

Report for: Cabinet

Date of Meeting:	16 February 2023
Subject:	Approval to consult on Draft Tall Buildings ('Building Heights') Supplementary Planning Document (SPD)
Key Decision:	Yes – affects the entire borough
Responsible Officer:	Dipti Patel - Corporate Director, Place; Viv Evans - Chief Planning Officer
Portfolio Holder:	Cllr Marilyn Ashton - Deputy Leader of the Council, Portfolio Holder for Planning & Regeneration
Exempt:	No
Decision subject to Call-in:	Yes
Wards affected:	All
Enclosures:	Appendix 1 – Draft Tall Buildings ('Building Heights') Supplementary Planning Document Appendix 2 – Reference from the Planning Policy Advisory Panel meetings (3 rd October 2022)

Section 1 – Summary and Recommendations

This report introduces a draft Tall Buildings ('Building Heights') Supplementary Planning Document (SPD). The purpose of the Tall Buildings ('Building Heights') SPD (if adopted) is to provide guidance for developments to determine if they would constitute a contextually tall building within the suburban location in which they would be located. The SPD will provide contemporary design guidance for such buildings, and those that are defined as tall as set out in Policy D9 (Tall buildings) of the London Plan (2021). The draft SPD sets out guidance to determine when a development would be considered (defined as) contextually tall within its suburban location, by providing guidance on how the prevailing pattern of existing development (including heights) should be analysed and determined, and then provides formulae that will determine if a building would be contextually tall within that location. The SPD then provides contemporary design guidance for all buildings that are considered (having applied the height formulae) contextually tall, as well as those defined as a tall building as per the London Plan (2021), to assist in ensuring high quality design is achieved.

Once adopted the Tall Buildings ('Building Heights') Supplementary Planning Document, will be a material planning consideration for any planning applications that meet the definition of a contextually tall building, or the London Plan (2021) definition of a tall building.

This report seeks Cabinet's agreement to consult on the draft SPD. The SPD will be amended in response to the consultation (where appropriate) and presented to the Planning Policy Advisory Panel for comment and Cabinet for final adoption.

Recommendations:

Cabinet is requested to:

1. Approve the draft Tall Buildings ('Building Heights') SPD, attached as Appendix 1, for public consultation.
2. Authorise the Chief Planning Officer, following consultation with the Deputy Leader of the Council, who is also the Portfolio Holder for Planning & Regeneration, to consider and agree any minor amendments to the draft SPD prior to consultation, and consultation arrangements.

Reason: (for recommendations)

Preparation and adoption of a Tall Buildings ('Building Heights') SPD provides specific guidance to determine what is a contextually tall building within suburban Harrow, and also provides design guidance to ensure high quality developments that are delivered in appropriate locations. The Tall Buildings ('Building Heights') SPD will provide further guidance to the current Harrow Local Plan and ensure new development would not harm suburban Harrow.

Section 2 – Report

1.0 Introductory paragraph

- 1.1 The Council has previously committed to prepare a Tall Buildings Supplementary Planning Document (SPD)¹, which will directly respond to meeting a stated priority of the Council in regard to tall buildings in suburbia.
- 1.2 Supplementary Planning Documents (SPDs) build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. The Tall Buildings ('Building Heights') SPD will provide further guidance principally to Policy DM1 (Achieving a high Standard of Delivery) of the Harrow Development Management Policies Local Plan (2013). It will also supplement any forthcoming tall building policy that will be brought forward through the local plan review.

