share	-34,034			-54,579		-88,613
Proceeds Of Crime Reserve	-63,000					-63,000
Proceeds Of Crime Reserve Planning	-430,172					-430,172
Public Mortuary Expansion Reserve	-500,000					-500,000
3G Pitch	-25,000	-25,000				-50,000
CIL Mayor	-150,520	-41,739				-192,259
Vehicle Fund	-1,250,478					-1,250,478
PAP Sinking Fund	-393,300	-319,200				-712,500
HRA Hardship Fund	-25,000			22,670		-2,330
HRA Regeneration Reserve	-722,200			522,669		-199,531
HRA Repair Reserve	-277,428					-277,428
HRA Transformation Reserve	-542,965			542,965		0
Business Risk Reserve	-1,968,198	903,979			909,219	-155,000
Capacity Build/ Transformation Reserve	-3,172,652	1,345,474		0	1,299,251	-527,927
Equalities Diversity & Inclusion Reserve	-157,273	76,000			55,273	-26,000
<b>Total Earmarked (Specific) Reserves</b>	<b>-37,636,106</b>	<b>-6,488,380</b>	<b>6,188,908</b>	<b>2,472,370</b>	<b>3,562,982</b>	<b>-31,900,226</b>
Decommissioning Accommodation					-561,000	-561,000
Adults Social Care Reserve	-3,769,475	-130,000			2,099,000	-1,800,475
People Services MTFS Implementation					-2,099,000	-2,099,000
Children's Social Care Reserve	-3,108,120	487,349				-2,620,771
Insurance Reserve	-959,318	0		-824,124	479,318	-1,304,124
Place MTFS Implementation Reserve	0	-1,595,000				-1,595,000
Investment Property Reserve	-977,385		-145,575			-1,122,960
Corporate MTFS Implementation Reserve		0			-3,000,000	-3,000,000
Capital Feasibilities Reserve	-500,000	15,000			485,000	0
Accommodation Strategy Reserve	-652,000	91,000			561,000	0
1 Hour Free Parking	0	404,745		-404,745		0
Headstone Manor Reserve	-287,750				287,750	0
Libraries Reserve	-150,000				150,000	0
IT Reserve	-134,000				134,000	0
<b>Total Earmarked (Non Specific) Reserve</b>	<b>-10,538,048</b>	<b>-726,906</b>	<b>-145,575</b>	<b>-1,228,869</b>	<b>-1,463,932</b>	<b>-14,103,330</b>
Budget Planning Reserve MTFS gap	-22,490,358		5,842,058	404,745	-2,099,050	-18,342,606
<b>Total Non Earmarked Reserves</b>	<b>-22,490,358</b>	<b>0</b>	<b>5,842,058</b>	<b>404,745</b>	<b>-2,099,050</b>	<b>-18,342,606</b>
General Fund Reserves	-10,008,000					-10,008,000
<b>Total General Fund Reserves</b>	<b>-10,008,000</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>-10,008,000</b>
DSG Deficit Recovery		-1,384,105				-1,384,105
DSG Overspend	4,006,867					4,006,867
<b>Total Ringfenced DSG Net Deficit</b>	<b>4,006,867</b>	<b>-1,384,105</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2,622,762</b>
<b>Grand Total All Reserves</b>	<b>-76,665,646</b>	<b>-8,599,391</b>	<b>11,885,391</b>	<b>1,648,247</b>	<b>0</b>	<b>-71,731,400</b>

### New Earmarked Reserves

2.48 In addition to the existing reserves in the above table, there have been four new reserves established in 2022-23.

- **Decommissioning Accommodation** – this has been repurposed from the Accommodation Strategy reserve and has been established to fund costs associated with the closure of the Civic Centre

- **People Services Implementation MTFS Reserve** – this has been repurposed from the uncommitted Adults Social Care Reserve and has been established to fund the implementation costs in People Services to support the delivery of the MTFS
- **Place MTFS Implementation Reserve** – this has been established to fund the implementation costs in Place directorate to support the delivery of the MTFS
- **Corporate MTFS Implementation Reserve** – this has been established to fund the corporate implementation costs, particularly in relation to redundancy costs, to support the directorates' delivery of the MTFS

## **GRANTS**

2.49 Attached at Appendix 1 is a schedule of all the revenue grants the Council received in 2022-23. The majority of these grants are received and paid out and do not impact on the bottom line for example Dedicated Schools Grant £143m which is paid out to education providers and Housing Benefit Subsidy £117m which is paid to Housing Benefit Claimants.

## **CARRY FORWARDS**

2.50 Attached at Appendix 2 is a schedule of the revenue budget carry forwards included in the final outturn for 2022-23 that will be carried forward to 2023-24. The carry forwards have been agreed by the Director of Finance in accordance with the Financial Regulations.

## **3.0 CAPITAL PROGRAMME**

3.1 The revised capital budget for 2022-23 is £156.161m as set out at Table 11 and in more detail at Appendix 3:



**Table 11: Capital Programme Budget 2022-23 Final Outturn**

Directorate	Grant Funding/CiL/ S106 (A)	Harrow Borrowing (B)	TOTAL BUDGET (A+B)	Outturn	Variance	Outturn variance split by funding			Over/ Underspend after Slippage	Over/ Underspend after Slippage funding	
						Grant Funding/CiL/ S106	Harrow Borrowing	Slippage		Grant Funding /CiL/ S106	Harrow Borrowing
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
<b>RESOURCES TOTAL</b>	<b>0</b>	<b>12,129</b>	<b>12,129</b>	<b>3,641</b>	<b>(8,488)</b>	<b>(0)</b>	<b>(8,488)</b>	<b>(8,488)</b>	<b>(0)</b>	<b>0</b>	<b>(0)</b>
<b>PLACE:</b>											
Environment	10,437	17,301	27,738	7,710	(20,028)	(7,882)	(12,146)	(18,624)	(1,404)	(1,391)	(13)
Inclusive Economy, Leisure & Culture	5,050	1,458	6,508	3,063	(3,446)	(2,238)	(1,207)	(2,546)	(900)	(387)	(513)
Regeneration & Development	1,097	16,490	17,588	2,254	(15,334)	(719)	(14,614)	(15,040)	(294)	(0)	(294)
Housing General Fund	2,809	7,620	10,429	5,455	(4,974)	(1,655)	(3,319)	(4,098)	(876)	0	(876)
<b>PLACE TOTAL</b>	<b>19,394</b>	<b>42,869</b>	<b>62,263</b>	<b>18,482</b>	<b>(43,781)</b>	<b>(12,494)</b>	<b>(31,287)</b>	<b>(40,307)</b>	<b>(3,475)</b>	<b>(1,778)</b>	<b>(1,696)</b>
<b>PEOPLE:</b>											
Adults	0	358	358	(2)	(359)	0	(359)	(358)	(2)	0	(2)
Public Health	7	0	7	6	(1)	(1)	0	(1)	0	0	0
Children	28,414	137	28,551	3,261	(25,290)	(25,154)	(136)	(25,283)	(7)	0	(7)
<b>PEOPLE TOTAL</b>	<b>28,420</b>	<b>495</b>	<b>28,915</b>	<b>3,265</b>	<b>(25,650)</b>	<b>(25,155)</b>	<b>(495)</b>	<b>(25,641)</b>	<b>(9)</b>	<b>0</b>	<b>(9)</b>
<b>TOTAL GENERAL FUND</b>	<b>47,814</b>	<b>55,493</b>	<b>103,307</b>	<b>25,388</b>	<b>(77,919)</b>	<b>(37,649)</b>	<b>(40,270)</b>	<b>(74,436)</b>	<b>(3,484)</b>	<b>(1,778)</b>	<b>(1,705)</b>
<b>TOTAL HRA</b>	<b>35,726</b>	<b>17,128</b>	<b>52,854</b>	<b>14,989</b>	<b>(37,866)</b>	<b>(27,729)</b>	<b>(10,136)</b>	<b>(24,357)</b>	<b>(13,508)</b>	<b>(15,896)</b>	<b>2,388</b>
<b>TOTAL GENERAL FUND &amp; HRA</b>	<b>83,540</b>	<b>72,621</b>	<b>156,161</b>	<b>40,376</b>	<b>(115,785)</b>	<b>(65,379)</b>	<b>(50,406)</b>	<b>(98,793)</b>	<b>(16,993)</b>	<b>(17,674)</b>	<b>682</b>

3.2 The final general fund capital programme budget in 2022-23 is £103.307m. The net outturn position on the capital budget at the end of the financial year is £25.388m which represents 25% of the total capital programme budget. The variance of £77.919m is made up of slippage of £74.436m and an underspend of £3.484m. Of the £3.484m underspend, £1.778m relates to schemes funded by external funding and the remaining £1.7m relates to schemes funded from borrowing. The underspend on schemes funded by borrowing will produce capital financing savings which will contribute towards the capital financing savings incorporated in the current MTFS. Since the capital programme has such a significant underspend there will be a review of slippages in light of the outturn position

3.3 The Housing Revenue Account (HRA) capital programme budget is £52.854m. The final outturn position on the HRA capital budget at the end of the financial year is £14.989m which represents 28% of the total HRA capital programme budget. The variance of £37.866m is made up of slippage of £24.357m and a net underspend of £13.508m.

## **RESOURCES**

3.4 As at the end of the financial year the final spend is £3.641m against a budget of £12.129m representing 30% of the total budget. The variance of £8.488m will be slipped to 2023-24.

- **Digital Improvement Programme** - £1.033m slippage relates to the replacement of Careline devices delay in delivery due to a worldwide shortage of parts and scaled down production of the devices.
- **ICT Refresh** - £2.559m slippage in relation to the ongoing ICT Refresh, Devolved Applications, and other digitalisation programme which reflects changing priorities and revised timescales of current schemes which will complete in the next financial year.
- **Other Council Wide schemes** - £2.249m slippage. This relates to estimated spend of £1.7m for critical works to Sancroft Care Home approved in April 2023 to be carried out in 2023-24. The remaining slippage will be allocated to future council wide schemes subject to business cases.

3.5 There are no revenue implications as a result of this slippage.

### **PLACE**

3.6 As at the end of the financial year the final spend is £18.483m which represents 30% of the capital budget. Of the variance to budget of £43.781m, a total of £40.307m of funding will be slipped to 2023-24 to complete ongoing projects. The underspend of £3.475m results from project underspends of £1.510m, NCIL funded projects withdrawn £195k and externally funded projects of £1.769m reclassified as revenue.

### **Environment**

3.7 The final spend is £7.710m against a budget of £27.738m. £18.624m of funding will be slipped to 2023-24 related to projects listed below. The underspend of £1.391m represents TfL funded projects assumed in the capital programme, but LIP funding was confirmed late in 2022-23 and the scope of works meant that the spend was reclassified as revenue expenditure. The other underspends of £13k relate to historical projects where there is no outstanding work.

- **CA Site infrastructure** - £153k slippage. The funding is set aside for a number of improvement works at the CA site to be delivered in 2023-24
- **Depot Redevelopment** - £2.322m slippage. The redevelopment project is largely complete, with outstanding works in external areas to be completed in 2023-24. Options will be reviewed once the design for entrances to the site is completed. There are also some snagging works following the construction of the main building which will need to be resolved in 2023-24.
- **Flood Defence and Highways Drainage** - £144k slippage. Some of the works were on hold due to the delay in the approval of partnership funding

from the Environment Agency. The remaining budget will be committed in 2023-24 as the project is not ready for construction delivery phase.

- **Highway Programme** - £6.452m slippage and **Street Lighting** - £1.464m slippage. Capital funding was released late in 2022-23 due to the review of the Highway Investment Strategy. The Strategy has now been approved by Cabinet and work orders are placed to deliver the prioritised schemes.
- **Parking Management Programme** - £127k slippage. Some of the schemes were delayed but works are continuing into 2023-24 and the proposed measures will be implemented subject to the outcome of relevant consultations.
- **Wealdstone Future High Street Fund** – £5.736m slippage. This is a multiple year projects, funded by DLUHC and BCIL funding, originally for the construction of a footbridge and implementing Intelligent High Street. A Project Adjustment Form has been submitted to DLUHC to seek approval to deliver alternative projects. The budget will be slipped to 2023-24 whilst awaiting approval.
- **Parks Infrastructure** - £614k slippage and **Parks Playground Improvement** - £46k slippage. A few projects such as Cedar Gate posts and Bernays Garden wall are ongoing following successful external funding applications. A programme of park improvement works was drawn up in late 2022 and is scheduled for delivery in 2023-24.
- **Vehicles Procurement** - £136k slippage. The budget was originally profiled in 2022-23 to deliver the replacement of a few small vehicles. Following an assessment of vehicle condition, it is planned to keep these for longer and therefore the budget is slipped to 2023-24.
- **CCTV Cameras and CCTV Infrastructure** - £382k slippage. The installation of a new CCTV control room commenced in 2022-23 with some remaining works continuing into 2023-24. The remaining budget will be used to fund these and additional CCTV cameras.
- **Public Sector Decarbonisation Scheme** - £525k slippage, **Carbon Offset Fund** - £40k slippage and **Climate Emergency (Energy Emission Reduction Measures)** - £250k slippage. External funding was secured to deliver energy efficiency measures across school sites and corporate buildings. These projects are near completion. More energy efficiency projects will be delivered in 2023-24 utilising the slippage.
- **Wealdstone Bus Improvement Scheme** - £234k slippage. Works are ongoing and the project is due to be completed in early 2023-24.

3.8 Unless stated otherwise, the slippage has no implications on the revenue budget.

## **Inclusive Economy, Leisure and Culture**

3.9 The final outturn is spend of £3.063m against a budget of £6.508m which represents 47% of the budget. Of the variance to budget of £3.445m, a total of £2.545m of funding will be slipped to 2023-24 to complete ongoing projects. The underspend of £900k results from project underspends of £22k for projects fully completed, £500k budget surplus for Harrow High Street Fund Programme and £378k being removed from the capital programme as the corresponding BCIL funded projects are of revenue nature and therefore reclassified as revenue projects.

- **High Street Fund** - £1.165m slippage. This project is BCIL funded. A new programme of activities has been agreed and it is being progressed to delivery phase in 2023-24.
- **Harrow Arts Centre** - £637k slippage. The construction works are underway on site. There have been some delays due to material and subcontractor issues. The project is now due for completion in Q1 2023-24
- **Harrow Arts Centre Capital Infrastructure** - £43k underspend. The funding is set aside for roof repair, however the cost is more expensive than expected due to the presence of asbestos. The project will be progressed by allocating some of the 2023-24 budget in the capital programme to complete the work.
- **Harrow Weald Pavilion** - £10k slippage due to outstanding electrical works which will be completed in 2023-24
- **Libraries and Leisure Capital Infrastructure** - £114k slippage. There is a delay in completing the renovation of wet side changing facilities at the leisure centre due to the need to coordinate the works with other essential health & safety works relating to the control of legionella.
- **Tennis Infrastructure** - £551k slippage. The refurbishment of tennis courts is underway following the award of external funding from Lawn Tennis Association
- **UK Shared Prosperity Fund** - £25k slippage. The GLA grant agreement was signed in March 2023, therefore the funding originally profiled in 2022-23 for parks & open spaces will be slipped to 2023-24 to deliver activities.

