



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

This report provides initial feedback on the formal consultation exercise carried out on Harrow's New Local Plan (2021-2041) Initial Proposals (Regulation 18), between 26 February and 25 April 2024.

It also provides the Panel with an update on the Local Plan process since it last considered the matter in January 2024 and outlines the next steps.

### **Recommendations:**

The Panel is requested to note:

- (A) The Regulation 18 Consultation and Engagement Feedback report as set out in Appendix 1.
- (B) That further engagement with stakeholders will continue through to Regulation 19 stage
- (C) The update provided in relation to the local plan process and next steps.

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

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

## **Section 2 – Report**

### **1.0 Introduction**

- 1.1 This report relates to the new Harrow Local Plan and:
  - (a) provides feedback on the consultation carried out as part of the Regulation 18 stage during the eight weeks over February-April 2024;
  - (b) sets out the scope for further on-going engagement with stakeholders in the run up to Regulation 19
  - (b) provides the Panel with an update on the Local Plan process since it last considered the matter in January 2024

### **2.0 Options considered**

- 2.1 The option of not providing an update nor seeking feedback or comment was considered and dismissed as this would not give the Panel the opportunity to monitor and comment on something within their Terms of Reference. The Harrow Local Plan is one of the key documents in the Council's policy framework. Member input, through the Panel, is an essential part of the process.

## 3.0 Background

- 3.1 The new Harrow Local Plan will replace the existing adopted Harrow Local Plan, which currently consists of a package of documents:
- a. Core Strategy – adopted February 2012
  - b. Development Management Policies – adopted July 2013
  - c. Harrow and Wealdstone Area Action Plan (AAP) – adopted July 2013
  - d. Site Allocations – adopted July 2013
- 3.2 These form the Council's statutory development plan, alongside the London Plan [and any future neighbourhood plans prepared by community groups ('neighbourhood forums')]. Consistent with contemporary national policy, the existing 'framework' of Local Plan documents will be replaced by a single Local Plan document.
- 3.3 The Council has committed to preparing a new Harrow Local Plan. This is in response to the time that has elapsed since the current Local Plan was adopted (2012 and 2013) and changes in national and regional planning policy since that time, as well as emerging issues and local priorities. The new Local Plan will cover the period from 2021 to 2041.
- 3.4 The Panel has formally considered the new Harrow Local Plan at six previous meetings:
- (a) *9 January 2023*: the Panel considered a report in relation to the Council's Local Development Scheme (LDS). The LDS is a rolling three-year project plan setting out all the planning documents to be produced by the local authority and the timetable for their preparation. The draft LDS considered by the Panel committed the Council to prepare a new Local Plan, with adoption scheduled for December 2025. The LDS was subsequently agreed by Cabinet on 16 February 2023.
  - (b) *6 March 2023*: the Panel considered a report that introduced the Local Plan process in more detail and key issues that it will need to address. It sought comments and discussion from the Panel to assist in the scoping of the Local Plan, including its broad vision and objectives, to inform drafting of the new Local Plan.
  - (c) *13 July 2023*: the Panel considered the revised Statement of Community Involvement (SCI) which sets out how the Council will consult on planning matters, including the draft Local Plan. The revised SCI was subsequently adopted under delegated authority on the 2<sup>nd</sup> February 2024. The draft document was subject to a 21-day period of consultation in mid-2023.
  - (d) *18 September 2023*: the Panel considered the draft Infrastructure Delivery Plan (IDP) Context Report, which sets the context for the full IDP, which is expected to be completed in the middle of this year (in time for the second round of consultation

- on the draft Harrow Local Plan). The full Infrastructure Delivery Plan is required as part of the Evidence Base for Local Plans
- (e) *2 November 2023*: the Panel considered the draft Borough Profile, Spatial Vision and Strategy and Strategic Objectives for the new Local Plan. The Borough Profile sets the context for the plan. Within the plan, the Spatial Vision and Strategy, and Strategic Objectives provide the overarching narrative for the document from which detailed provisions / policies follow.
  - (f) *22 January 2024*: the Panel considered the full version of the Draft new Harrow Regulation 18 Local Plan and appendices including the draft Interim Integrated Impact Assessment (IIA) advice note. Other than some subsequent minor amendments and insertion of background/process material, this was essentially the version presented to Cabinet on 15 February 2024, and subsequently agreed to go out to public consultation between 26 February and 25 April 2024. The Panel also noted the proposed consultation arrangements that were going to be deployed and that a summary of the consultation feedback would be presented to the Panel mid-2024.