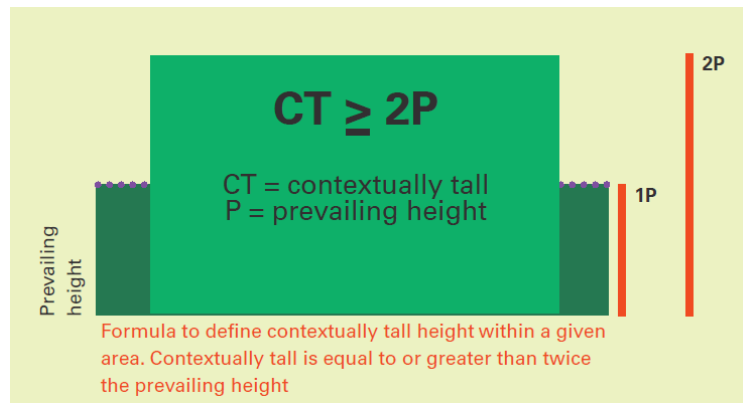
2.0 Options Considered

- 2.1 To progress a Tall Buildings ('Building Heights') Supplementary Planning Document (SPD) is a stated priority of the Council. A Tall Buildings ('Building Heights') SPD would provide for guidance for developments within the suburban context of Harrow, where there is currently little guidance to assist applicants, planning officers and elected members. Such a SPD would also assist in the application of Policy D9 (Tall buildings) of the London Plan (2021), which was introduced more recently than the Harrow Local Plan in 2012 and 2013, which does not have a policy that relates to tall buildings / building heights outside the Harrow and Wealdstone Opportunity Area. This report seeks authority to consult on the draft Tall Buildings ('Building Heights') SPD, so that it can be adopted as a SPD, meaning it can form a material consideration in determining planning applications. This is the preferred option and forms the basis of the report / recommendations.
- 2.2 An alternative option would be not to progress with the Tall Buildings ('Building Heights') SPD (i.e. 'do nothing'). This do-nothing option would not result in design guidance that would support existing local plan policies and assist in the assessment of planning applications relating to contextually tall or tall buildings (particularly outside the Opportunity Area). This option would mean relying solely on the current local plan policies, which do not provide contemporary clear design guidance for tall or contextually tall building development within suburban Harrow. This option would also mean relying on any subsequent new local plan to address tall building development in suburban Harrow through a tall building policy (as required by the London Plan 2021). However, a new Local Plan is not anticipated until December 2025 (as per the Local Development Scheme agenda item at this meeting) and would leave a void of specific guidance over this period. Accordingly, to do nothing is considered to not be an appropriate option, nor does it reflect a stated priority of the administration.