3.10 Unless stated otherwise, the slippage has no implications on the revenue budget.

## **Regeneration & Development**

3.11 The final outturn is spend of £2.255m against a budget of £17.588m which represents 13% of the capital budget. The variance of £15.333m relates to

£15.039m slippage which is listed below. The underspend of £294k largely relates to NCIL funded projects.

- Accommodation Strategy - £529k slippage. Works are ongoing to provide ancillary space following the Civic Centre closure
- **Investment in 3 core sites** - £10.198m slippage and **Harrow New Civic** - £2.070m slippage. Out of the 3 core sites funding, £9.905m has been set aside for Grange Farm redevelopment Phase 2 (units for private sale) as detailed in the HSDP Review & Progress report presented to Cabinet in November 2022. The remaining funding (including £1.915m in 2023-24) will be used to fund the design & planning stage of Phase 3.
- **Neighbourhood CIL** - £466k slippage. The delivery of approved projects in various wards in 2022-23 will continue into 2023-24. Following a review on NCIL during 2022-23, some projects were completed with a surplus budget and some projects were withdrawn. The budget underspend of £254k has been returned to NCIL post before establishing the starting balance of each ward under new ward boundaries. This is reflected as an underspend in the capital programme.
- **High Priority Planned Maintenance** - £1.312m slippage. The project at Sancroft £171k was delayed as it is being revisited. The remaining budget in the programme is slipped to 2023-24 to fund planned building improvement works that will be prioritised, pending the completion of Strategic Asset Management Plan (SAMP).
- **Bannister Café** - £257k slippage. Although works were resumed following the delay caused by the pandemic, these were paused due to additional costs claimed by the contractor. Options are being explored to progress this project.
- **Waxwell Lane** - £207k slippage. This slippage will be used to complete the existing commitments in 2023-24 before the sales progress in the Summer.

3.12 Unless stated otherwise, the slippage has no implications on the revenue budget.

### **Housing General Fund**

3.17 The final outturn is spend of £5.457m against a budget of £10.429m which represents 52% of the budget. The variance of £4.972m is made up of £4.096m slippage which is listed below and £876k underspend.

- **Empty Properties Grant** - £70k underspend. The buy to let market has become less viable for many landlords due to taxation and high interest rates. This has led to shortage in private sector rental properties. Market rent levels have increased significantly compared to LHA rates making

Harrow less competitive. This has resulted in reduced uptake for the EPG scheme.

- **Property Acquisition Programme 2022-23** - £2.441m slippage and £734k underspend. The slippage relates to the acquisition of the remaining 7 properties within the programme which will conclude in 2023-24. The underspend will be released back into the capital programme.
- **Property Acquisition Programme 2021-22** - £72k underspend as project has been completed.
- **Disabled Facilities Grant (DFG)** - £1.655m slippage. This relates to external grant to be slipped to 2023-24 to cover contractual commitments of £154k that are being undertaken and will be completed in 2023-24 and the remainder of the grant will be added to next year's programme. The service is currently undergoing peer review to establish best practice and efficiencies and effective ways of allocating the DFG budget allocation.

3.18 Unless stated otherwise, the slippage has no implications on the revenue budget.

### **Housing Revenue Account (HRA)**

3.19 The final outturn is spend of £14.989m against a budget of £52.854m which represents 28% of the capital budget. The variance of £37.867m is made up of £24.358m slippage which is listed below and underspend of £13.509m for schemes which have either been completed or where budget is no longer required and is being removed from the capital programme.

3.20 The slippage of £7.099m relates the following schemes

3.21 **Planned Investment Programme** - £6.202m slippage of which significant slippage of more than £100k relates as follows:

- **Homes Safe Three** - £1.825m slippage due to delays in procurement and supply of materials that will mean that the remainder of this programme will be delivered in 2023-24.
- **Installation of Heat Pump Technology** - £1.190m slippage due to the original project on three sites being delayed as due to issues with legionella on one site which has meant that the project will now be delivered in 2023-24 on two sites.
- **Retrofit for energy** - £1.391m slippage. This relates to external funding secured from the Social Housing Decarbonisation Fund in 2022-23 for 2023-24 and 2024-25. There is a requirement that Harrow provides match funds. AT the time that the 2023-24 budget was set, the details of the bid were still being finalised and provisional match funding of £1m was set aside for each of the 3 years of the MTFs. Following a review of the

budgets, it was proposed to utilise £1m from the uncommitted budget within planned investment and carry this forward into 2023-24 to top up the Retrofit for energy budget in 2023-24 to ensure the Harrow match funding is in place to maximise the external grant received.

- **Two Storey Fire Doors** - £391k slippage. Delays in procurement means that most of this programme will be delivered in 2023-24.
  - **Dickson Fold Land Purchase** - £342k slippage as an agreement is still to be reached on a price for acquisition of land for housing properties.
  - **Emergency Lighting** - £161k slippage due to delays with contract award
  - **Aids and Adaptations** - £104k slippage due to delays in works
  - **Other** - £445k slippage for works that have just completed or completing enabling works prior to commencement of projects in 2023-24
  - **Smoke Alarms** - £193k slippage due to programme delays
  - **Windows & Doors 2022-23** - £176k slippage due to asbestos tests
  - **Roofs on Street Properties 2022-23** - £375k slippage due to procurement delays
- 3.22 **Housing IT Schemes** - £328k slippage due to reprofiling of expenditure in 2022-23 and 2023-24 to reflect rephasing of the project go-live date.
- 3.23 **Grange Farm Phase 1** - £2.451m slippage due to completion works being slipped to June 2023
- 3.24 **Grange Farm Phase 2** - £1.0m slippage and £809k underspend. This was set aside for acquisition of property within Phase 2 and is now no longer required. It is proposed to use £1.0m of this budget in the next financial year. Of this, £500k will be used to top up the budget set aside for the acquisition of the 20 Notting Hill Genesis properties and £500k set aside for client side costs not budgeted for.
- 3.25 **Phase 2 Delivery** - £411k slippage. In November 2022, Cabinet agreed to reprofile Phase 2 of Grange Farm to be delivered via Harrow Strategic Development Partnership. Due to the late start, the budget is required in 2023-24.
- 3.26 **Grange Farm Phase 3** - £225k slippage and £57k underspend. This was set aside for Phase 3 commencing in 2022-23. Following a review, this phase will only be taken to planning and the budgets have been reprofiled accordingly.

3.27 **Grange Farm Infrastructure** - £4.878m slippage. This budget relates to the client side costs of phases 2 and 3 of the Grange Farm regeneration programme in 2023-24

3.28 **Building Council Homes for Londoners Programme** - £7.472m slippage and £9.329m underspend. Schemes have been reviewed and it is not possible to achieve start on site on some projects by 31 March 2023.

3.29 Unless stated otherwise, there are no revenue implications as a result of this slippage.

### **PEOPLE SERVICES**

3.30 As at the end of the financial year the final spend is £3.265m which is 11% of the total budget.

#### **Adult Services**

3.31 In 2022-23 there was no spend against these projects and the full £358k will be slipped to 2023-24 as follows

3.32 **Assistive Technology Programme** - £270k slippage. The service is scoping more products and looking for a cohort of people who might benefit from this technology. Potential reablement projects are being investigated in terms of cost and practicality.

3.33 **Inhouse Services** - £88k slippage. The budget is to support projects under consideration at Wiseworks to aid the front facing Adults Social Care vision and for integration of Learning Disability services to be carried out in 2023-24

#### **Public Health**

3.34 As at the end of the financial year the final spend is £6k of the total £7k budget. The remaining £1k will be slipped to 2023-24.

#### **Children's Services**

3.35 As at the end of the financial year the final outturn is spend of £3.245m against a budget of £28.519m. The remaining £25.275m will be slipped to future years.

3.36 Additional Basic Need Grant Funding of £14.973m was allocated to the LA in 2021-22 to enable the LA to meet its statutory duty of providing sufficient mainstream school places. However, the current projections indicate that there is not a requirement for any permanent expansion at this stage. Funding allocated for bulge classes and historical capital maintenance funding, also funded from grant, will also be slipped to future years as this is not currently required.



3.37 In addition, the majority of the SEN Expansion Programme funding will be slipped to 2023-24 as the additional provision will now be opened in September 2023.

3.38 There are no revenue implications as a result of this slippage.

## **ADDITIONS AND AMENDMENTS TO THE CAPITAL PROGRAMME**

### **3.39 Schools Condition Allocation £695,355 - addition**

3.40 The SCA capital grant is provided by the DfE to help LAs maintain and improve the condition of maintained school buildings and grounds. The grant allocation for 2022-23 was announced in March 2023 after the capital programme was approved in February, which included a £2m provisional allocation. The final grant allocation is £2,695,355. It is therefore proposed that an additional budget of £695,355 is included in the 2023-24 capital programme.

### **3.41 Green and Resilient Spaces Fund £300,000 - addition**

3.42 Following a successful application to the Green and Resilient Spaces Fund for the Silk Stream Catchment (Chandos and Watling) Parks project, the GLA has awarded a total of £600,000 funding which is to be split 50/50 between two parks (Watling Park in Barnet and Chandos Park in Harrow). This forms the partnership funding for the wider parks infrastructure that will support the DEFRA funded Silk Stream river catchment flood defence, resilience and storage that will be constructed in the river of these two parks. Harrow's share of the funding is £300,000. It is therefore proposed that an additional budget of £300,000 is included in the 2023-24 capital programme.

### **3.43 Future High Street Fund/Borough CIL £625,000 - virement**

3.44 Following the approval of Project Adjustment Form by DHULC for the Future High Street Fund (FHSF) project, the revised projects under FHSF focus on improvements in Harrow Town Centre instead of Wealdstone set out in the original funding application. As such, it is proposed that the project name in the capital programme is amended from "Wealdstone Future High Street Fund" to "Future High Street Fund – Harrow Town Centre". The estimated cost of the revised projects are £8.282m, to be met from the remaining FHSF of £7.147m and Borough CIL match funding of £1.135m. In the approved capital programme, Borough CIL match funding of £1.760m is included based on the original project requirements. Therefore, it is proposed that the Borough CIL budget is reduced by £625,000 in the FHSF project and reallocated to Borough CIL funded projects within the capital programme for other purposes (subject to business cases).

## **4.0 COUNCIL TRADING STRUCTURE UPDATE 2022-23**

4.1 The Council's Trading Structure update is attached at Appendix 4 and summarises the financial position and provides a general update on the activities of all the Council's trading entities.

## 5.0 **REPORTING FOR THE 2022-23 FINANCIAL YEAR**

5.1 This is the final revenue and capital budget monitoring report for 2022-23

### 6.0 **Implications of the Recommendation**

Implications of recommendation are set out in the body of this report.

### 7.0 **Performance Issues**

Good financial monitoring is essential to ensuring that there are adequate and appropriately directed resources to support delivery and achievement of Council priorities and targets as set out in the Corporate Plan. In addition, adherence to the Prudential Framework ensures capital expenditure plans remain affordable in the longer term and that capital resources are maximized.

As at the end of the financial year the final revenue outturn is a balanced position.

The final outturn on the capital programme is spend of £40.376m against a total budget of £156.161m which represents 26% of the budget. The variance of £115.785m is made up of slippage of £98.793m and underspend of £16.993m.

### 8.0 **Environmental Implications**

There is no direct environmental impact.

### 9.0 **Risk Management Implications**

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

Separate risk register in place? **No**

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

The following key risks should be taken onto account when noting the report:

<b>Risk Description</b>	<b>Mitigations</b>	<b>RAG Status</b>
Failure to deliver the revenue budget on target	<ul style="list-style-type: none"> <li>▪ The final outturn is a balanced position after net draw down from reserves</li> </ul>	Green
The forecast overspend will continue into the following year leading to an adverse impact on	<ul style="list-style-type: none"> <li>▪ The expenditure pressure areas from 2022/23 are reflected in the budget setting process for 2023/24.</li> </ul>	Green

financial performance in 2023/24		
Projects within the Capital Programme exceed their budget, potentially resulting in additional capital financing costs	<ul style="list-style-type: none"> <li>▪ If projects exceed their costs, Directorates would be asked to find compensatory savings elsewhere in the programme to cover the overspend. In the worst-case scenario, a council wide capital budget is held and a virement would be carried out to offset the overspend.</li> </ul>	Green
Additions to the capital programme occur that may incur additional borrowing costs to the council	<ul style="list-style-type: none"> <li>▪ Funded by additional grants and contributions thus no additional capital financing costs will be incurred</li> </ul>	Green

## 10.0 Procurement Implications

Any procurement arising from this report will be supported by the Procurement Team and will be undertaken compliant with the Public Contract Regulations 2015 and the Council's Contract Procedure Rules.

## 11.0 Legal Implications

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 28 of the Local government Act 2003 imposes a statutory duty on a billing or major precepting authority to monitor, during the financial year, its income and expenditure against budget calculations.

Under the Financial Regulations B48 Additions in year to the Capital Programme

Up to £5m – additional capital spending can be approved by Cabinet on specific projects where

- I. The expenditure is wholly covered by additional external sources; and
- II. The expenditure is in accordance with at least one of the priorities listed in the capital programme; and
- III. There are no full year revenue budget effects

The additional capital spending agreed by Cabinet in one financial year cannot exceed £20 million.

## 12.0 Financial Implications

Financial matters are integral to this report.

### 13.0 Equalities implications / Public Sector Equality Duty

13.1 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 budget 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:

13.2 A public authority must, in the exercise of its functions, have due regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

13.2 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, in particular, to the need to:

- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- 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;
- 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, in particular, 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:
- Tackle prejudice, and
- Promote understanding.

13.3 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

13.4 Equality assessments were undertaken for the budget proposals agreed by Council listed as part of the MTFS process and an overall equality assessment was undertaken on the MTFS.

13.5 There is only recommendation in this report for decision “That Cabinet approve the proposed amendments to the Capital Programme as set out in paragraphs 3.33 to 3.34 and Appendix 5. It is not considered that this will have a detrimental equalities impact.