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

## **4.0 Regulation 18 Consultation**

- 4.1 Since the Panel's January 2024 meeting, considerable work was undertaken ahead of the start of the public consultation in February 2024 including finalising the Regulation 18 document and associated documents prior to publication, organising the consultation and engagement programme and preparing all consultation materials, web-based information and questionnaires.
- 4.2 The consultation itself ran over an eight-week period between 26 February and 25 April 2024. The Initial Consultation Report attached as Appendix 1 sets out the scope and extent of consultation that included a range of activities, events and methods of engagement.
- 4.3 There are minimum statutory requirements for this consultation, as set out in 'Regulation 18' of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) ("the 2012 Regulations"). Such minimum requirements are also reflected in the Council's adopted Statement of Community Involvement (SCI).

- 4.4 As a minimum, the Regulations require the local planning authority to notify and invite representations on the content of the draft plan to:
- (i) such specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;
  - (ii) such of the general consultation bodies as the local planning authority consider appropriate; and
  - (iii) such residents or other persons carrying on business in the local planning authority's area as the local planning authority consider appropriate.
- 4.5 The consultation exercise went beyond the minimum requirements set out above. Measures undertaken to make the public and other stakeholders aware of the consultation and the relevant documentation included:
- Writing to people on the Council's Local Plan consultation database (email or letter), with regular follow-ups and reminders
  - Making available the draft Plan, supporting documents (i.e. Integrated Impact Assessment) and evidence base were included on the Council's website and My Harrow Talk Engagement Platform
  - Making available hard copies of the draft Local Plan to view at Greenhill Library, and all other libraries in the borough, as well as at Harrow Leisure Centre, and Harrow Council hub (by appointment)
  - Erecting large display columns ('toblerones') with information on the local plan and how to respond at the key locations listed above
  - Placing full page advertisements in the Harrow Times newspaper (x2)
  - including a full page article within the Harrow People magazine distributed to every household in the borough (c. 100,000 copies) during the consultation period
  - Regular features in the Council's weekly e newsletter (My Harrow News) -distributed to c.130,000 email addresses.
  - Distributing leaflets with key information at a range of events and events and within the community-a total of 4,500 leaflets were distributed.
  - Using Social media to promote the consultation and related events
- 4.6 A number of ways of responding to the consultation were provided including writing in, by email or through an on-line questionnaire.
- 4.7 The on-line questionnaire included a highly visual 'Storymap' on the Urban Intelligence platform through the use of chapter summaries, supported by graphics. The Storymap sought to take the consultee on a journey through the various chapters of the new Local Plan with a series of questions and multiple-choice answers. There was also an

'open text' section on every section to allow the consultee to provide additional commentary.

4.8 These were supplemented by three 'quick polls' on key topics including housing, the environment and infrastructure with consultees during the consultation.

4.9 The consultation also included a number of events and meetings involving face to face contact with the public. These included:

- Six street events in locations across the borough (Rayners Lane, Wealdstone, Central Harrow, Stanmore, Harrow Weald, South Harrow) at various times and days of the week, including weekends
- Drop-in sessions on every Tuesday during the consultation period at the Conversation Café, St Peters Church, West Harrow
- Six stakeholder meetings with various groups including health providers, community groups and residents' groups and societies.

4.10 Feedback from the street events and Conversation Café has been recorded and is summarised in the Initial Consultation Report in Appendix 1 (section 3). A range of views were expressed including both support and concerns on a number of topics including:

- Urban environment
- Local area specific concerns
- Development and housing
- Environment and social policy
- Other comments relating to regeneration and development sites

4.11 In terms of written responses, the Council has received:

- 136 questionnaires via the Urban Intelligence platform (of which 90 were returned as pdf versions)
- 116 other non-statutory responses
- 30 responses from Statutory Consultees
- 3 petitions (signed by a total of 220 individuals)
- 45 questions from the public on Engagement HQ
- Public participation in three 'quick polls'
- Comments at six 'Street Events'
- Comments at the Conversation Café

4.12 Officers are still in the process of preparing individual responses to these, and so it is not possible at this stage to report back in detail. However, some general feedback can be provided to give a sense of the headline comments that have been made. This is set out below, and in many cases, the general public responses echo the comments made during the in-person events, as summarised in the Initial Report

of Consultation on the Draft New Harrow Local Plan (Regulation 18) attached as Appendix 1.