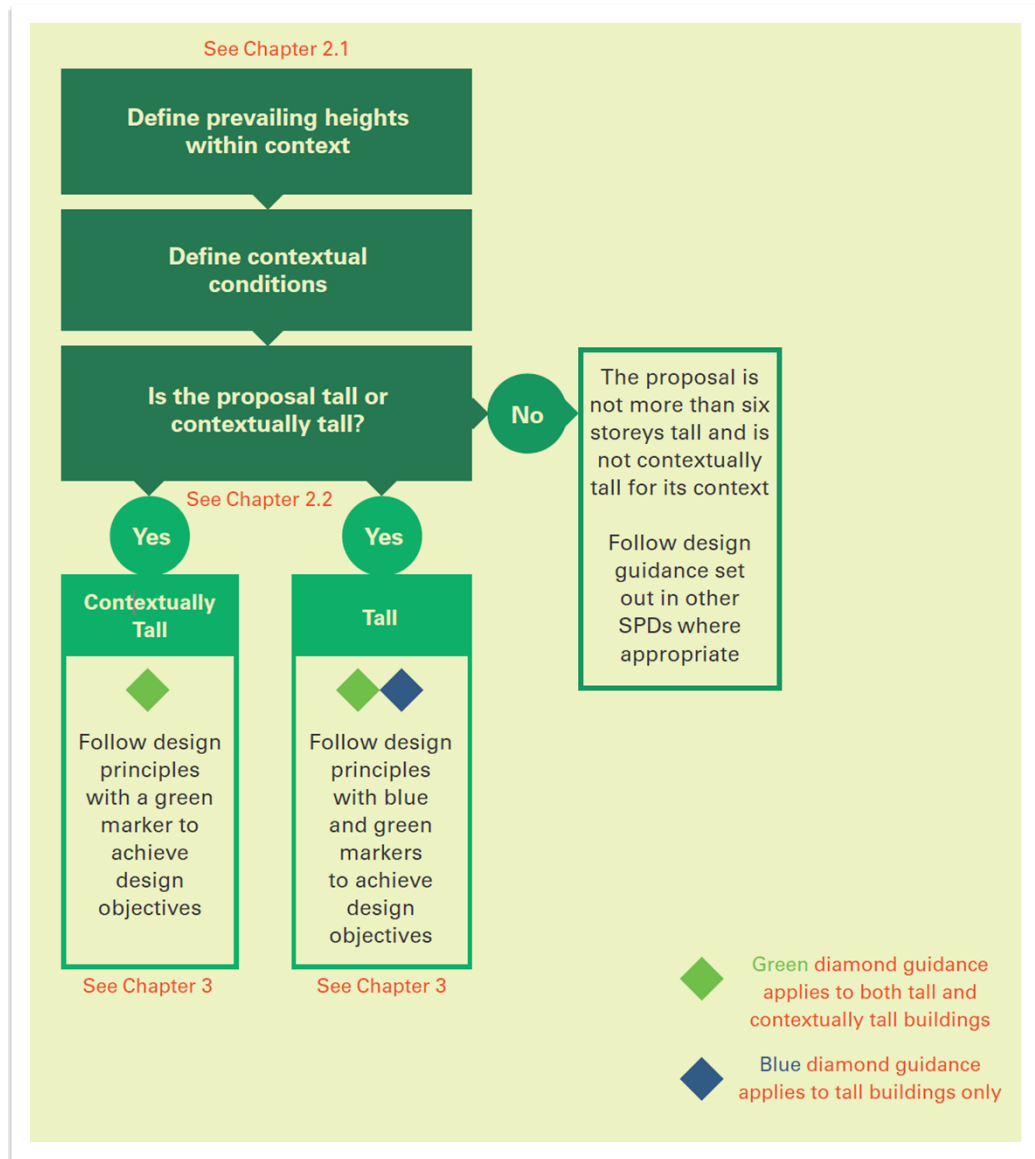
- 2.3 A further alternative option would be to adopt the Tall Buildings ('Building Heights') SPD without formal consultation. Such an option would be contrary to Council commitments in relation to engagement and consultation and would also lessen the weight that can be given to the SPD when assessing planning applications as without consultation, it cannot be legally adopted as a SPD. This option is not the preferred way forward.

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

- 3.1 The Tall Buildings ('Building Heights') SPD has been progressed based on the relevant evidence base, and the themes / objectives / principles noted and agreed at the 3rd October 2022 Planning Policy Advisory Panel (PPAP) meeting. Building on this, officers have informally consulted with relevant external and internal stakeholders to assist in ensuring that as drafted the guidance text and images within the SPD address the technical / operational requirements of those stakeholders. The draft Tall Buildings ('Building Heights') SPD was presented to the Planning Policy Advisory Panel on the 9th January 2023. Minutes for both PPAP meetings are attached as Appendix 2 of this report.
- 3.2 The draft Tall Buildings ('Building Heights') SPD is set out in the following structure and covering the points identified in paragraphs 2.3 – 2.14 below. The full contents is set out on Page 3 of the SPD.
- a. Introduction
 - b. Understanding Harrow's existing character
 - c. Deigning Tall and Contextually Tall Buildings
 - d. Design principles and objectives
 - e. Application process and requirements.
- 3.3 The draft SPD proposes to provide guidance to demonstrate how height should be considered across suburban Harrow and in different character areas that make up suburban area (i.e. the area outside the Harrow and Wealdstone Opportunity Area. The SPD sets out how a context analysis will need to be undertaken to support applications, to demonstrate what the prevailing context is in any specific location, specifically in relation to height. The SPD provides images to demonstrate how this context analysis would be undertaken and provides guidance on the spatial element to this (i.e., how far from the application site should form part of the analysis).
- 3.4 Once an established context has been determined for an application site, applicants are then able to utilise the formulae below to determine if the proposed development would be contextually tall within any specific location.