#### **14.0 Council Priorities**

- A council that puts residents first
- A borough that is clean and safe
- A place where those in need are supported

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

### **Statutory Officer: Dawn Calvert**

Signed by the Chief Financial Officer

**Date: 04/07/23**

### **Statutory Officer: Jessica Farmer**

Signed by the Monitoring Officer

**Date: 30/06/23**

### **Chief Officer: Alex Dewsnap**

Signed by the Managing Director

**Date: 11/07/23**

### **Head of Procurement: Nimesh Mehta**

Signed by the Head of Procurement

**Date: 28/06/23**

**Head of Internal Audit: Neale Burns**

Signed on behalf by Head of Internal Audit

**Date: 28/06/23**

## **Mandatory Checks**

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

*EqlA carried out: NO*

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

**Contact:** Sharon Daniels, Head of Strategic and Technical Finance  
(Deputy S151), Telephone 020 8424 1332, Sharon  
[Daniels@harrow.gov.uk](mailto:Daniels@harrow.gov.uk)

### **Background Papers:**

[Final Revenue Budget 2022/23 and Medium-Term Financial Strategy  
2022/23 to 2024/25 Report](#)

**Call-in waived by the Chair of Overview and Scrutiny  
Committee - NO**

Directorate	Awarding Body	Grant Name	Ringfenced Y/N	Value	Purpose of grant
Corporate	DLUHC	S31 Business Rates Relief	Y	£4,760,000	Compensation from government to billing authorities for the cost of Business Rate reliefs
Corporate	DLUHC	NNDR Multiplier inflation	Y	£3,259,000	Compensation from government for the NNDR multiplier not being increased in line with RPI.
Corporate	DLUHC	Lower Tier Grant	Y	£421,000	Funding to councils with responsibility for services such as homelessness, planning, recycling, refuse collection and leisure services
Corporate	DLUHC	New Services Grant	Y	£2,735,129	One off grant to support local government costs including for the increase in employer NI contributions
Corporate	DLUHC	Revenue Support Grant	Y	£1,648,000	government grant given to LAs to support revenue expenditure
Corporate	DLUHC	Business Rates Top Up Grant	Y	£22,623,424	government grant given to LAs to support revenue expenditure
Corporate	DLUHC	Business Rates Retention	Y	£12,881,000	government grant given to LAs to support revenue expenditure
People	DHSC	Market Sustainability and Fair Cost of Care Fund	Y	£654,634	Support local authorities to move towards paying providers a fair cost of care and to prepare their markets for adult social care reform
People	DLUHC	Independent Living Fund	Y	£295,206.00	to provide financial support to disabled people with high support needs
People	DHSC	Local Reform and community voices	Y	£145,811	• Funding for Deprivation of Liberty Safeguards (DOLS) in Hospitals; • Local Healthwatch funding, and; • Funding for Independent NHS Complaints Advocacy Services (ICAS).
People	DLUHC	PFI	Y	£965,648	To help fund costs of historic PFI projects for NRC's
People	DHSC	Implementation Support Grant	Y	£107,980	support to local authorities towards expenditure associated with the adult social care charging reform implementation (October 2023).
People	DLUHC	Improved Better Care Fund	Y	£6,663,537	Meeting adult social care needs, supporting people to be discharged from hospital when they are ready, ensuring the social care provider market is supported
People	DLUHC	Social Care Grant	Y	£7,720,558	The purpose of the grant is to provide support to local authorities in England towards expenditure lawfully incurred or to be incurred by them
People	DOH	Community discharge Grant	y	£78,795	The purpose of the Grant is to provide Transforming Care Partnership (TCPs) and Integrated Care Systems (ICSs) with additional funding to facilitate timely discharges into the community
People	DHSC	Adult Social Care Discharge Fund	Y	£1,924,153	prioritise those approaches that are most effective in freeing up the maximum number of hospital beds and reducing bed days lost within the funding available, enable more people to be discharged to an appropriate setting, boost workforce capacity to help reduce delayed discharges
People	Home Office	Unaccompanied Asylum Seeking Children	Y	£1,491,632	To support UASC and 18+ Asylum seekers. Grant as is claimed in arrears based on agreed support days. £1,491,632 grant banked from Home Office during 2021/22.
People	YJB	Youth Justice Grant	Y	£257,636	Delivery of youth justice services
People	DFE	Holiday Activities & Food Programme	Y	£663,060	Co-ordination of free activities and healthy food for disadvantaged children.

Directorate	Awarding Body	Grant Name	Ringfenced Y/N	Value	Purpose of grant
People	ESFA	Children Looked After Pupil Premium Grant	Y	£339,810	Grant per child for looked after children by LA for at least 1 day. LAC premium is managed by Virtual School Head for the benefit of the child. Grants to be paid to schools and also can be held centrally to be pay for staffing, tutors training etc. Grant needs to be fully spent. Unspent grant is recovered by ESFA.
People	DLUHC	Supporting Families (was Troubled Families)	Y	£691,934	Provision of intensive family support services and increasing the maturity of the Early Help system. Also bringing services together around families to deliver whole family working. £534k Advance payment and up to £158k Payments by Results
People	DWP	Reducing Parental Conflict	Y	£31,218	To develop staff skills and capability to identify parents experiencing parental conflict, deliver specialist interventions and provide other support to reduce parental conflict
People	DfE	Social Workers in Schools	Y	£337,589 TBC	A team of social workers based in schools (SWIS) with the aim they work more effectively with education colleagues and with children and families. Grant can be claimed for salary costs only.
People	DfE	School Improvement Monitoring & Brokerage	Y	£62,136	Purpose of this grant is to support LA fulfilling statutory school improvement functions for maintained schools
People	DfE	Extended Rights for Home to School Travel	Y	£7,600	To promote sustainable travel for children and young people of compulsory school age who travel to receive education or training
People	DfE	Schools PFI	Y	£1,543,316	PFI grant to contribute to annual schools PFI contract.
People	DfE	Sec 31 Extension of the Role of Virtual School Heads	Y	£30,000	The purpose of this grant is to provide support to local authorities in England, to help them meet their duty to appoint a Virtual School Head for previously looked-after children and make information and advice available to the following parties for the purposes of promoting the education of eligible previously looked-after children
People	DfE	Sec 31 Extension of the Role of Virtual School Heads to children with a social worker Implementation Grant	Y	£100,000	Extend the role of the Virtual School Head to promote the educational outcomes of the cohort of children with a social worker in early years setting, schools and colleges. To help all childrens with Socail worker to make educational progress.
People	HMPPS	Remand	Y	£74,417	Under 18s in remand/secure accommodation placements
People	DfE	Staying Put	Y	£71,259	Statutory Staying Put duty (18+ remain with foster carers)
People	DfE	Personal Advisor	Y	£55,550	Statutory duty Personal Adviser support to all care leavers up to age 25
People	DfE	Adoption Support Fund	Y	Variable TBC	Therapeutic services for adoptive and Special Guardianship Order (SGO) families. Extended to Residence Order and Child Arrangement Order families for 2022/23. Approved claims.
People	ESFA	KS2 Moderation and KS1 Phonics	N	£7,051	To support the teaching of phonics at key stage 2
People	MOPAC	Your Choice	Y	Up to £58,000	To deliver High Intensity Therapeutic Interventions for children and young people who get involved in violence.
People	MOJ	Turnaround Programme	Y	£31,235	To intervene earlier and improve outcomes for children on the cusp of entering the Youth Justice System. This additional funding will enable YOTs to consistently support a cohort of children not currently on their statutory caseload.
People	DfT	Bus Service Operators (BSOG)	Y	£69,341	Split 66.66% childrens and 33.33% adults. Payment made to LA for community transport.
People	MOPAC	Appropriate Adult	Y	Up to £17,111	46% refund for Appropriate Adult costs incurred for young people and adults in Harrow and Barnet custody suites. Value is estimated based on max amount available



Directorate	Awarding Body	Grant Name	Ringfenced Y/N	Value	Purpose of grant
People	DOH	Public Health Grant	Y	£11,627,344	Improving the health of the local population and reducing health inequalities
People	DOH	Supplemental Substance Misuse treatment & Recovery Grant	Y	£229,290	Additional Funding to support improvement in the quality and capacity of D&A treatment
People	DOH	Inpatient Detoxification Grant	Y	£18,428	Inpatient detox and rehab
People	ESFA	Dedicated Schools Grant	Y	£143,293,401	75% passported to schools and early years providers determined by funding formulae. 25% retained by LA for commissioning of High Needs provision for pupils with Special Educational Needs & Disabilities
People	ESFA	Pupil Premium Grant	Y	£3,682,245	All passported to schools
People	ESFA	Universal Infant Free School Meals	Y	£1,329,952	All passported to schools
People	ESFA	16-19 Sixth Form provision	Y	£1,860,369	All passported to schools
People	ESFA	PE & Sports	Y	£1,858,719	All passported to schools (2021-22 allocation, 2022-23 tbc)
People	ESFA	School Led Tutoring programme	Y	£249,729	All passported to schools. To support catch-up for lost education due to COVID-19. Grant is for 2021/22 Academic Year
People	ESFA	Recovery Premium	Y	£111,714	All passported to schools. Additional funding for eligible schools based on Pupil Premium eligibility to provide further support to disadvantaged pupils. Grant is for 2021/22 Academic Year
Place	Mayor of London - Rewild London Fund	Making the Difference - Bentley Priory: Bigger; Better; Wetter and all Joined Up	Y	£48,601	To help restore wildlife habitats including rivers, help species such as water vole thrive, create meadows for pollinators and new wetlands for birds, as well as enable the monitoring of iconic species such as hedgehogs to inform projects to reverse their decline.
Place	West London Waste Authority	Food Waste Project	Y	£141,740	The project is underway. Bins purchased and being delivered to housing sites. The remaining funding will be used to fund the additional revenue costs during the pivot.
Place	Thames Water	SWC Crane Harrow Flood Resilience	Y	£33,500	Grant funding to complete flood risk study and wetland modelling phase 1 in the river crane catchment
Place	Thames Water	SWC Crane Harrow Flood Resilience Part 2	Y	£30,000	For Harrow Council lead local flood authority to complete flood risk and wetland modelling for the smarter water catchment project
Place	TfL	Cycle training in Q1 (April – June inclusive)	Y	£20,000	To deliver Bikeability and Cycle Skills training
Place	TfL	TfL Support Costs (TBC)	Y	£40,000	Funding provided to support staffing and/or ongoing project costs (revenue)
Place	DLUHC	Homelessness Prevention Grant	Y	£2,246,458	to give local authorities control and flexibility in managing homelessness pressures and supporting those who are at risk of homelessness
Place	DLUHC	Rough Sleeping Initiative	Y	£221,944	support for rough sleepers. £221,944 is the allocation for this year which we expect to be reduced by the amount of £32,571 which was carried forward from 21-22
Place	DLUHC	Domestic abuse Act new burdens	Y	£30,884	to cover the cost of new burdens associated with the expansion of priority need to those forced into homelessness by domestic abuse
Place	DLUHC	Domestic Abuse Accommodation Based Support	Y	£35,230	To support local authorities to provide accommodation based support to victims of domestic abuse and their children
Place	DLUHC	Mayor's Rough Sleeping Accommodation Programme	Y	£124,548	To support Rough sleepers into longer term accommodation to enable them to transition to independent living.

Directorate	Awarding Body	Grant Name	Ringfenced Y/N	Value	Purpose of grant
Place	Arts Council	Cultural Recovery Fund Round 3 (final payment)	Y	£110,366	To support the recovery of cultural activities in Harrow Arts Centre, Harrow Museum and Harrow Music Service
Place	Sport England	National Leisure Recovery Fund	Y	£50,000	Funding for the development of a new Indoor and Outdoor Sports Facility Strategy as agreed by CSB. Funding carried forward from 21/22
Place	London Youth Games	LYG Give Back	Y	£3,778	London Youth Games only ran a summer festival last year and not the full campaign due to Covid-19 and lockdowns
Place	London Youth Games	LYG Sports Development	Y	£3,500	Funding to provide activity sessions for young people in the borough to develop life skills, build connections with their communities, and support positive mental well-being
Place	Arts Council	Music Education Grant	Y	£338,179	To support the delivery of activities from Music Hub
Place	Arts Council	Jubilee Library Grant	Y	£1,000	Funding to support the Queen's Jubilee celebrations
Place	John Lyon	John Lyon Music Bursary Funding	Y	£9,850	Year 2 of the funding towards supporting pupil bursaries
Place	Hertfordshire Music Service	Changing Tracks Hertfordshire Youth Music Grant	Y	£750	To support the project work carried out between the Harrow and Hertfordshire Music Services
Place	The Royal Society	2022/23 Headstone Manor Museum - The Royal Society	Y	£3,500	To support the running of Headstone Manor Museum
Place	The National Lottery Heritage Fund	HLF Archive Conservation Project	Y	£85,000	The final claim payment for the HLF refurbishment project was received in 2021/22. Part of this grant is earmarked for the archive conservation project, however this could not be completed in the 2021-22 financial year due to COVID related delays but there is a statutory obligation for the work to be completed.
Place	DWP	Kickstart	Y	£89,827	Kickstart Programme is to support young people into paid work placements by providing a subsidy to employers. The DWP grant funding will be used to continue to forward DWP NMW salary payments to Kickstart employers to pay Kickstarters.
Place	DWP	Harrow Brokerage Programme	Y	£98,048	To deliver training on skills and job support
Place	West London Alliance	Strategic Investment Pot - Businesses & Skills Funding	Y	£88,887	The works have been committed and will continue into 2022/23, to provide support to residents on skills and apprenticeship and to support entrepreneurs and micro businesses.
Place	West London Alliance	Strategic Investment Partnership	Y	£80,868	The WLA Strategic Investment Pot - Using Public Assets to Unlock Digital Infrastructure project "Enabling Fund" will be used to support the delivery of digital infrastructure in the borough. Cabinet approved the draft Digital Infrastructure Strategy for consultation with external stakeholders in Dec 2021. This ring fenced funding cannot be used for other purposes. It will be used to support the delivery of Digital Infrastructure Strategy and the newly created post of Digital Infrastructure Lead Officer which is a 3 year fixed term post, starting from April 2022.
Place	DEFRA	Biodiversity Net Gain	Y	£10,047	The grant relates to supporting the Council to meet its statutory obligations relating to Biodiversity Net Gain under the Environment Act 2021. The grant has just been awarded and the Government is insisting that it is invoiced for / paid by the end of financial year, so it is not practical to spend the grant within the financial year, so it therefore needs to be carried forward (from 21/22)