## **Consultation headlines:**

### **General**

- Generally positive feedback, respondents are glad to see progress on a new local plan.
- The statutory consultees have provided very specific feedback on each of the policies that relate to their area of focus including heritage, environment, transportation and infrastructure. These will need to be discussed with internal council departments in formulating responses to them and any amendments required to the draft Plan.

### **Growth and Spatial Strategy**

- Most Statutory Consultees / Agents agree with the spatial strategy and directing growth to Opportunity Area
- A significant number of local representations disagree stating that growth should be spread more evenly across the borough and concerns around tall buildings, the changing character of the area and a perceived lack of infrastructure to support the amount of housing proposed.

### **Design and Heritage**

- General support for design and heritage policies.
- Need to consider provision, design and suitability of new buildings/family homes for people with disabilities, including mobility disabilities and ensure that wider spaces are also accessible and have suitable facilities such as disabled toilets and parking.

### **Tall Buildings**

- A significant amount of opposition towards tall buildings in terms of height and their location being concentrated in the Opportunity Area. This has been compounded in light of the Tesco development planning application
- Support from housebuilders / agents, for the tall buildings policies although some seek greater maximum appropriate heights.

### **Housing**

- The housing chapter has had mixed support. There is significant support for the delivery of more family homes, affordable housing and additional controls on HMOs and flat conversions.

There is mixed support for the backland, infill and small sites policies.

- Some comments from house builders raising concern with the Councils ability to meet the housing targets – and where this will be met given the Opportunity Area target (7,500 homes out of a total 16,040 homes for the plan period 2021-2041).
- Public representations expressed concern there is too much housing being sought – specifically about knock-on impacts on infrastructure.
- A number of agent/developer representations in support of the Large Scale Purpose Built Shared Living policies and are seeking to amend policy to be more supportive.

### **Infrastructure**

- Several public/non-statutory respondents stated that some forms of infrastructure in the borough were currently lacking and expressed the view that additional housing would place pressure on an already burdened infrastructure system.
- There is a perceived deficit in some infrastructure forms in the Opportunity Area (health services and schools etc)

### **Green infrastructure and Climate Change**

- Significant support shown toward the green infrastructure and climate change policies. There is a strong appetite to protect and enhance greenery, biodiversity, open spaces, and respond to the climate emergency.
- There is also support specifically around biodiversity net-gain.

### **Transport and Movement**

- There is support for the transport and movement policies, particularly increased focus on public transport, active travel and support for EV charging.
- The parking policies have seen mixed responses
- A local campaign centred around the Harrow Mosque argues for higher parking standards (in excess of the London Plan standards)
- The GLA have requested that we remove the 'minimum' parking standards stipulated in the current policy.

### **Employment**

- General support for economic policies with regard to retaining / creating jobs.
- Some concern expressed that the 1000 jobs target within the Opportunity Area may not be achievable given the floorspace pressure.



## **Response Rate**

- 4.13 Just under 300 responses across all platforms were received (around 500 in total if individual signatories to the petitions are individually counted). The consultation website has seen a significant amount of traffic overall at 3,600 visits. On this basis, it is considered that awareness of the consultation has been high, although this has not resulted in a commensurate level of responses.
- 4.14 There are likely to be several reasons for this; the Regulation 18 version of Local Plan did not propose any site allocations, contentious policies [from a National Planning Policy Framework (NPPF) / London Plan perspective] or changes to the green belt. Several of the policies and strategies in the emerging plan are also a broad continuation of the existing local plan and reflect the London Plan requirements, including levels of housing growth.
- 4.15 As a benchmark, the level of responses to the Regulation 18 consultation equates broadly to levels of responses (178) to the Tall Buildings (Building Heights) SPD consultation in 2023, and on this basis the level of responses to the Regulation 18 local plan has been reasonably good by comparison, especially given recently there has been a noticeable reduction in response rates to any form of consultation or engagement across London.
- 4.16 It is likely that response levels will be significantly higher at the next stage (Regulation 19) when site allocations are brought forward for consultation. These generally raise much more attention as people tend to be more interested in development that will directly affect them, in terms of the type of development proposed and the proximity to where they live.
- 4.17 It should be noted that whilst the formal Regulation 18 Consultation has now ended, further opportunity to engage in the preparation of the new Local Plan continues to take place in the run up to Regulation 19 stage through discussions with statutory bodies, the GLA, neighbouring authorities (also as part of 'Duty to Cooperate' obligations) and other stakeholder and community groups, and the views of the general public can continue to be submitted.