- 3.5 Buildings that exceed the tall building threshold as set out in Policy D9 (Tall buildings) of the London Plan (2021) (6 storeys / 18m) will not need to apply the formulae (as they will by default be defined as 'tall buildings' as per the London Plan).
- 3.6 Proposals determined to be tall (London Plan definition) and/or contextually tall (as determined through the context analysis and application of the formulae), will need to then follow the guidance within the Tall Buildings ('Building Heights') SPD. Buildings that exceed the London Plan definition must also be considered against Policy D9 (Tall buildings) of the London Plan (2021).
- 3.7 It is acknowledged that tall buildings as defined by Policy D9 (Tall buildings), which exceed 6 storeys / 18m in height, have more potential to cause a greater number and greater degree of harm. For this reason, a greater level of design scrutiny should be applied to taller buildings, and conversely those that are not as tall, would not be subject to the same level of scrutiny / guidance. However, this does not mean that a high standard of design should not be achieved by all developments.
- 3.8 It is proposed to reflect this approach by introducing a traffic light system, that will provide specific guidance for either or both tall buildings (as per London Plan 2021), or contextually tall buildings (as defined by the SPD). The traffic light system will direct applicants which of the design guidance is relevant to their specific scheme, which will be determined by its height. This process is set out in the diagram below (extracted from the draft SPD).



3.9 Once it is determined which guidance a scheme is required to be considered against, applicants will be expected to demonstrate in information accompanying any planning application an assessment of their scheme against the relevant objectives, principles and associated guidance. The guidance is contained with Chapter 3 of the draft Tall Buildings ('Building Heights') SPD, which is attached as Appendix 1.

3.10 Chapter 3 follows the following three overarching themes:

- (a) Addressing Place
- (b) Delivering Quality
- (c) Creating Good Growth

3.11 The Addressing Place theme has the objectives (a) responding the character of suburban Metroland, (b) protect built and landscape heritage, and (c) locate height appropriately; these link building heights to location and context. Of particularly note in the context in which the document has been prepared is the guidance that 'Given the strong

character across suburban Metroland, specifically in relation to heights being between 2-3 storeys, proposals that meet the London Plan (2021) tall building definition (6 storeys or 18 metres measured from ground to the floor level of the uppermost storey), would not be supported' (see Design Principle A2).

- 3.12 The themes of Delivering Quality and Creating Good Growth provide guidance in relation to design and outcomes ('good growth').

Conclusion

- 3.13 The draft SPD does not (cannot) introduce new policy as SPDs do not form part of the development plan, rather it can provide guidance to adopted policy(ies). Specifically, the proposed Tall Buildings ('Building Heights') SPD will build upon and provide more detailed advice or guidance to policies within the existing Harrow Local Plan (Harrow Development Management Policies Local Plan: DM1 (Achieving a High Standard of Development), and also any new policies in any replacement Local Plan. An adopted SPD will be a material consideration in decision making.
- 3.14 The draft Tall Buildings ('Building Heights') SPD seeks to provide a context-based approach to considering 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 suburban pattern of development.

4.0 Consultation on the draft Tall Buildings ('Buildings Heights') SPD

- 4.1 Throughout the drafting of the SPD, officers have engaged informally with key external and internal stakeholders, to ensure that any key points would be able to be addressed at an early stage. The consultation undertaken to date has been informal, with formal, wider consultation undertaken once the drafting of the SPD has progressed to a point where it has been considered by Cabinet and agreed for formal consultation.