Directorate	Awarding Body	Grant Name	Ringfenced Y/N	Value	Purpose of grant
Place	Heat Network Delivery Unit	HNDU Support	Y	£48,000	Work on potential heat network serving the main Council regeneration sites was put on hold as part of the broader review of the Regeneration programme. Consequently the work proposed to be undertaken using this grant was not progressed in 2019/20 - 2021/22. Heat network considerations form part of the newly appointed Harrow Strategic Development Partner and also Local Plan review / climate emergency, so grant likely to be spent on 2022/23. Grant condition requires it to be spent on heat network / carbon investigations.
Resources	DLUHC	MHCLG Local Council Tax Support Schemes Grant		545,000	this is c/f for Council Tax hardship support
Resources	DLUHC	Test/Trace Support Payment Scheme PLPYJ0021531		268,785	Self isolation payment - £500 per person for each claimant needing to stay at home
Resources	DWP	Rent Rebate Subsidy	Y	25,680,554	as received in 20/21 – DWP subsidy paid to local authority to cover the cost of Housing Benefit paid to local authority tenants who are paid Housing Benefit by the LA via means testing
Resources	DWP	Rent Allowance Subsidy	Y	91,109,269	as received in 20/21– DWP subsidy paid to local authority to cover the cost of Housing Benefit paid to privately renting tenants who are paid Housing Benefit by the LA via means testing
Resources	DLUHC	Local Council Tax Support Administration 31/6145	Y	256,554	To compensate local authorities for the cost of administering local council tax support
Resources	DLUHC	local council tax support schemes grant (2021-22) [No 31/5550].		2,326,514	The grant is provided towards expenditure incurred, or to be incurred, in respect of the provision of local council tax support in 2021-22.
Resources	DLUHC	Community Champions Fund		49,000	received in 20/21 -to support small organisations in our less engaged communities to promote vaccination messaging within their communities (e.g. Romanian, Tamil, Somali, etc). Remaining amount c/f to 22/23 £49k
Resources	Home Office	Vulnerable Person Resettlement Scheme	Y	105,000	to fund resettlement cost ( admin, support officer) for refugee families
Resources	Home Office	Afghan Resettlement	Y	1,005,000	To fund resettlement costs (including staffing costs) for qualifying Afghan refugee families (over the three year funding period (for 10 families currently resettled in Harrow)
Resources	DLUHC	Domestic Abuse Grant	Y	167,050	Funds Complex Needs project which supplements the domestic abuse contract and funds requirements to ensure compliance with new Domestic Abuse Bill duties
Resources	MOPAC	Violence Reduction Unit/London Crime Prevention Fund	Y	293,449	To fund Community safety and crime prevention activity including domestic violence and serious violence co-ordinator
Resources	DWP	Household Support Fund		2,953,414	To support households in the most need particularly those including children and pensioners who would otherwise struggle with energy bills, food and water bills.
Resources	DLUHC	Homes for Ukraine	Y	2,341,500	To support Ukrainian families fleeing the war
Resources	MOPAC	Violence Reduction Unit	Y	50,000	To fund Community safety and crime prevention activity including Domestic Violence and Violence Against Women & Girls Coordinator
				<b>£367,817,855</b>	

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Summary of Revenue Carry Forwards 2022-23

Appendix 2

Division	Description	£
Inc Economy, Culture and Leisure	London Youth Games 'Give Back' grant scheme	3,778
Inc Economy, Culture and Leisure	One-off fee income received from amateur Sports Clubs in 2022/23 following the resolution of outstanding queries on F&Cs.	44,100
Inc Economy, Culture and Leisure	The National Archives, Archives Testbed: Sustainability Grant - 'Our Journey, Our Harrow' project	9,400
Inc Economy, Culture and Leisure	The Royal Society grant - Places of Science 2022 project	1,235
Inc Economy, Culture and Leisure	Ward Priority Fund - South Harrow gate and Wealdstone North gate	6,643
Inc Economy, Culture and Leisure	Donation from Friends of Harrow Museum for conservation materials	503
Housing	Green Homes Grant	21,965
Inc Economy, Culture and Leisure	Funding of £50k for the development of a new Indoor and Outdoor Sports Facility Strategy originally set aside from the National Leisure Recovery Fund funding as agreed by CSB during 21/22	24,895
Inc Economy, Culture and Leisure	HLF - Headstone Manor and Museum - Archive Conservation Project	15,467
Inc Economy, Culture and Leisure	DWP - Harrow Brokerage Programme	89,234
Inc Economy, Culture and Leisure	West London Alliance - Strategic Investment Pot - Enabling Fund Digital	78,015
Inc Economy, Culture and Leisure	West London Alliance - Strategic Investment Pot - Businesses & Skills funding	47,966
Environment	GLA - Business Friendly Licensing grant	25,000
Environment	West London Waste Authority - Food Waste project funding	36,646
Regeneration & Development	DEFRA - Biodiversity Net Gain (2022/23)	15,613
Regeneration & Development	Environment Agency - Yeading Brook	27,000
Regeneration & Development	DEFRA - Biodiversity Net Gain (21/22 grant)	10,047
Regeneration & Development	Grant from Heat Network Delivery Unit (HNDU) (former Department of Energy and Climate Change)	34,000
ICT	MS licensing - Phoenix contract renewal & true-up	51,000
Strategy - Policy and Partnership	MOPAC finding	75,671
Strategy - Policy and Partnership	Household Support Fund	65,175
Legal and Governance	ULEZ - funds to cover potential legal cost (on behalf of Harrow and partners) of ULEZ challenge	100,000
Legal and Governance	Legal income not allocated Vale Weasborough	16,440
Legal and Governance	Legal IT development	200,000
Suspense Income	Income held on suspense to be allocated in 2023-24	397,064
<b>Total Carry Forwards 2022-23</b>		<b>1,396,857</b>

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Capital Programme 2022/23

Appendix 3

Project Title	Revised Budget	Outturn	Budget Variance	Outturn variance split			Over/ Underspend after			Reason for variance
				Grant Funding/CiL / S106	Harrow Borrowing	Slippage to 23/24	Underspend after Slippage	Grant Funding/CiL / S106	Harrow Borrowing	
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	
<b>Resources:</b>										
Devolved IT Applications	3,464	945	(2,519)	0	(2,519)	(2,519)	0	0	0	Planned spend in 2023/24, the capital scheme was reprofiled to be spent in 2023/24. The project go live will be in 2023/24.
Digital Improvements Programme	1,178	144	(1,034)	0	(1,034)	(1,034)	0	0	0	Planned spend in 2023/24, the capital schemes included within this allocations are reprofiled to be spent in 2023/24. The project go live will be in 2023/24.
Enterprise Resource Planning System	922	919	(3)	0	(3)	(3)	0	0	0	Project delivered
Enterprise Resources Planning TT	762	278	(484)	0	(484)	(484)	0	0	0	Planned spend in 2023/24, the capital scheme was reprofiled to be spent in 2023/24. The project go live will be in 2023/24.
Ongoing ICT Refresh and Enhancements	3,555	1,354	(2,200)		(2,200)	(2,200)	0	0	0	Planned spend in 2023/24, the capital scheme was reprofiled to be spent in 2023/24 and there is a commitment (PO 6500256216) towards the implementation of the next phase of Civica Digital 360 system upgrade , Azure, Lan Hardware part 2 and Hybrid committe meetings system.
Other Schemes (Council wide)	2,249	0	(2,249)	0	(2,249)	(2,249)	0	0	0	A report was approved by cabinet on 20th April 2023 which sets out a requirement to spend circa £1.7m on Critical Works to Sancroft Care Home. The report set out that this would be funded from the existing Capital Programme from the 'Council Wide Schemes.' Therefore, the full £2.2 m will be carried forward budget from 2022/23 to meet these costs of £1.7m at Sancroft with the remainder being carried forward to retain a council wide capital allocation.
<b>Total Resources Directorate</b>	<b>12,129</b>	<b>3,641</b>	<b>(8,488)</b>	<b>0</b>	<b>(8,488)</b>	<b>(8,488)</b>	<b>0</b>	<b>0</b>	<b>0</b>	
<b>People's Directorate:</b>										
<b>Adults:</b>										
Assistive Technology	270	0	(270)	0	(270)	(270)	0	0	0	Slippage as will be required going forward under the New Operating model in Adults which will create new pathways were investment in technology will be required
In-House Residential	88	(2)	(89)	0	(89)	(87)	(2)	0	(2)	Underspend caused due to transfer of some expenditure (Vaughan Party wall ) from capital to revenue
<b>Total Adults</b>	<b>358</b>	<b>(2)</b>	<b>(359)</b>	<b>0</b>	<b>(359)</b>	<b>(357)</b>	<b>(2)</b>	<b>0</b>	<b>(2)</b>	
<b>Public Health:</b>										
Healthy Pupil Capital Fund	7	6	(1)	(1)	0	(1)	0	0	0	Slippage as the consequences of not carrying over means that schools will not have benefited from all the grant. We will use the funding for supplies for physical activity in schools.
<b>Total Public Health</b>	<b>7</b>	<b>6</b>	<b>(1)</b>	<b>(1)</b>	<b>0</b>	<b>(1)</b>	<b>0</b>	<b>0</b>	<b>0</b>	

Project Title	Revised Budget	Outturn	Budget Variance	Grant Funding/CiL / S106	Harrow Borrowing	Slippage to 23/24	Underspend after Slippage	Grant Funding/CiL / S106	Harrow Borrowing	Reason for variance
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	
<b>Schools:</b>										
Additional Basic Need Funding	14,974	0	(14,974)	(14,974)	0	(14,974)	0	0	0	Current projections for mainstream school places indicate there is not a requirement for permanent expansion at this stage
Bulge Classes	552	0	(552)	(552)	0	(552)	0	0	0	There are no current bulge class requirements but may be needed in 2023-24
Childrens IT Development	135	0	(135)	0	(135)	(129)	(6)	0	(6)	Funding slipped to future years to support service redesign
Childrens Services Buildings Programme Works	2	1	(1)	0	(1)	0	(1)	0	(1)	Building works completed
Devolved Formula Non VA Schools	53	0	(53)	(53)	0	(53)	0	0	0	Funding to be passported to schools
School Amalgamation	285	242	(43)	(43)	0	(43)	0	0	0	Project underway due for completion Summer 2023
Schools Capital Maintenance	7,240	2,500	(4,741)	(4,741)	0	(4,741)	0	0	0	Rolling programme of maintenance
Schools Expansion Programme - Phase 2	23	0	(23)	(23)	0	(23)	0	0	0	Ringfenced grant funding slipped to future years
SEN Expansion	5,286	518	(4,768)	(4,768)	0	(4,768)	0	0	0	Majority of funding is committed, projects underway and due for completion Summer 2023
<b>Total Schools</b>	<b>28,552</b>	<b>3,261</b>	<b>(25,290)</b>	<b>(25,154)</b>	<b>(136)</b>	<b>(25,283)</b>	<b>(7)</b>	<b>0</b>	<b>(7)</b>	
<b>Total People's Directorate</b>	<b>28,915</b>	<b>3,265</b>	<b>(25,650)</b>	<b>(25,155)</b>	<b>(495)</b>	<b>(25,641)</b>	<b>(9)</b>	<b>0</b>	<b>(9)</b>	
<b>Place Directorate:</b>										
<b>Environment:</b>										
CA Site Infrastructure	153	0	(153)	0	(153)	(153)	0	0	0	CCTV cameras installation at the site underway. The remaining budget to be carried forward to fund H&S related works.
Carbon Offset Fund	40	0	(40)	(40)	0	(40)	0	0	0	Solar PV installation at Grimsdyle School underway. The remaining budget to be carried forward to fund further energy efficiency projects
CCTV cameras and equipment at the depot	50	45	(5)	0	(5)	(5)	0	0	0	The remaining budget to be carried forward to fund additional CCTV cameras as part of corporate flagship actions.
CCTV Infrastructure	1,243	866	(376)	0	(376)	(376)	0	0	0	The remaining budget to be carried forward to complete the CCTV room fit out and to fund additional CCTV cameras.
Climate Emergency - Energy emissions reduction measures	250	0	(250)	(250)	0	(250)	0	0	0	A number of solar PV installation projects at corporate buildings are underway. The remaining budget to be carried forward to fund further energy efficiency projects.
Depot Redevelopment	3,439	1,117	(2,322)	0	(2,322)	(2,322)	0	0	0	The remaining budget to be carried forward to fund external works (pending the completion of design and options) and other outstanding commitments.
Flood Defence & Highways Drainage	597	453	(144)	(144)	0	(144)	0	0	0	Delay in Environment Agency approval of partnership funding, the remaining budget will be committed in 2023/24 as the project is now ready for delivery construction phase
Highway Improvement Programme	7,566	1,115	(6,452)	0	(6,452)	(6,452)	0	0	0	Budget committed for the delivery of highway schemes following the approval of Highways Investment Strategy
Litter Bin Project	18	18	0	0	0	0	0	0	0	
Parking Management Programme	445	318	(127)	0	(127)	(127)	0	0	0	Works are on-going following schemes approval at TARSAP
Parks Infrastructure	821	201	(620)	0	(620)	(614)	(6)	0	(6)	A programme of works was drawn up in late 2022, delivery is scheduled for 23/24



Project Title	Revised Budget	Outturn	Budget Variance	Grant Funding/CiL / S106	Harrow Borrowing	Slippage to 23/24	Underspend after Slippage	Grant Funding/CiL / S106	Harrow Borrowing	Reason for variance
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	
Parks Playground Improvement	46	0	(46)	(46)	0	(46)	0	0	0	Works included in the Parks Infrastructure programme, including improvement works at Green Flag parks
Public Sector Decarbonisation Scheme	2,058	1,533	(525)	(275)	(250)	(525)	0	0	0	Energy efficiency projects underway, scheduled to be completed in 2023/24
Street Lighting Improvement Programme	2,199	735	(1,464)	0	(1,464)	(1,464)	0	0	0	Budget to be carried forward to continue the lighting replacement programme. Works underway.
TfL Transport Capital (LIP)	1,391	0	(1,391)	(1,391)	0	0	(1,391)	(1,391)	0	22/23 LIP funding was allocated to and spent against revenue account
Vehicle Procurement	136	0	(136)	0	(136)	(136)	0	0	0	No vehicle replacement took place in 22/23. Budget to be carried forward to fund vehicles due for replacement in 23/24
Waste and Recycling	4	0	(4)	0	(4)	0	(4)	0	(4)	No outstanding work, hence an underspend
Waste Services bins (Trade)	118	115	(3)	0	(3)	0	(3)	0	(3)	No outstanding bin orders, hence an underspend
Wealdstone Future High Street Fund (FHSF)	5,868	132	(5,736)	(5,736)	0	(5,736)	0	0	0	Project Adjustment recently approved by DLUHC to deliver projects in Harrow Town Centre instead. The remaining external funding to be committed by March 2024
Wealdstone Major Transport Infrastructure	962	728	(234)	0	(234)	(234)	0	0	0	Works are on-going. Budget to be carried forward to fund existing commitments
WLWA Food Waste Project	335	335	0	0	0	0	0	0	0	
<b>Total Environment</b>	<b>27,738</b>	<b>7,710</b>	<b>(20,028)</b>	<b>(7,882)</b>	<b>(12,146)</b>	<b>(18,624)</b>	<b>(1,404)</b>	<b>(1,391)</b>	<b>(13)</b>	
<b>Inclusive Economy, Leisure &amp; Culture:</b>										
Harrow Arts Centre	1,986	1,349	(637)	(637)	0	(637)	0	0	0	Building works are on-going, scheduled to be completed in Q1
Harrow Arts Centre Capital Infrastructure	73	29	(43)	0	(43)	(44)	0	0	0	Budget set aside for main roof repair, the cost of which would require budget allocated for 23/24 together to complete the work
Harrow High Street Fund	2,868	816	(2,052)	(1,025)	(1,027)	(1,164)	(887)	(387)	(500)	New programme of activities agreed with Members and delivery is scheduled for 2023/2024, utilising £1.165m slippage. The underspend of £387k is a result of reclassifying spend from capital to revenue (hanging baskets and mock shop front), and the underspend of £500k is a surplus to the programme.
Libraries and Leisure Capital Infrastructure	282	161	(121)	0	(121)	(114)	(7)	0	(7)	Delay in works commencing at Harrow Leisure Centre due to Everyone Active co-ordinating these works with other essential health and safety works relating to the control of legionella. Budget to be carried forward to fund existing commitments
Libraries Self-Service Kiosks Refresh	113	110	(2)	0	(2)	0	(2)	0	(2)	Project completed
Lyon Rd Pop Restaurant & Square	188	188	0	0	0	0	0	0	0	
Sec 106 Banister Sport Pitch	270	256	(14)	0	(14)	(10)	(4)	0	(4)	Remaining electrical works still to be completed and paid. Budget needed for this payment.
Tennis Infrastructure	587	36	(551)	(551)	0	(551)	0	0	0	Tennis court refurbishment works scheduled for early 2023/24, budget to be carried forward to fund contract costs