## **5.0 Call for Sites**

- 5.1 As part of the plan-making process, authorities are required to undertake an assessment of land availability that identifies a future supply of land which is suitable (in terms of location, policy and constraints), available (in terms of land ownership, timing and phasing), and achievable (in terms of infrastructure requirements and viability) for housing and economic development uses over the plan period. As part of this, the Council undertook a 'Call for Sites' exercise alongside the Regulation 18 consultation.

- 5.2 The process invited landowners, developers and other stakeholders to put forward any large sites (over 0.25 ha) that could potentially be considered for allocation for development in the new Harrow Local Plan. A total of 41 sites were submitted for consideration to the Council (including nine sites taken forward/confirmed from a previous exercise in 2023). These are currently being reviewed by officers and assessed against their suitability, availability and achievability as part of a systematic approach to see if they can be allocated for development in due course. Further work will also include undertaking design and capacity assessment on appropriate sites.
- 5.3 Site allocations will be important in demonstrating how the Council will meet a range of development needs in future. Specifically in relation to housing, whilst the Council can currently identify a sufficient supply to meet the bulk of its London Plan-derived targets up to 2041 (based on sites under construction, with permission or existing allocations – assuming these are carried forward into the new plan), the Regulation 18 version of the Plan identifies a potential shortfall of around 1200 homes towards the latter part of the plan period. It is crucial that sufficient sites/capacity can be identified to meet these needs in order for the plan to meet the ‘tests of soundness’ when assessed by an Independent Inspector at the examination in public (EiP).
- 5.4 Whilst the Call for Sites consultation that ran alongside the Regulation 18 consultation has ended, the Council will still consider sites that are put forward by developers, landowners, and other proponents between now and the Regulation 19 stage. These will be assessed in the normal manner as described above.
- 5.5 Site allocations will be included as part of the next version of the local plan- i.e. at the Regulation 19 stage. These will be reported to this Panel once the sites have been worked up ahead of the Regulation 19 consultation later in the year.

## **6.0 Next steps**

- 6.1 Over coming weeks, officers will review all the detailed comments received and provide suggested responses to these, including proposed changes to the emerging local plan where appropriate. These will feed into a full Report of Consultation that will be reported back to this committee ahead of the Regulation 19 consultation stage.
- 6.2 All draft Local Plans are examined by the Planning Inspectorate for ‘soundness’; plans must be found sound before they can be adopted by the Council. One of the ‘tests of soundness’ under the NPPF is that a plan must be ‘justified’. This means it must represent ‘an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence’ (NPPF, paragraph 35).
- 6.3 In order to progress the Regulation 19 document, a number of evidence base studies and other supporting documents will need to

be completed/updated over the next 3-4 months to ensure that the plan will be 'sound', These include:

- **Views Assessment;** the Council has commissioned a review of the original Harrow Views Assessment to assess whether original local views and vistas continue to be worthy of protection across the new plan period
- **Whole Plan Viability Assessment;** the Council has commissioned an assessment to in order to ensure that development as anticipated in the Draft Local Plan is deliverable, as in line with the National Planning Policy Framework (NPPF). This is both in relation to emerging policies and site allocations/development viability.
- **Transport data/modelling;** the Council is working with the GLA/TfL to explore transport network issues in Harrow in relation to planned growth/ improvements over the plan period, including public transport and active travel measures.
- **Strategic Flood Risk Assessment (Level 2);** in relation to the emerging site allocations, the Council has commissioned an assessment to assess, and help mitigate, against flood risk. This will follow on from the Level 1 work previously carried out by Harrow in conjunction with other West London authorities.
- **Infrastructure Delivery Plan (part 2)-** this builds on earlier work to consider the levels of infrastructure (education, healthcare, transport etc) that may be needed to support development and population growth in the borough over the plan period, with a more specific emphasis on emerging site allocations. Part 1 was considered by the Panel at its meeting on 18 September 2023.
- **Housing delivery-** ongoing monitoring of housing developments, especially on small sites, to provide an up-to-date housing trajectory and five- year land supply. The Council's 'Authorities Monitoring Report' (AMR) that monitors the performance of the current Local Plan will be updated as it forms part of the evidence base that justifies policies in the draft plan.
- **Open Space update-** in house mapping exercise to update maps in relation to previous 'PPG 17' open space study to log gains and losses in open space, and to highlight areas with deficiencies, and identify scope for potential connections between spaces.
- **Biodiversity Net Gain-** to further develop initial evidence base work to help support emerging policy GI3 on a target of a minimum 20% increase in habitat value for wildlife compared with the pre-development baseline (the national minimum requirement is a 10% increase).