External Consultation

Greater London Authority (London Plan Team)

- 4.2 The Greater London Authority (GLA) constitute a statutory consultee for new planning documents being produced by Local Planning Authorities. Harrow officers engaged informally with GLA officers on the 10th October 2022 to set out the proposed approach to progressing the SPD, as advised at the Planning Policy Advisory Panel on 3rd October 2022. GLA officers were able to provide informal, officer level feedback in relation to, among other things, the compliance of the proposed approach to the SPD with the London Plan (2021) and associated London Plan Guidance (LPG).

- 4.3 In response to the informal GLA officers' feedback, the title of the SPD has been amended to include the words 'Building Heights' in order to avoid confusion between this SPD and Policy D9 of the London Plan (2021), which is called the 'Tall Buildings Policy'. In general, the GLA is supportive of this SPD.
- 4.4 With regard to the potential conflict between applying the SPD and the requirements as set out in Policy D9 of the London Plan (2021), as noted above, the draft SPD adopts a traffic light system with explanatory text to guide applicants how and when to use the SPD depending on the specific development proposal (i.e. whether the proposal represents a 'tall building' as specifically defined by the London Plan, or a 'contextually tall' building as identified by the building heights within the locality of the development (following the formulae set out in the draft SPD).
- 4.5 It is considered that the proposed changes should adequately address the concerns raised by the GLA, and maintain the outcomes originally sought by the SPD as the approach remains as set out in the report to the PPAP meeting on 3rd October 2022.

Metropolitan Police (MET) (Secure by Design)

- 4.6 The MET (Secure by Design) constitute a statutory consultee who will be consulted in relation to the draft document. Informal consultation was undertaken to allow the drafting process for the SPD to be informed from an early stage of the Secure by Design issues that taller buildings / proposals where higher density is proposed present, whereby ensuring guidance can look to address such issues early in the drafting.
- 4.7 The feedback points raised from the MET are noted as the following:
- Separate staircase provided for fire escape only
 - Cycle storage facilities should be behind two lockable doors
 - Storage areas should not hold more than 70 cycles
 - Bin Storage
 - Postal Strategy
 - Ground floor use
 - Podium access
 - Roof access

Harrow Design Review Panel (DRP)

- 4.8 Harrow's Design Review Panel is a panel of suitably qualified / experienced architects / development professionals that provide independent reviews of developments and emerging policy documents. The draft SPD was presented to a panel and the summarised points noted below:
- The relationship between the draft SPD and the draft Small Sites Design Code SPD should be clarified.

- Setting out a Council Vision for tall buildings, height and sensitive densification across the borough.
- The SPD should make best use of case studies and precedents, using those from across London as opposed to simply within the borough, so as to better illustrate guidance points and set high aspirations for future development.
- Officers are advised to simplify design guidance theme headings and provide a clear definition for what these mean in the explanatory text.
- Design guidance text should be condensed and made simpler, along with the graphic design of the document.
- More guidance / greater emphasis on family living, in terms of appropriate locations for family sized homes, additional guidance on play space.

Internal consultation

4.9 Internal Harrow departments have been consulted in the process of drafting the guidance and images for the SPD, by reason of potential densities of such schemes having potential impacts / servicing requirements on several services provided by the Council. Specifically, the following internal departments were consulted:

- Development Management (x2)
- Highways Authority
- Waste Authority
- Drainage Authority
- Environmental Health
- Landscape / Biodiversity

4.10 The feedback provided from the above stakeholders have assisted in the drafting of the SPD, with comments included where appropriate.

Planning Policy Advisory Panel

4.11 In the preparation of the Tall Buildings ('Building Heights') SPD, the Planning Policy Advisory Panel (PPAP) was presented to twice (3rd October 2022 and 9th January 2023) to provide detail of the progression of the SPD and seek feedback from the panel.

4.12 The presentation provided to the October meeting of the Panel set out the reasoning for bringing forward a Tall Buildings ('Building Heights') SPD, the policy context and the proposed themes / objectives and principles which the SPD would be progressed upon. Members were asked to note the report, the proposed approach and agree to progress with drafting the SPD.