Project Title	Revised Budget	Outturn	Budget Variance	Grant Funding/CiL / S106	Harrow Borrowing	Slippage to 23/24	Underspend after Slippage	Grant Funding/CiL / S106	Harrow Borrowing	Reason for variance
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	
UK Shared Prosperity Fund	141	116	(25)	(25)	0	(25)	0	0	0	Grant agreement signed in late 2022/23. 3 year programme, delivery scheduled for 23/24
<b>Total Inclusive Economy, Leisure &amp; Culture</b>	<b>6,508</b>	<b>3,063</b>	<b>(3,446)</b>	<b>(2,238)</b>	<b>(1,207)</b>	<b>(2,546)</b>	<b>(900)</b>	<b>(387)</b>	<b>(513)</b>	
<b>Regeneration &amp; Development:</b>										
Accommodation Strategy	1,473	944	(529)	0	(529)	(529)	0	0	0	Works are on-going to provide ancillary space following Civic Centre closure
Bannisters Former Civil Defence Building	257	0	(257)	0	(257)	(257)	0	0	0	Project put on hold, pending review of the Café concept / more commercially viable alternatives
Demolition of Social club	0	0	0	0	0	0	0	0	0	
Harrow Green Grid	170	170	0	(0)	0	0	(0)	(0)	0	
Harrow Weald Toilet Block	14	0	(14)	0	(14)	0	(14)	0	(14)	Project completed
High Priority Plan Maintenance Corporate Property	1,472	160	(1,312)	0	(1,312)	(1,312)	(0)	0	(0)	Building improvement works to be prioritised, pending the completion of Strategic Asset Management Plan (SAMP)
Investment in 3 core sites	10,198	0	(10,198)	0	(10,198)	(10,198)	0	0	0	The slippage is carried forward for £9,905m capital investment required for Grange Farm Phase 3 (private sale homes). Planning and design fees of £830, as per cabinet approval Nov 2022.
Investment in HNC	2,070	0	(2,070)	0	(2,070)	(2,070)	0	0	0	HSDP revised models being reviewed
Neighbourhood CiL Schemes	928	209	(719)	(719)	0	(466)	(254)	0	(254)	Works are on-going for NCIL projects already approved. Uncommitted budget to be carried forward to fund new NCIL applications in 23/24. Some previously approved projects were withdrawn during 22/23, resulting in an underspend which is returned to NCIL pot for further allocations
New Planning IT system	0	0	0	0	0	0	0	0	0	
Other Regeneration	0	0	0	0	0	0	0	0	0	
Plot S	0	0	0	0	0	0	0	0	0	
Haslam House Redevelopment	26	0	(26)	0	(26)	0	(26)	0	(26)	Project completed
Waxwell Lane Development	980	773	(207)	0	(207)	(207)	0	0	0	Complete existing commitments before the sales progress in Summer
<b>Total Regeneration &amp; Development</b>	<b>17,588</b>	<b>2,254</b>	<b>(15,334)</b>	<b>(719)</b>	<b>(14,615)</b>	<b>(15,040)</b>	<b>(294)</b>	<b>(0)</b>	<b>(294)</b>	
<b>Housing General Fund:</b>										
Disabled Facilities Grants	2,809	1,154	(1,655)	(1,655)	0	(1,655)	0	0	0	The service is currently undergoing a peer review to establish best practice and efficiencies and effective ways of allocating the DFG budget allocation.
Empty Property Grant	120	50	(70)	0	(70)	0	(70)	0	(70)	The buy to let market has become less viable for many landlords due to taxation and high interest rates. This has led to shortage in private sector rental properties. Market rent levels have increased significantly compared to LHA rates making Harrow less competitive

Project Title	Revised Budget	Outturn	Budget Variance	Grant Funding/CiL / S106	Harrow Borrowing	Slippage to 23/24	Underspend after Slippage	Grant Funding/CiL / S106	Harrow Borrowing	Reason for variance
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	
Property Acquisition Programme	7,500	4,251	(3,249)	0	(3,249)	(2,443)	(806)	0	(806)	Carried forward £2.443m into 2022/23 for the completion of the acquisition of the remaining 7 properties within the programme, which will conclude in 2023/24. £806k compensates for the transfer of a property (Torbay Rd) to the Property Acquisition Programme.
<b>Total Housing General Fund</b>	<b>10,429</b>	<b>5,455</b>	<b>(4,974)</b>	<b>(1,655)</b>	<b>(3,319)</b>	<b>(4,098)</b>	<b>(876)</b>	<b>0</b>	<b>(876)</b>	
<b>Total Community Directorate</b>	<b>62,263</b>	<b>18,482</b>	<b>(43,781)</b>	<b>(12,494)</b>	<b>(31,288)</b>	<b>(40,307)</b>	<b>(3,474)</b>	<b>(1,778)</b>	<b>(1,696)</b>	
<b>Total General Fund</b>	<b>103,307</b>	<b>25,388</b>	<b>(77,920)</b>	<b>(37,649)</b>	<b>(40,272)</b>	<b>(74,436)</b>	<b>(3,483)</b>	<b>(1,778)</b>	<b>(1,705)</b>	
<b>Housing Revenue Account:</b>										
Building Council Homes For Londoners (includes infill)	18,646	1,846	(16,801)	(12,853)	(3,947)	(7,472)	(9,329)	(11,716)	2,388	Schemes have been reviewed and it is not possible to achieve start on site on some projects by 31 March 2023 resulting a slippage of £7.472 into 2023/24 and an underspend of £9.329m. GLA funding no longer available -hence additional borrowing required to fund carry forward
Grange Farm phase 1	8,834	6,383	(2,451)	(1,547)	(904)	(2,451)	0	0	0	The completion of works has slipped to June 2023. The budget is required to fund existing commitments.
Grange Farm phase 2	2,270	51	(2,219)	(1,812)	(407)	(1,411)	(809)	(809)	0	This budget was set aside for acquisition of property within Phase 2 and is now no longer required. It is proposed to use £1.00m of this budget in 2023/24; £0.500m to top up the budget set aside for the acquisition of the 20 Notting Hill Genesis properties and £0.500m set aside for client side costs not budgeted for. Cabinet in November 2022 agreed the reprofile of Phase 2 of Grange farm to be delivered via Harrow Strategic Development Partnership, £411k. Due to late start, the budget is required in 23/24.
Grange Farm phase 3	312	30	(282)	(282)	0	(225)	(57)	(57)	0	This was set aside for Phase 3 commencing in 2022-23. Following a review, this phase will only be taken to planning and the budgets have been reprofiled accordingly, with £225k slippage into 23/24 and £57k being no longer required.
Grange Farm Infrastructure and Costs	4,878	0	(4,878)	0	(4,878)	(4,878)	0	0	0	This budget relates to the client side costs in relation to phases 2 and 3 of the Grange farm regeneration programme and is required in full in 2023/24.
Housing IT Scheme	971	643	(329)	(329)	0	(329)	0	0	0	Reprofiling of expenditure in 2022/23 to 2023/24 to reflect re-phasing of the project go live date has resulted in this expenditure being slipped into 2023/24.
Mayor's Rough Sleeping Accommodation Programme	382	268	(114)	(114)	0	0	(114)	(114)	0	Project completed
Planned Investment Programme	16,560	5,768	(10,792)	(10,792)	0	(7,592)	(3,200)	(3,200)	0	Slippage of £7.592m arose across various projects within the programme due to programming delays, procurements delays and the delay in delivery of materials resulting in slippage of projects into 23/24.
<b>Total HRA</b>	<b>52,854</b>	<b>14,989</b>	<b>(37,866)</b>	<b>(27,729)</b>	<b>(10,136)</b>	<b>(24,357)</b>	<b>(13,508)</b>	<b>(15,896)</b>	<b>2,388</b>	
<b>Total General Fund + HRA</b>	<b>156,162</b>	<b>40,376</b>	<b>(115,785)</b>	<b>(65,378)</b>	<b>(50,407)</b>	<b>(98,793)</b>	<b>(16,992)</b>	<b>(17,674)</b>	<b>682</b>	

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## **Appendix 4 – Council Trading Company Update 2022/23**

### **Introduction**

1. As at Quarter 4 2022/23, the Council’s trading structure consists of five separate legal entities set out in table 1 below and presented as a flow chart at the end of this report along with detailed financial results.

**Table 1: Harrow Council Trading Structure**

<b>Name</b>	<b>Legal Structure</b>	<b>Date Started Trading</b>
Concilium Group Limited (Holding Company)	UK Limited Company	November 2015
Concilium Business Services Limited	UK Limited Company	November 2015
Sancroft Community Care Limited	UK Limited Company	January 2018
Concilium Assets LLP	Limited Liability Partnership	January 2019
Harrow Strategic Development Partnership LLP	Limited Liability Partnership	March 2021

2. These entities have been set up to provide a financial or other benefit to the Council whilst enabling it to undertake specific commercial activities.
3. The Council’s interests in these entities are not material for the purposes of the financial statements. The Council’s financial statements do not therefore include group accounts.

### **Background**

4. Concilium Group Ltd. is a wholly owned commercial subsidiary of the Council, set up with the dual purpose of consolidating the financials of its subsidiaries and to act as the minority partner in a Council controlled Limited Liability Partnership (Concilium Assets LLP). For reporting purposes, Concilium Group Limited is classified as a dormant entity.
5. Concilium Business Services Ltd is a wholly owned subsidiary of Concilium Group Ltd. Until February 2019 its principal source of revenue came from the property management of 100 homes, managed on behalf of Harrow Council. Concilium Business Services Limited has now been dissolved at the end of 2022/23 and the remaining properties have been transferred to Concilium Group Ltd.
6. Sancroft Community Care Ltd is a wholly owned subsidiary of Concilium Group Ltd. The company took over the operation of the residential care home for the elderly situated on Sancroft Road, Harrow on 8<sup>th</sup> February 2018. Of the care home’s 62 beds, 45 are block contracted with the London Borough of Harrow for five years.

7. Concilium Assets LLP is a Limited Liability Partnership owned 95% by Harrow and 5% by Concilium Group Ltd, set up to enable direct private rental sector (PRS) property investment activities. 53 PRS units on Gayton Road were transferred to the LLP in July 2019 on a 10 year lease for rent to the private market.
8. Harrow Strategic Development Partnership LLP (HSDP LLP) is a Limited Liability Partnership owned 50% by Harrow and 50% by Wates Construction Limited, set up to facilitate the development of Council assets at Poets Corner, Peel Road and Byron Quarter phase 1 as per the Council's Regeneration Programme. The Council's investment in the LLP will primarily be the transfer of the land once individual schemes are ready to commence.

## **Financial Implications**

9. The accounting year end for all of these entities is 31<sup>st</sup> March in line with the Council's year end. This report references detail for financial years ended 2023 along with a summary for financial years ended 2024.
10. The financial position for the companies for the year ending 31st March 2022 is summarised in Table 4. Financial accounts have been prepared for the year ended 31<sup>st</sup> March 2022 for Sancroft Community Care Limited, Concilium Business Services Ltd and Concilium Assets LLP and the audits for Sancroft Community Care Limited and Concilium Assets LLP have been completed. Financial accounts for Concilium Group have been prepared for the year ended 31<sup>st</sup> March 2022 and the audit has been completed.
11. The detailed annual position to 31<sup>st</sup> March 2023 for the council's trading structure has been summarised in Table 5. These figures have not yet been subject to audit.
12. The annual forecast position for the council's trading structure has been summarised in Table 6. The table covers financial years 2020/21 to 2023/24 in line with the respective business plans.

## **Sancroft Community Care Ltd**

13. The audited financial information for Sancroft Community Care Ltd for the year ending 31st March 2022 is summarised in Table 4 at the end of this report. A financial summary of Sancroft's performance against its business plan (budget) for 2022/23 is presented in Table 2 below.

**Table 2: Sancroft Unaudited Annual Position as at 31<sup>st</sup> March 2023**

<i>Negative/(Positive)</i>	Full year Actual	Annual Budget	Forecast Budget Variance
Total Income	(2,837,000)	(2,673,000)	(164,000)
Total Expenditure	2,636,000	2,522,000	114,000
(Net Profit)/Loss	(201,000)	(151,000)	(50,000)

14. Costs have been controlled despite pressures relating to increase in the price of essential supplies and recruiting/retaining staff.

## Concilium Assets LLP

15. The audited financial information for Concilium Assets LLP for the year ending 31<sup>st</sup> March 2022 is summarised in Table 4 at the end of this report. A financial summary of the LLP's performance against its business plan (budget) for 2022/23 is presented in Table 3 below.

**Table 3: LLP Unaudited Annual Position as at 31<sup>st</sup> March 2023**

<i>Negative/(Positive)</i>	Full year Actual	Annual Budget (B-Plan)	Forecast Budget Variance
Total Income	(1,152,139)	(1,104,619)	(47,520)
Total Expenditure*	1,126,649	1,092,188	34,461
<b>(Net Profit)/Loss</b>	<b>(25,490)</b>	<b>(12,431)</b>	<b>(13,059)</b>

\* See paragraphs 18 - 20 below

16. The Council charges the LLP 33% of its turnover (the lease rent) which is accounted for as an expense in the accounts of the LLP. This expense was not included in the original business plan however it has been reflected in the refreshed business plan approved by Cabinet on 23<sup>rd</sup> September 2021. The lease rent is a direct benefit to the Council and is included in the MTFS.