- **Burial space-** to set out where provision is currently provided and what future need is likely to be, broken down by different faith groups. This will include a strategy to identify how and where any future provision may take place. This will be an interim piece of work that look forward at least to the next 5 years, pending a more detailed study in the future.
- **Integrated Impact Assessment (IIA)-** following on from the interim study published at draft Regulation 18 stage, this will be an assessment of the Regulation 19 Plan having regard to sustainability ('sustainability appraisal'), equalities ('equalities impact assessment') and health impacts ('health impact assessment'). An accompanying Habitats Regulations Assessment (HRA) will also be prepared. The IIA will independently test and help refine all policies (including changes) and emerging site allocations against a range of impacts.

- 6.4 As noted in previous reports to the committee, the Council has appointed Kings Counsel (Saira Kabir Sheikh KC) to assist the Council during the Local Plan process. An initial conference focused on key parameters influencing the Local Plan process. A second conference provided feedback on the emerging Local Plan policies and the Regulation 18 version of the policies / Draft Local Plan were updated to reflect feedback from Kings Counsel. A third more recent conference focussed on matters related to taking the plan forward to Regulation 19 stage. On-going advice will continue to be received from our KC as the local plan progresses through to the next stages.
- 6.5 As noted at the Panel's last meeting, there was some slippage in relation to the original LDS milestones (by approximately five months) due to staffing shortages at that time. However, with a full complement of staff now in place, it is anticipated that the lost time can be recovered during the latter stages of the plan-making process, with no overall change to the target adoption date by the end of 2025. The remaining key stages of the plan and anticipated milestone dates are as follows:
- Reg 19 Consultation: November- December 2024
  - Reg 22 Submission: March 2025
  - Examination/Hearings/Modifications: March- November 2025
  - Reg 26: Adoption: December 2025.
- 6.6 The LDS will be updated in due course if necessary to reflect actual timeframes closer towards submission of the draft Local Plan to Government for examination.
- 6.7 As the draft Local Plan progresses through the formal process, greater weight can be given to the draft policies when determining planning applications [NPPF paragraph 48 (a)]. In this regard, the draft Plan has undergone an initial round of consultation, and so some limited weight can be given to the draft policies at this point in time.

6.8 The precise level of weight that can be attributed to each policy will be determined according to the level of objection to the draft policies [para. 48(b)] and the degree of consistency with the NPPF and general conformity with the London Plan [para 48(c)]. This will be determined over coming weeks as the responses to the Regulation 18 consultation are analysed in detail, and further advice will be provided to assist with the determination of planning applications in due course.

**Ward Councillors' comments:** None- as affects all wards.

## Risk Management Implications

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

Separate risk register in place? **Yes**

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

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

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

Risk Description	Mitigations	RAG Status
<p>General election on 4 July 2024 has led to a change in government. Changes to the plan-making system and the NPPF now imminent but awaiting further details to assess implications.</p>	<ul style="list-style-type: none"> <li>▪ Assessment of government's plans as they emerge to assess future potential changes.</li> <li>▪ London Plan (being part of the Council's development plan) and contains housing targets that the Council needs to be in general conformity with; this should mitigate any short-term risk of changes to the NPPF impacting upon the process of preparing the new Plan</li> </ul>	<p><b>Amber</b></p>

## Procurement Implications

None – report for information and discussion only. Any procurement associated with the draft Local Plan has been undertaken in accordance with the Council's Contract Management Rules and have been below the value threshold for consideration by Cabinet.

## Legal Implications

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

Regulation 18 of the 2012 Regulations requires the local planning authority to notify and invite representations on the content of the draft plan to: (i) such specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan; (ii) such of the general consultation bodies as the local planning authority consider appropriate; and (iii) such residents or other persons carrying on business in the local planning authority's area as the local planning authority consider appropriate. Section 4 above outlines the consultation arrangements that were carried out and these went over and above the statutory requirements.