4.13 The presentation provided to the January (2023) meeting provided a draft SPD which expanded upon the Themes / Objectives / Principles that were proposed and agreed at the October PPAP. The draft SPD was provided as an appendix, and included the draft guidance text, and

some images. The Panel was invited to comment on the report and draft SPD.

- 4.14 The minutes of each of the Panel meetings are attached as Appendix 2 of this report. Officers have sought to amend the draft SPD to reflect feedback from members of the Panel.

Formal Consultation

- 4.15 The paragraphs above outline the informal internal and external consultation that has informed the development of the draft SPD. In undertaking formal consultation on the draft SPD, this will need to follow the statutory process for the preparation and adoption of SPDs, including consultation in accordance with the Harrow Statement of Community Involvement (SCI).
- 4.16 Ward Councillor input will be sought during the formal consultation on the draft SPD.
- 4.17 Details of the consultation are being developed, but in general terms is anticipated to involve:
- a. SPD published on Harrow online engagement portal, which will include 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 sent to consultees on the Local Plan database, who have indicated they are interested in Planning Policy consultations;
 - g. Engagement sessions consisting of two online events
- 4.18 The consultation will be open for a minimum period of six weeks and will commence as soon as practicable following the approval to consult by Cabinet. The outcome of the consultation, and any resulting amendments to the SPD, will be reported to the PPAP, advising them of the consultation responses received and proposed amendments to the draft SPD, and then to Cabinet as part of the adoption process. 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.

5.0 Environmental Implications

- 5.1 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.

6.0 Data Protection Implications

6.1 Consultation will be 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.

7.0 Risk Management Implications

Risk included on Corporate/Directorate risk register? No
 Separate risk register in place? No

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

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

Risk Description	Mitigations	RAG Status
The Council continues to rely on the existing local plan until 2025 and the guidance contained therein with the potential for this to adversely impact on the Council's ability to achieve its vision/mandate of Putting Residents first	<ul style="list-style-type: none"> ▪ Progress with the Tall Building ('Building Heights') SPD to assist with providing contemporary guidance for developments that propose buildings of height. 	Green
Non-compliance with regulatory requirements for the preparation of guidance (i.e. the scope of the guidance, process) resulting in the SPD being declared unlawful	<ul style="list-style-type: none"> ▪ Scope of guidance will have regard to previous Counsel advice regarding this matter ▪ Consideration to be given to obtaining further Counsel advice on the draft document to confirm statutory compliance and to advise on the robustness and defensibility of the document ▪ Process (including formal consultation) managed to ensure it complies with regulatory requirements 	Green

Risk Description	Mitigations	RAG Status
Non-(general) conformity / consistency with Harrow development plan (i.e. London Plan, Harrow Local Plan)	<ul style="list-style-type: none"> ▪ Drafting to be undertaken in context of existing development plan. ▪ Opportunities to expedite ('twin-track') the 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. ▪ Informal consultation has been undertaken with the Greater London Authority (GLA) to ensure compliance with the London Plan (2021) 	Green
The Council does not undertake a strategic environmental assessment (SEA) in relation to the SPD	<ul style="list-style-type: none"> ▪ Local Plan (and therefore policies) was subject to SEA prior to its formal adoption. 	Green
Consultation on the SPD is not undertaken in a manner that complies with the relevant requirements of the General Data Protection Regulations (GDPR)	<ul style="list-style-type: none"> ▪ Direct consultation is with people who have requested to be consulted and their personal information is not made publicly available to other people ▪ Consultation will be undertaken in close collaboration with Harrow Communications section to additionally protect any potential disclosure of personal information 	Green
There is insufficient consultation with both external and internal stakeholders	<ul style="list-style-type: none"> ▪ Internal Stakeholders ▪ Internal stakeholder have already been consulted with in the preparation of the draft, such as Development Management and Highways, and any changes in the plan as a result of external consultation will be brought back to internal stakeholder where relevant ▪ External Stakeholders 	Green