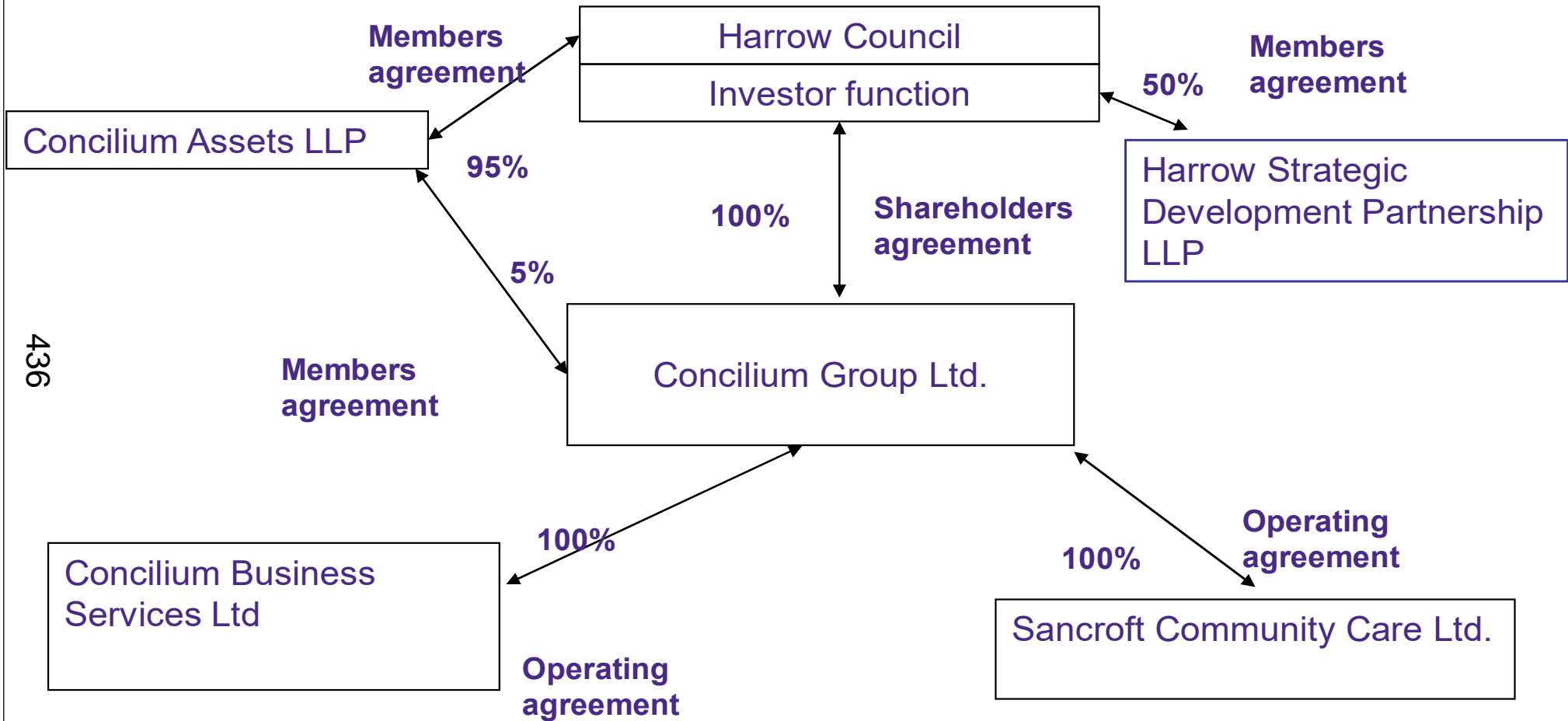
17. The LLP accounts for 2019/20 include a technical adjustment spreading lease rent payments to the Council over the full term of the lease rather than accounting for them on a cash basis.

18. Any remaining profit is distributed back to the council as a dividend. The position for the LLP including these distributions is published in the business plan and included in the council's MTFS. The amount paid to the Council in respect of lease rent and dividend for 2022/23 is £580k (it was £406k in 2021/22).

## **Funding Arrangements**

19. Concilium Assets LLP was granted a start-up loan of £175,000 which was fully drawn down in 2019. An additional short term loan facility to the LLP of up to £250k was approved by Cabinet in July 2019 of which only £100k was drawn down. These loans were repaid in full before March 2020, ahead of business plan projections.

# Harrow Council Commercial Structure





**Table 4: Trading Structure Full Year Position to 31<sup>st</sup> March 2022 - audited**

£ Negative/( £ Positive)	Concilium Business Services Ltd	Concilium Group Ltd	Sancroft Community Care Ltd	Concilium Assets LLP	Aggregate Position
Income	(43,277)	0	(2,628,177)	(1,106,579)	(3,778,033)
Direct and Administrative Expenditure	46,346	6,163	2,411,543	922,940	3,386,992
(Net Profit)/Loss	3,069	6,163	(216,634)	(183,639)	(391,041)
Retained Earnings c/f	(12,165)	13,987	(272,634)	(127,940)	(398,752)

**Table 5: Trading Structure Full Year Actual to 31<sup>st</sup> March 2023 - unaudited**

£ Negative/( £ Positive)	Concilium Business Services Ltd	Concilium Group Ltd	Sancroft Community Care Ltd	Concilium Assets LLP	Aggregate Position
Income	(31,400)	(10,261)	(2,725,000)	(1,152,139)	(4,030,800)
Direct and Administrative Expenditure	18,884	6,000	2,636,000	1,126,649	3,799,699
Final transfer on Liquidation	24,680	(24,680)	N/A	N/A	0
(Net Profit)/Loss	12,165	(28,941)	(201,000)	(25,490)	(231,101)
Retained Earnings c/f	(0)	(14,954)	(473,634)	(153,430)	(629,853)

**Table 6: Trading Structure Full Year Forecast for MTFS**

£ Negative/( £ Positive)	Concilium Business Services Ltd	Concilium Group Ltd	Sancroft Community Care Ltd	Concilium Assets LLP	Aggregate Position
Retained Earnings b/f	(15,234)	7,824	(56,000)	55,700	(7,710)
(Net Profit)/Loss - 2021/22	3,069	6,163	(216,634)	(183,639)	(391,041)
(Net Profit)/Loss - 2022/23	12,165	(28,941)	(201,000)	(25,489)	(243,266)
(Net Profit)/Loss - 2023/24	-	(6,346)	-	(43,074)	(49,420)
Retained Earnings c/f	-	(21,300)	(473,634)	(196,053)	(691,437)

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**Report for: Cabinet**

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<b>Date of Meeting:</b>	27 July 2023
<b>Subject:</b>	Treasury Management Annual Outturn Report 2022/23
<b>Key Decision:</b>	No
<b>Responsible Officer:</b>	Dawn Calvert - Director of Finance and Assurance
<b>Portfolio Holder:</b>	Councillor David Ashton - Portfolio Holder for Finance and Human Resources
<b>Exempt:</b>	No
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All wards
<b>Enclosures:</b>	Appendix 1 - Link Group Economic Commentary Appendix 2 - Borrowing Rate Summary 2022/23 Reference from the Governance, Audit, Risk Management and Standards Committee (5 July 2023)

## Section 1 – Summary and Recommendations

This report sets out the Treasury Management Outturn position for 2022/23.

### **Recommendations:**

Cabinet is requested to:

1. Note the Treasury Management outturn position for 2022/23.

### **Reason: (for recommendations)**

- To promote effective financial management and comply with regulations issued under the the Local Government Act 2003, the CIPFA Code of Practice on Treasury Management, and the CIPFA Prudential Code for Capital Finance, along with meeting the requirements of the Council's Financial Regulations.
- To keep Members informed of Treasury Management activities and performance for 2022/23.

## Section 2 – Report

### 1.0 Background

1.1 The purpose of this report is to present the Council's Annual Treasury Management outturn position for 2022/23 in accordance with the Council's Treasury Management Practices and in compliance with the Chartered Institute of Public Finance and Accountancy's (CIPFA) Treasury Management Code of Practice. The Council has complied with all elements of the Treasury Management Strategy Statement (TMSS) as the treasury management function.

1.2 Treasury management comprises:

- Managing the Council's borrowing to ensure funding of the Council's current and future Capital Programme is at optimal cost;
- Investing surplus cash balances arising from the day-to-day operations of the Council to obtain an optimal return while ensuring security of capital and liquidity.

1.3 The annual revenue budget includes the revenue costs that flow from capital financing decisions. Under the CIPFA Treasury Management Code of Practice and the CIPFA Prudential Code, increases in capital expenditure should be limited to levels whereby increases in interest charges and running costs are affordable within the Council's revenue account.

1.4 The Council regards the successful identification, monitoring and control of risk to be the prime criteria by which the effectiveness of its treasury management activities will be measured. Accordingly, the analysis and reporting of treasury

management activities will focus on their risk implications for the organisation to ensure the security and liquidity of the Council's treasury investments.

- 1.5 The Council recognises that effective treasury management will provide support towards the achievement of its business and service objectives. It is therefore committed to the principles of achieving value for money in treasury management, and to employing suitable comprehensive performance measurement techniques, within the context of the CIPFA Treasury Management Code of Practice.

## 2.0 **Reporting Requirements**

- 2.1 The Council and/or Cabinet are required to receive and approve, as a minimum, three main reports each year, which incorporate a variety of policies, estimates and actuals.

**Treasury Management Strategy Statement Report** – The first, and most important report is presented to the Council in February and covers:

- The Treasury Management Strategy Statement (TMSS), which details how the investments and borrowings for capital expenditure are to be organised, including Treasury Limits and Prudential Indicators.
- The Annual Investment Strategy which forms part of the TMSS, (the parameters on how investments are to be managed).
- the MRP Policy (how capital expenditure is charged to revenue over time).

**The 2022/23 TMSS was presented to Council on 24<sup>th</sup> February 2022.**

**Mid-Year Review Report** – This is presented to Cabinet in December/January and updates Members on the Treasury Management activity of the Authority within within the context of the approved TMSS. This also includes progress of the Capital Programme and reporting on Prudential Indicators to give assurance that the treasury management function is operating within the Treasury Limits and Prudential Indicators set out in the TMSS.

**The 2022/23 Mid-Year Report was presented to Cabinet on 8th December 2022**

**Treasury Management Outturn Report** – This report, typically presented to Cabinet in June/July, provides a review of the treasury management activity over the financial year and includes details of a selection of actual Prudential and Treasury Indicators and actual treasury operations compared to the estimates originally included within the TMSS.

This report fulfills this reporting requirement which is specified in section C93 (ii) in the Financial Regulations.

- 2.2 **Scrutiny** – The above reports are required to be adequately scrutinised, normally before being recommended to Cabinet / Council, with the role being undertaken by the Governance, Audit, Risk Management and Standards Committee

(GARMS). The Council has complied with the CIPFA Treasury Management Code of Practice to the extent that all Treasury Management reports have been scrutinised, though the efficient conduct of the Council's business may require consideration by GARMS subsequent to consideration by Cabinet/Council due to the practicalities of the committee timetable.

- 2.3 The Council has delegated responsibility for the implementation and regular monitoring of its treasury management policies and practices to the Section 151 Officer. The Section 151 Officer chairs the Treasury Management Group (TMG), which monitors the treasury management activity and market conditions monthly.

### 3.0 **Matters covered in the Report**

- 3.1 The Treasury Management Outturn Report for 2022/23 includes a summary of the actual positions in respect of the Authority's:

- Capital Expenditure, Financing and Limits
- Treasury Position as at 31st March 2023
- Summary of 2022/23 Strategy
- Economic update for 2022/23 (Appendix 1)
- Borrowing Rate Summary for 2022/23 (Appendix 2)

### 4.0 **Options considered**

- 4.1 The report is in accordance with the reporting requirements of the CIPFA Treasury Management Code of Practice.

### 5.0 **Treasury Management Outturn Report 2022/23**

- 5.1. The Treasury Management Strategy Statement, (TMSS), for 2022/23 was approved by Council in February 2022 . It stated that for the next three years the Capital Programme would continue to be funded from grants and revenue resources but that substantial borrowing would also be required.

### 6.0 **The Council's Capital Expenditure and Financing**

- 6.1. The Council undertakes capital expenditure on long-term assets. These activities may either be:

- Financed immediately through the application of capital or revenue resources (capital receipts, capital grants, revenue contributions etc.), which has no resultant impact on the Council's borrowing need; or
- If insufficient financing is available, or a decision is taken not to apply resources, the capital expenditure will give rise to a borrowing need.

- 6.2. The actual capital expenditure forms one of the required prudential indicators. The tables below show the actual capital expenditure for 2022/23 against that budgeted and how this was financed.

Table 1: Capital Expenditure

<b>Capital Expenditure</b>	<b>2021/22 Actual £'000</b>	<b>2022/23 Revised Budget £'000</b>	<b>2022/23 Actual £'000</b>	<b>2022/23 Variance £'000</b>
Resources Directorate	5,598	12,129	3,641	(8,488)
People's Directorate	2,258	28,915	3,265	(25,650)
Place Directorate	36,261	62,263	18,482	(43,781)
<b>Total General Fund</b>	<b>44,117</b>	<b>103,307</b>	<b>25,388</b>	<b>(77,919)</b>
Housing Revenue Account (HRA)	30,529	52,855	14,988	(37,867)
<b>Total Capital Expenditure</b>	<b>74,646</b>	<b>156,162</b>	<b>40,376</b>	<b>(115,786)</b>

Table 2: Financing of Capital Expenditure

<b>Finance of Capital Expenditure</b>	<b>2021/22 Actual £'000</b>	<b>2022/23 Actual £'000</b>
<b>General Fund (GF)</b>		
Capital receipts	376	3,541
Capital Grants	5,449	6,593
BCiL	1,756	3,477
NCiL	161	209
Section106	398	613
Revenue		-
<b>Total External Funding</b>	<b>8,140</b>	<b>14,433</b>
<b>Borrowing Requirement (GF)</b>	<b>35,977</b>	<b>10,955</b>
<b>Total GF Funding</b>	<b>44,117</b>	<b>25,388</b>
<b>Housing Revenue Account (HRA)</b>		
Capital receipts	7,185	1,761
Capital Grants	16,156	1,400
Section106	100	419
Revenue	6,403	7,621
<b>Total External Funding</b>	<b>29,844</b>	<b>11,201</b>
<b>Borrowing Requirement (HRA)</b>	<b>685</b>	<b>3,787</b>
<b>Total HRA Funding</b>	<b>30,529</b>	<b>14,988</b>
<b>Total General Fund &amp; HRA Funding</b>	<b>74,646</b>	<b>40,376</b>
<b>Total External Funding</b>	<b>37,984</b>	<b>25,634</b>
<b>Total Borrowing Requirement</b>	<b>36,662</b>	<b>14,742</b>

6.3. Further details of the capital expenditure position are included within the Revenue and Capital Outturn Report 2022/23 being reported at this meeting of 27th July 2023.