As set out in section 7 of this report, legal Counsel's advice has been sought on whether it will be necessary to carry out a further Regulation 18 consultation, specifically in relation to proposed site allocations. Counsel's advice is that there is no legal requirement to do this and on balance the risks associated with this approach are more than offset by higher risks and implications of a delay in the plan-making process.

The next stage, after this Regulation 18 consultation, is for the local planning authority to prepare a submission draft of the local plan (Regulation 19). All representations received during the Regulation 18 stage will be taken into account in helping to shape the submission draft. The submission draft will

then return to the Planning Policy Advisory Panel (and Cabinet) for further consideration. At the Regulation 19 consultation stage, representations will be invited on the soundness and legal compliance of the plan.

## Financial Implications

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

The estimated cost of the Local plan for 2024/25 is £495k and two growth budget bids totalling £297k are included within the Medium-Term Financial Strategy (MTFS) to fund this along with other sources of funding outlined in Table 1 below.

**Table 1**

<b>Additional costs</b>	<b>23/24 (£)</b>	<b>24/25 (£)</b>	<b>25/26 (£)</b>	<b>Total (23/24-25/26) (£)</b>
Evidence base / consultancy	212,500	177,500	30,000	420,000
Production / consultation / examination	50,000	40,000	295,000	385,000
Additional officer resource	137,000	278,000	105,000	520,000
<b>Total</b>	<b>399,500</b>	<b>495,500</b>	<b>430,000</b>	<b>1,325,000</b>
<b>Funding sources</b>	<b>23/24 (£)</b>	<b>24/25 (£)</b>	<b>25/26 (£)</b>	<b>Total (23/24-25/26) (£)</b>
MTFS growth funding bids (22/23 and 23/24)	206,000	297,000	377,000	880,000
Grant funding received	105,000	98,739	0	203,739
Existing revenue budget (consultancy)	25,000	25,000	25,000	75,000
Internal planning resource	63,500	74,761	28,000	166,261
<b>Total</b>	<b>399,500</b>	<b>495,500</b>	<b>430,000</b>	<b>1,325,000</b>

There is a risk of planning applications being submitted which do not accord with the adopted Local Plan and such applications progressing to planning appeals. These appeals have a financial cost to the authority, including potential award of costs to appellants.

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

## Equalities implications / Public Sector Equality Duty

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

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

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

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

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

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

Consultation on the emerging local plan allows stakeholder/resident views on the content of the document and any likely adverse impacts of policies and proposals on equality groups to be identified and carefully considered prior to the preparation of the final plan document. In this regard, feedback received at the Regulation 18 stage has for example highlighted the need for further detail on gender inclusive design and travel considerations to be included in the plan and this will be addressed as part of the Regulation 19 version.

The proposed submission version of the plan (at Regulation 19 stage) will be supported by an updated IIA / EqIA. Consultation arrangements will consider how to best engage with stakeholders having regard to the protected characteristics.

## **Council Priorities**

Please identify how the decision sought delivers this priority.

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

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



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

**Statutory Officer:** Archa Campbell

Signed on behalf of the Chief Financial Officer (by email dated 9 July 2024)

**Date:** 9 July 2024

**Statutory Officer:** Chileme Hayes

Signed on behalf of the Monitoring Officer (by email dated 5 July 2024)

**Date:** 5 July 2024

**Chief Officer: Viv Evans**

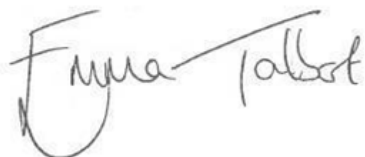
Signed by Chief Planning Officer



**Date:** 3 July 2024

**Divisional Director: Emma Talbot**

Signed by Director for Regeneration and Sustainable Development



**Date:** 9 July 2024

## **Mandatory Checks**

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

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

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

**EqlA cleared by: N/A**

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

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

### **Background Papers:**

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

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

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

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

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

New Harrow Local Plan (full Regulation 18 version)- Planning Policy Advisory Panel - 22 January 2024 (item 69) – [Agenda for the Planning Policy Advisory Panel on Monday 22 January 2024, 6.30pm- London Borough of Harrow](#)

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

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

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

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

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