Risk Description	Mitigations	RAG Status
	<p>The draft SPD will be publicised via press, on-line and mail-out channels and also on-line publicly accessible events. These will run for the statutory timeframe for consultation.</p>	
<p>Residents and Members not satisfied with the document</p>	<ul style="list-style-type: none"> ▪ Consultation feedback to be addressed and amendments made to SPD to address comments received where appropriate ▪ 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. 	Amber
<p>Lack of clear definition of minor or major amendments leads to inappropriate agreement of changes.</p>	<ul style="list-style-type: none"> ▪ Process to date has involved detailed and substantial consultation as set out above in the report, including internal consultation. This has ensured that that any major amendments would have been identified and there should not be anything more than minor changes required to the document at this stage. 	Green

8.0 Procurement Implications

8.1 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. Any external consultancy support (such as facilitation of online consultation events or external legal advice) would be modest in value and procured in accordance with the applicable procurement procedures. Funding for this will be from the existing Planning Policy budget.

9.0 Legal Implications

- 9.1 Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (“Regulations”) set out the statutory process for the preparation, consultation and adoption of supplementary planning documents. Failure to comply with the statutory procedures set out in the Regulations could open the Council to legal challenge.
- 9.2 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.
- 9.3 The Council is required by law to consult on the draft SPD and to consider all consultation responses received before adopting the SPD. Regulation 12 specifically requires that the Council must prepare a statement setting out the persons it consulted when preparing the SPD, a summary of the main issues raised by those persons and how those issues have been addressed in the SPD.
- 9.4 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 draft SPD supplements Policy DM1 (Achieving a High Standard of Development of the Harrow Development Management Policies Local Plan (2013) and Policy D9 (Tall buildings) of the London Plan 2021.

10.0 Financial Implications

- 10.1 The cost of preparing and implementing the guidance on tall buildings will be met from Planning Policy Team and Development Management (Urban Design) resources. Any additional external costs (such as those identified in paragraph 8.1 above) would be met from within existing revenue budgets.

11.0 Equalities implications / Public Sector Equality Duty

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

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

- 11.2 The relevant protected characteristics are age, race, disability, gender reassignment, pregnancy and maternity, religion or belief, sex and sexual orientation.
- 11.3 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.
- 11.4 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.

Council Priorities

1. A council that puts residents first

The draft Tall Buildings ('Building Heights') Supplementary Planning Document is a manifesto commitment by 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. Consultation will enable residents (and other stakeholders) to influence the draft document before it is formally adopted.

2. A borough that is clean and safe

The draft 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 draft 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: 25 January 2023

Statutory Officer: Abiodun Kolawole

Signed on behalf of the Monitoring Officer

Date: 25 January 2023

Corporate Director: Dipti Patel

Signed by Corporate Director

Date: 27 January 2023

Head of Procurement: Nimesh Mehta

Signed by the Head of Procurement

Date: 19 January 2023

Head of Internal Audit: Neale Burns

Signed on behalf of the Head of Internal Audit

Date: 1 February 2023

Has the Portfolio Holder(s) been consulted? Yes

Mandatory Checks

Ward Councillors notified: No, as it impacts on all Wards. Members will be notified of the consultation process if agreed by Cabinet.

EqIA carried out: NO – refer to paragraphs 11.0 – 11.4 above

EqIA cleared by: N/A

Section 4 - Contact Details and Background Papers

Contact: Callum Sayers, Principal Policy Planner,

callum.sayers@harrow.gov.uk

Background Papers:

- [National Planning Policy Framework \(2021\)](#)
- [London Plan \(2021\)](#)
- [Harrow Local Plan](#)
- [Harrow Statement of Community Involvement \(2013\)](#)

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