## 7.0 The Councils Overall Borrowing Need

7.1. The Council's underlying need to borrow to finance capital expenditure is termed the Capital Financing Requirement (CFR). The CFR increases within any net financing need for the year and reduces through the application of resources, including an annual charge to the revenue budget, the Minimum Revenue Provision (MRP).

### Gross Debt and the CFR

7.2. In order to ensure that borrowing levels are prudent over the medium term and only for a capital purpose, the Council ensure that its gross external debt (borrowing plus other long term liabilities such as PFI and Finance Leases) does not, except in the short term, exceed the total CFR in the preceding year (2022/23) plus the estimates of any additional borrowing requirement for the current (2023/24) and the next two financial years. The table below highlights the Council's gross debt position for 2022/23 of £432.2m against the CFR in 2022/23 of £579.7m which shows that the Council has complied with this Prudential Indicator and stayed within its CFR.

Table 3: Gross Debt and CFR

<b>Capital Financing Requirements (CFR)</b>	<b>2021/22 Actual £'000</b>	<b>2022/23 Draft Actual £'000</b>
General Fund	430,661	418,900
HRA	157,439	160,808
<b>Total CFR</b>	<b>588,100</b>	<b>579,708</b>
<b>Gross Debt</b>	<b>438,519</b>	<b>432,216</b>
<b>Under/(Over) Borrowing</b>	<b>149,581</b>	<b>147,492</b>

### Financing Costs to Net Revenue Stream

7.3. This Prudential Indicator identifies the trend in the cost of capital (borrowing and other long term obligation costs net of investment income), against the net revenue stream. The actual financing costs as a proportion of net revenue stream for 2022/23 compared to 2021/22 is included within table 4 below.

Table 4: Financing costs as a proportion of net revenue stream

<b>Ratio of financing costs to net revenue stream %</b>	<b>2021/22 Actual</b>	<b>2022/23 Draft Actual</b>
General Fund	16%	16%
HRA	20%	20%
<b>Total CFR</b>	<b>16%</b>	<b>16%</b>



### The Authorised Limit

- 7.4. The Authorised Limit is the “Affordable Borrowing Limit” required by S3 of the Local Government Act 2003. Once this has been set, the Council does not have the power to borrow above this level.
- 7.5. The Authorised Limit for 2022/23 was originally set as part of the 2022/23 TMSS at a total of £695m for borrowing and other long term liabilities. In light of the revised capital programme, as part of the 2023/24 TMSS which went to Cabinet in February 2023, the 2022/23 Authorised Limit was revised to £685m consisting of £660m (borrowing) and £25m (other long term liabilities).
- 7.6. With a gross borrowing figure of £432.2m, the table below demonstrates that during 2022/23 the Council has maintained gross borrowing within its Authorised Limit.

Table 5: Authorised Limit

<b>Authorised Limit £'000 Set as part of:</b>	<b>2022/23 2022/23 TMSS</b>	<b>2022/23 2023/24 TMSS</b>
Borrowing	668,857	659,884
Other Long Term Liabilities	26,303	24,955
<b>Total</b>	<b>695,160</b>	<b>684,839</b>

### The Operational Boundary

- 7.7. The Operational Boundary is the expected borrowing position of the Council during the year. Periods where the actual position is either below or over the boundary are acceptable subject to the Authorised Limit not being breached.
- 7.8. The Operational Boundary for 2022/23 was originally set as part of the 2022/23 TMSS at a total of £655m. This was revised to reflect the revised capital programme as part of the 2023/24 TMSS to £645m, consisting of £630m (borrowing) and £15m (other long term liabilities).
- 7.9. With a gross borrowing figure of £432.2m, the table below demonstrates that during 2022/23 the Council has maintained gross borrowing within its Operational Boundary Limit.

Table 6: Operational Boundary

<b>Operational Boundary £'000 Set as part of:</b>	<b>2022/23 2022/23 TMSS</b>	<b>2022/23 2023/24 TMSS</b>
Borrowing	638,857	629,884
Other Long Term Liabilities	16,303	14,955
<b>Total</b>	<b>655,160</b>	<b>644,839</b>

## 8.0 Treasury Position as at 31 March 2023

Borrowing Outturn (excluding borrowing by PFI and finance leases)

- 8.1. The Council has maintained an internal borrowing strategy for a number of years, forgoing lost investment income on investments to use its cash balances to temporarily fund capital expenditure and avoid external borrowing costs. This has proved efficient given the differential between short term investment returns and borrowing costs. Table 3 shows that internal (or under) borrowing as at 31<sup>st</sup> March 2023 was £147m (£149m as at 31<sup>st</sup> March 2022).
- 8.2. No additional external borrowing was undertaken during 2022/23, and the Council's underlying need to borrow, measured by the increase in the Capital Financing Requirement, showed a small reduction of £8m over the period.
- 8.3. The borrowing portfolio of some £422m reduced slightly in 2022/23 to £417m, comprising £343m of PWLB loans and £74m of Market loans, and at the 31<sup>st</sup> March 2023 the portfolio was running at an average interest rate of 3.45% and an average life of 35 years.

Table 7: Borrowing Portfolio

Borrowing Portfolio £'000	31-Mar-22			31-Mar-23		
	Principal	Average Rate (%)	Average Life (yrs)	Principal	Average Rate (%)	Average Life (yrs)
PWLB	348,461	3.45	35.06	343,461	3.43	34.41
Market	73,800	3.53	40.72	73,800	3.53	39.56
<b>Total</b>	<b>422,261</b>	<b>3.46</b>	<b>36.05</b>	<b>417,261</b>	<b>3.45</b>	<b>35.32</b>

- 8.4. The maturity structure of the debt portfolio remained within the Prudential Indicator limits set as part of the 2022/23 Treasury Management Strategy. The maturity structure table below includes one Lenders Option Borrowers Option (LOBO) market loan at its next call date, which is the earliest date the lender can require repayment. Table 8 reflects this position in respect of the maturity profile of the debt portfolio.

Table 8: Maturity Structure of Borrowing

Maturity structure of borrowing	Lower	Upper	Actual 31.03.22	Actual 31.03.23
Under 12 months	0%	40%	6%	6%
12 months to 2 years	0%	30%	0%	0%
2 years to 5 years	0%	30%	0%	0%
5 years to 10 years	0%	40%	5%	5%
10 years and above	30%	100%	89%	89%

- 8.5. Appendix 2 provides a summary of PWLB maturity loan certainty rates across 2022/23 over various durations from 1-50 years.

#### Investment Outturn

- 8.6. The Council made investments throughout 2022/23 in accordance with the Treasury Management Strategy approved by Full Council in February 2022.

- 8.7. Due to the internal borrowing strategy being undertaken by the Council, cash balances continued to be held on a short term basis for liquidity purposes, in Money Market Funds and banks throughout 2022/23.
- 8.8. Investment returns which had been low during 2021/22 saw significant improvement in 2022/23 with the Council investment portfolio earning of an average return of 0.81% as set out in Table 9.
- 8.9. Bank Rate increased steadily throughout 2022/23, starting at 0.75% and finishing at 4.25%. Bank Rate has continued to increase after 31 March 2023, and now stands at 5.0%. This will increase investment returns in 2023/24.
- 8.10. The investment portfolio remained highly liquid throughout 2022/23. Investments decreased from £98m to £79m over the year while the average rate of interest saw a considerable increase from 0.02% as at 31st March 2022 to 0.81% as at 31st March 2023.

Table 9: Investment Portfolio

Investment Portfolio	31-Mar-22			31-Mar-23		
	Principal £'000	Average Rate (%)	Average Life (days)	Principal £'000	Average Rate (%)	Average Life (days)
MMF	1,617	0.05	1	1,651	0.20	1
Banks	96,386	0.02	3	48,743	0.67	3
UK Government	0	0	0	29,000	1.20	7
<b>Total</b>	<b>98,003</b>	<b>0.02</b>	<b>3</b>	<b>79,394</b>	<b>0.810</b>	<b>5</b>

## 9.0. Treasury Management Strategy for 2022/23

### Investment strategy for 2022/23

- 9.1. Investment returns picked up throughout the course of 2022/23 as central banks, including the Bank of England, realised that inflationary pressures were not transitory, and that tighter monetary policy was called for.
- 9.2. The sea-change in investment rates meant we were faced with the challenge of pro-active investment of surplus cash for the first time in over a decade, and this emphasised the need for a detailed working knowledge of cashflow projections so that the appropriate balance between maintaining cash for liquidity purposes, and “laddering” deposits on a rolling basis to lock in the increase in investment rates as duration was extended, became an on-going feature of the investment landscape.
- 9.3. The expectation for interest rates within the treasury management strategy for 2022/23 (table 10) was that Bank Rate would rise to 1.25%.

Table 10: Link Asset Services Interest Rate Forecast 2021-2025 (TMSS 2022/23)

Link Group Interest Rate View 20.12.21														
	Dec-21	Mar-22	Jun-22	Sep-22	Dec-22	Mar-23	Jun-23	Sep-23	Dec-23	Mar-24	Jun-24	Sep-24	Dec-24	Mar-25
BANK RATE	0.25	0.25	0.50	0.50	0.50	0.75	0.75	0.75	0.75	1.00	1.00	1.00	1.00	1.25
3 month ave earnings	0.20	0.30	0.50	0.50	0.60	0.70	0.80	0.90	0.90	1.00	1.00	1.00	1.00	1.00
6 month ave earnings	0.40	0.50	0.60	0.60	0.70	0.80	0.90	1.00	1.00	1.10	1.10	1.10	1.10	1.10
12 month ave earnings	0.70	0.70	0.70	0.70	0.80	0.90	1.00	1.10	1.10	1.20	1.20	1.20	1.20	1.20
5 yr PWLB	1.40	1.50	1.50	1.60	1.60	1.70	1.80	1.80	1.80	1.90	1.90	1.90	2.00	2.00
10 yr PWLB	1.60	1.70	1.80	1.80	1.90	1.90	2.00	2.00	2.00	2.10	2.10	2.10	2.20	2.30
25 yr PWLB	1.80	1.90	2.00	2.10	2.10	2.20	2.20	2.20	2.30	2.30	2.40	2.40	2.50	2.50
50 yr PWLB	1.50	1.70	1.80	1.90	1.90	2.00	2.00	2.00	2.10	2.10	2.20	2.20	2.30	2.30

- 9.4. The Government also supplied funding to local authorities to pass on to businesses. This meant that for most of the year there was much more liquidity in financial markets than there was demand to borrow, with the consequent effect that investment earnings rates plummeted.
- 9.5. The Authority's continuing internal borrowing strategy means that investments are kept liquid, with balances expected to be minimised through the use of reserves and balances to support internal borrowing, rather than borrowing externally from the financial markets. External borrowing would have incurred an additional revenue cost, due to the differential between borrowing and investment rates.

Borrowing strategy for 2022/23

- 9.6. As the interest forecast in table 10 above illustrates, there was expected to be an upward movement in PWLB rates over the period from March 2022 to March 2025 based on the expectation that it would take economies, including the UK, a prolonged period to recover all the momentum they have lost in the sharp recession caused during the coronavirus shut down period
- 9.7. During 2022/23 the Council maintained an internal borrowing position and no new external borrowing was taken during the year. The CFR reduced slightly by £8m during 2022/23, which resulted in the internal borrowing position of the Council reducing from £149m to £147m.
- 9.8. This means that the capital borrowing need, (the Capital Financing Requirement), was not fully funded with loan debt, as cash supporting the Council's reserves, balances and cash flow has continued to be used as an interim measure.
- 9.9. The policy of avoiding new borrowing by running down spare cash balances, has served well over the last few years. However, this has been kept under review to avoid incurring higher borrowing costs in the future when the Authority may

not be able to avoid new borrowing to finance capital expenditure and/or the refinancing of maturing debt.

9.10. Link Group's economic review of 2022/23 and their associated interest rate forecasts at the start and close of the year are contained in Appendix 1.

### **10.0. Legal Implications**

10.1 The Local Government Act 2003 requires the Council to 'have regard to' the Prudential Code and to set Prudential Indicators for the next three years to ensure that the Council's capital investment plans are affordable, prudent and sustainable. These are contained within this report. The Act requires the Council to set out its treasury strategy for borrowing and to prepare an Annual Investment Strategy. This sets out the Council's policies for managing its investments and for giving priority to the security and liquidity of those investments. This report assists the Council in fulfilling its statutory obligation under the Local Government Act 2003 to monitor its borrowing and investment activities.

### **11.0. Financial Implications**

11.1 In addition to supporting the Council's revenue and capital programmes the Treasury Management interest budget is an important part of the revenue budget. Any savings achieved, or overspends incurred, have a direct impact on the financial performance of the budget.

### **12.0. Procurement Implications**

12.1 There are no procurement implication arising from this report

### **13.0. Risk Management Implications**

13.1 This report is for noting and Committee are not being asked to make any decisions hence there are no direct risk management implications to this report.

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

14.1 There are no direct equalities impact. Compliance with s.149 of the Equality Act is integral to all aspects decision-making.

### **15.0. Council Priorities**

15.1 This report deals with the Treasury Management Strategy which plays a significant part in supporting the delivery of all the Council's corporate priorities.

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

**Statutory Officer: Dawn Calvert**

Signed by the Chief Financial Officer

**Date: 03/07/2023**

**Statutory Officer: Caroline Eccles**

Signed on behalf of the Monitoring Officer

**Date: 03/07/2023**

**Chief Officer: Dawn Calvert**

Signed on behalf of the Corporate Director

**Head of Procurement: Nimesh Mehta**

Signed by the Head of Procurement

**Date: 04/07/2023**

**Head of Internal Audit: Neale Burns**

Signed on behalf of the Int. Interim the Head of Internal Audit

**Date: 16/07/23**

### **Mandatory Checks**

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

Has the Portfolio Holder(s) been consulted? Yes

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

**Contact:** Bola Tobun - Treasury & Pensions Manager,  
Telephone 020 8424 9264, [Bola.Tobun@harrow.gov.uk](mailto:Bola.Tobun@harrow.gov.uk)

**Background Papers:** None

## Appendix 1: Link Group Economic Commentary

**UK. Economy** - Against a backdrop of stubborn inflationary pressures, the easing of Covid restrictions in most developed economies, the Russian invasion of Ukraine, and a range of different UK Government policies, it is no surprise that UK interest rates have been volatile right across the curve, from Bank Rate through to 50-year gilt yields, for all of 2022/23.

Market commentators' misplaced optimism around inflation has been the root cause of the rout in the bond markets with, for example, UK, EZ and US 10-year yields all rising by over 200bps in 2022. The table below provides a snapshot of the conundrum facing central banks: inflation is elevated but labour markets are extra-ordinarily tight, making it an issue of fine judgment as to how far monetary policy needs to tighten.

	<b>UK</b>	<b>Eurozone</b>	<b>US</b>
<b>Bank Rate</b>	4.25%	3%	4.75%-5%
<b>GDP</b>	0.1%q/q Q4 (4.1%y/y)	+0.1%q/q Q4 (1.9%y/y)	2.6% Q4 Annualised
<b>Inflation</b>	10.4%y/y (Feb)	6.9%y/y (Mar)	6.0%y/y (Feb)
<b>Unemployment Rate</b>	3.7% (Jan)	6.6% (Feb)	3.6% (Feb)

Q2 of 2022 saw UK GDP deliver growth of +0.1% q/q, but this was quickly reversed in the third quarter, albeit some of the fall in GDP can be placed at the foot of the extra Bank Holiday in the wake of the Queen's passing. Q4 GDP was positive at 0.1% q/q. Most recently, January saw a 0.3% m/m increase in GDP as the number of strikes reduced compared to December. In addition, the resilience in activity at the end of 2022 was, in part, due to a 1.3% q/q rise in real household disposable incomes. A big part of that reflected the £5.7bn payments received by households from the government under the Energy Bills Support Scheme.

Nevertheless, CPI inflation picked up to what should be a peak reading of 11.1% in October, although hopes for significant falls from this level will very much rest on the movements in the gas and electricity markets, as well as the supply-side factors impacting food prices. On balance, most commentators expect the CPI measure of inflation to drop back towards 4% by the end of 2023. As of February 2023, CPI was 10.4%.

The UK unemployment rate fell through 2022 to a 48-year low of 3.6%, and this despite a net migration increase of c500k. The fact remains, however, that with many economic participants registered as long-term sick, the UK labour force shrunk by c500k in the year to June. Without an increase in the labour force participation rate, it is hard to see how the UK economy will be able to grow its way to prosperity, and with average wage increases running at over 6% the MPC will be concerned that wage inflation will prove just as sticky as major supply-side shocks to food (up 18.3% y/y in

February 2023) and energy that have endured since Russia's invasion of Ukraine on 22 February 2022.

Bank Rate increased steadily throughout 2022/23, starting at 0.75% and finishing at 4.25%.

In the interim, following a Conservative Party leadership contest, Liz Truss became Prime Minister for a tumultuous seven weeks that ran through September and October. Put simply, the markets did not like the unfunded tax-cutting and heavy spending policies put forward by her Chancellor, Kwasi Kwarteng, and their reign lasted barely seven weeks before being replaced by Prime Minister Rishi Sunak and Chancellor Jeremy Hunt. Their Autumn Statement of the 17<sup>th</sup> of November gave rise to a net £55bn fiscal tightening, although much of the "heavy lifting" has been left for the next Parliament to deliver. However, the markets liked what they heard, and UK gilt yields have reversed the increases seen under the previous tenants of No10/11 Downing Street, although they remain elevated in line with developed economies generally.

As noted above, GDP has been tepid throughout 2022/23, although the most recent composite Purchasing Manager Indices for the UK, US, EZ and China have all surprised to the upside, registering survey scores just above 50 (below suggests economies are contracting, and above suggests expansion). Whether that means a shallow recession, or worse, will be avoided is still unclear. Ultimately, the MPC will want to see material evidence of a reduction in inflationary pressures and a loosening in labour markets. Realistically, that is an unlikely outcome without unemployment rising and wage settlements falling from their current levels. At present, the bigger rise in employment kept the ILO unemployment rate unchanged at 3.7% in January. Also, while the number of job vacancies fell for the ninth consecutive month in February, they remained around 40% above pre-pandemic levels.

Our economic analysts, Capital Economics, expect real GDP to contract by around 0.2% q/q in Q1 and forecast a recession this year involving a 1.0% peak-to-trough fall in real GDP.

The £ has remained resilient of late, recovering from a record low of \$1.035, on the Monday following the Truss government's "fiscal event", to \$1.23. Notwithstanding the £'s better run of late, 2023 is likely to see a housing correction of some magnitude as fixed-rate mortgages have moved above 4.5% and affordability has been squeezed despite proposed Stamp Duty cuts remaining in place.

As for equity markets, the FTSE 100 started 2023 strongly, rising to a record high of 8,014 on 20<sup>th</sup> February, as resilient data and falling inflation boosted earnings. But global equities fell sharply after concerns over the health of the global banking system emerged early in March. The fall in the FTSE 100 was bigger than the drop in the US S&P 500. Indeed, at around 7,600 now, the FTSE is 5.2% below its record high on 20<sup>th</sup> February, while the S&P 500 is only 1.9% lower over the same period. That's despite UK banks having been less exposed and equity prices in the UK's financial sector not falling as far. It may be due to the smaller decline in UK interest rate expectations and bond yields, which raise the discounted value of future earnings, compared to the US.

**USA.** The flurry of comments from Fed officials over recent months suggest there is still an underlying hawkish theme to their outlook for interest rates. Markets are pricing



in a further interest rate increases of 25-50bps, on top of the current interest rate range of 4.75% - 5%.

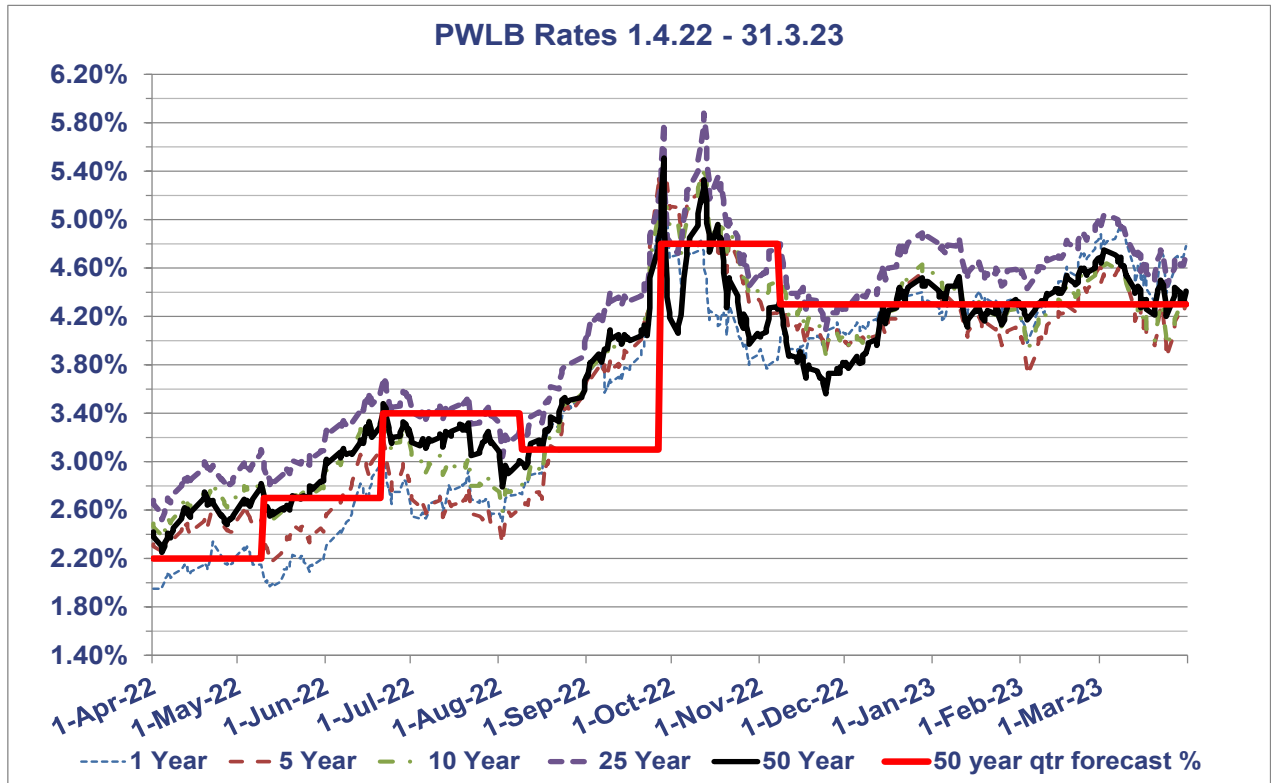
In addition, the Fed is expected to continue to run down its balance sheet once the on-going concerns about some elements of niche banking provision are in the rear-view mirror.

As for inflation, it is currently at c6% but with the economy expected to weaken during 2023, and wage data already falling back, there is the prospect that should the economy slide into a recession of any kind there will be scope for rates to be cut at the backend of 2023 or shortly after.

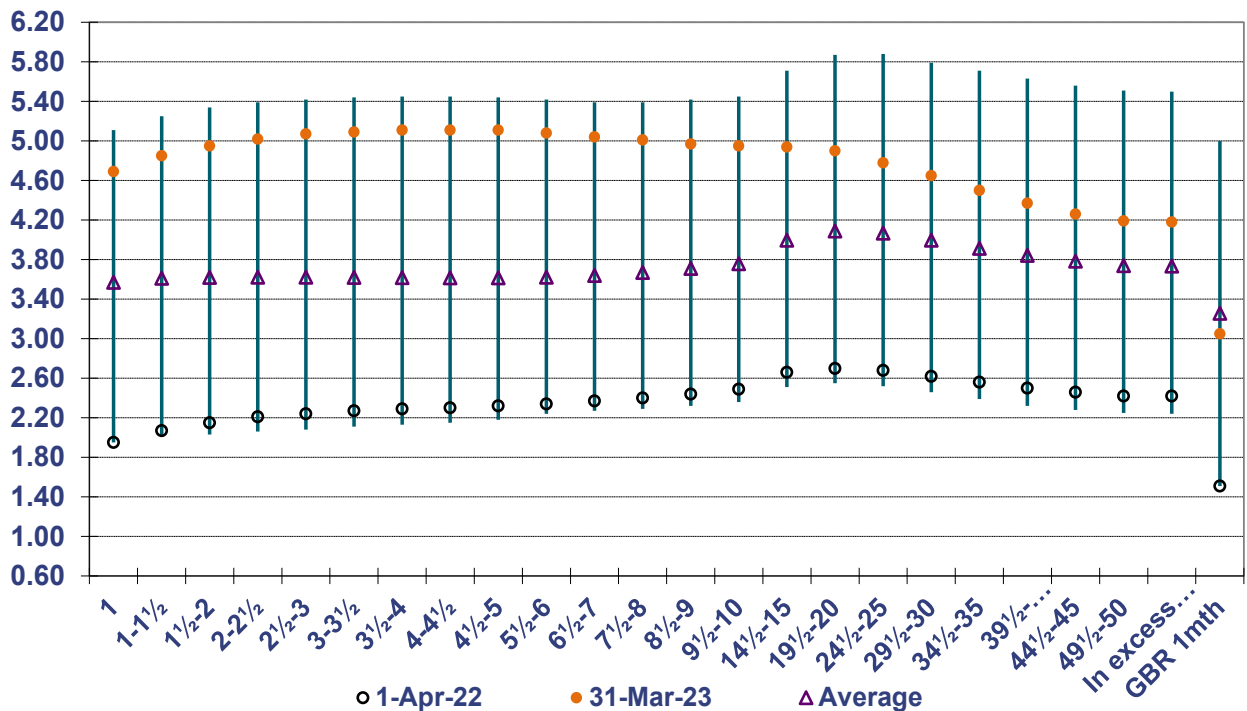
**EU.** Although the Euro-zone inflation rate has fallen below 7%, the ECB will still be mindful that it has further work to do to dampen inflation expectations and it seems destined to raise rates to 4% in order to do so. Like the UK, growth has remained more robust than anticipated but a recession in 2023 is still seen as likely by most commentators.

# Appendix 2: Borrowing Rate Summary 2022/23

PWLB RATES 2022/23



**PWLB Certainty Rate Variations 1.4.22 to 31.3.23**



## HIGH/LOW/AVERAGE PWLB RATES FOR 2022/23

	1 Year	5 Year	10 Year	25 Year	50 Year
<b>Low</b>	1.95%	2.18%	2.36%	2.52%	2.25%
<b>Date</b>	01/04/2022	13/05/2022	04/04/2022	04/04/2022	04/04/2022
<b>High</b>	5.11%	5.44%	5.45%	5.88%	5.51%
<b>Date</b>	28/09/2022	28/09/2022	12/10/2022	12/10/2022	28/09/2022
<b>Average</b>	3.57%	3.62%	3.76%	4.07%	3.74%
<b>Spread</b>	3.16%	3.26%	3.09%	3.36%	3.26%

	1 Year	5 Year	10 Year	25 Year	50 Year
<b>01/04/2021</b>	0.80%	1.20%	1.73%	2.22%	2.03%
<b>31/03/2022</b>	1.91%	2.25%	2.43%	2.64%	2.39%
<b>Low</b>	0.78%	1.05%	1.39%	1.67%	1.25%
<b>Low date</b>	08/04/2021	08/07/2021	05/08/2021	08/12/2021	09/12/2021
<b>High</b>	2.03%	2.37%	2.52%	2.75%	2.49%
<b>High date</b>	15/02/2022	28/03/2022	28/03/2022	23/03/2022	28/03/2022
<b>Average</b>	1.13%	1.45%	1.78%	2.10%	1.85%
<b>Spread</b>	1.25%	1.32%	1.13%	1.08%	1.24%

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**Cabinet – 27 July 2023**

**Reference from Governance, Audit, Risk Management and Standards (GARMS) Committee 5<sup>th</sup> July 2023**

**76. Treasury Management Annual Outturn Report 2022/2023**

**RESOLVED:** That

- (1) the Committee notes the Treasury Management outturn position for 2022/23;
- (2) the Committee refers the Treasury Management Annual Outturn Report 2022/23 to Cabinet for noting.

**Reason for Decision:**

- (3) To promote effective financial management and comply with regulations issued under the Local Government Act 2003, the CIPFA Code of Practice on Treasury Management, and the CIPFA Prudential Code for Capital Finance, along with meeting the requirements of the Council's Financial Regulations.
- (4) To keep Members informed of Treasury Management activities and performance for 2022/23.

**For information**

**Background Documents:**

[Agenda for Governance, Audit, Risk Management and Standards Committee on Wednesday 5 July 2023, 6.30 pm – London Borough of Harrow](#)

**Contact Officer:**

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