

HARROW COUNCIL

ADDENDUM

PLANNING COMMITTEE

DATE: 20th November 2024

New Draft Harrow Local Plan 2021 – 2041 (Regulation 19) Submission Version: Weighting for Policies.

The Planning Committee is advised that the following table provides a starting point to refer to when considering and determining planning applications, which will need to consider both the currently adopted local plan policies and relevant policies within New Draft Harrow Local Plan 2021 –2041 (Regulation 19) Submission Version.

The general weighting to be applied to a planning application is set out within the table below following the Regulation 18 Consultation (Feb-April 2024) and the subsequent officer amendments made to form the Regulation 19 version of the plan. Each planning application will need to be considered on its own merit which may result in a different weighting being applied subject to the specifics of each application.

Policy	Limited	Moderate	Substantial	Full	Potential Unresolved Objection(s)	Response
SP 01: High Quality Growth		✓			Numerous representations received: linkages with Historic Environment, active travel, ambition of housing delivery outside of the O&A/into town centres especially along administrative boundaries/tube stations, distribution of growth. Protection of suburban areas adjacent to the OA. Development should be spread more across entire borough.	Directing growth to the OA which is the most sustainable location for growth. Sequentially growth can still occur outside of the OA in sustainable locations commensurate to the location (as set out in policy)

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GR1: Achieving a High Standard of Development			✓		Limited representations received: Refer only to London Plan internal space standards, not also the NDSS	No objection from GLA at Regulation 18 Similar to current local plan policy (DM1)
GR2: Inclusive Neighbourhoods		✓			Limited representations received:	N/A
GR3: Public Realm & Connecting Places		✓			Limited representations received:	N/A
GR3A: Inclusive Design		✓				Was not subject to Regulation18 consultation – New Policy following Reg18. Builds upon Inclusive Design Policy (D5) within the London Plan (2021) and draws together other design policies within the draft plan.
GR3B: Safety, Security and Resilience to Hazards		✓				Was not subject to Regulation18 consultation – New Policy following Reg18. Policy draws on other local plan policies and best practice guidance provided by MET Police.
GR4: Tall Buildings		✓			Numerous representations received. LBH definition does not include necessary plant and roof infrastructure in the definition (GLA)	Amendments made in response to most GLA Reg18 matters raised – likely to achieve conformity with London Plan (Policy D9) Based on evidence base – characterisation studies
GR4A: Basement		✓				Was not subject to Regulation18 consultation – New Policy

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						following Reg18. Builds upon Basement Policy (D10) within the London Plan (2021)
GR5: View Management		✓			Limited representations received: Relating to Historic Environment mainly	Amendments made where appropriate (or wider development plan addresses matters raised). Change from current local plan policy provides greater consistency with London Plan (Policy HC4) 2021
GR6: Areas of Special Character		✓			Limited representations received:	Amendments made where appropriate.
GR7: External Lighting		✓			Limited representations received: relating to Historic Environment and biodiversity.	Amendments made where appropriate.
GR8: Shopfronts & Forecourts		✓			Limited representations received: relating to Historic Environment	Amendments made where appropriate.
GR9: Outdoor advertisements, digital displays and hoardings		✓			Limited representations received: relating to Historic Environment	
GR10: Infill and backland sites, back gardens and amenity areas		✓			Limited representations received: Potential conflict with Garden Land SPD (Material consideration) Does not sufficiently support / encourage small site development and allow more intensive development. Should include all garden land including back gardens. Should	Policy is linked to Policy HO3 – Optimising the use of Small Housing Sites. Borough wide Characterisation Study assists with new development. Policy also seeks to reflect current policy with some minor clarifications.

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					require more strategic emphasis on contribution to biodiversity.	
GR11: Planning Obligations		✓			Limited representations received: Need to widen to include other infrastructure obligations	Policy is sufficiently worded to ensure all infrastructure providers are able to be considered.
GR12: Site Allocations		✓				Not previously consulted upon at Reg18. Site allocations seek to be policy compliance with the development plan.
Chapter 3: Historic Environment						
SP02: Historic Environment		✓			Limited representations received but significant amendments sought by Historic England.	Amendments made to address matters raised by Historic England.
HE1: Heritage Assets		✓			Limited representations received but significant amendments sought by Historic England.	Amendments made to address matters raised by Historic England.
HE2: Enabling Development		✓			One representation received: Enabling development does not form part of a positive strategy for the Historic Environment and should be removed.	KC advice taken about including such a policy and further dialogue with Historic England to amend policy to a point that it can be retained.
Chapter 04: Housing						
SP03: Meeting Harrow's Housing Needs		✓			High level of responses received. Issues in relation to; (1) whether the target should be above 16k homes (2) The Plan will fully meet needs, as it	1. The proposed housing target of 16k homes is in line with London Plan and National policies. London Borough's are not required to

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					<p>relies on small sites windfalls, unimplemented site allocations. Site within the Green Belt should be released to address housing needs.</p> <p>(3) The Opportunity Area should not accommodate 50% /+ of housing needs and other accessible locations should accommodate a higher proportion of needs.</p> <p>(4) The policy seeks to direct Build to rent schemes within the Opportunity Area. This is unjustified, contrary to the London Plan and other accessible locations should be considered.</p> <p>Issues relating to targets for older person accommodation, Gypsy and traveller pitches are included below.</p>	<p>base this on figures from nationally derived standard method.</p> <p>2. The Local Plan (Reg 19) includes an updated assessment of housing capacity from all sources (including allocations). This indicates the Plan may meet/exceed the housing requirement (16k) and is supported by Local Plan Viability Study, IIA and other evidence. No exceptional circumstances exist to justify the release of Green Belt sites.</p> <p>(3) In line with the London Plan, the Opportunity Area is expected to accommodate a significant proportion of housing growth. The broad locations for housing growth are based on unimplemented permissions, allocations.</p> <p>(4) Amendments have been made.</p>
HO1: Dwelling Mix		✓			<p>Numerous representations received. Issues in relation to; (1) the need for some flexibility for the provision of</p>	<p>(1) Amendments made in relation to the inclusion of flexibility for two bed four person units.</p>

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					two-bedroom four beds units,(2) the target of ensuring 25% of units are family homes within schemes may impact housing capacity and viability of sites. The unit size mix of affordable housing units should be clearly set out in line with the London Plan	(2) Underpinned by updated evidence base (LHNA 2024) stating need for 3 bed family homes. Carries over requirements from Core Strategy 2012 (Key Objectives) – albeit more explicitly set out in policy. Local Plan Financial Viability Assessment considers policy to be viable/sound
HO2: Conversion and redevelopment of dwellings		✓			Limited representations received. Issues in relation to parking and impacts of proposals on heritage assets/historic environment	Based on evidence such as LHNA, Census data. Amendments made in relation to these issues
HO3: Optimising the use of small housing sites		✓			Numerous representations received.; issues in relation to location of opportunities for tall buildings in well-connected and suburban locations / impact of -development on suburban character	Small housing policy in general conformity with Policy H2 (Small Sites) of the London Plan (2021) in terms of thresholds, and borough wide characterisation studies.
HO4: Genuinely Affordable Housing		✓			Numerous representations received. Issues in relation to Viability and providing 50% / Tenure Split too prescriptive / scheme application, shared ownership products may be delivered even though there is a lack of demand for these	Conformity with London Plan (2021) approach. Local Plan policies tested by FVA

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HO5: Housing estate renewal and regeneration		✓			Limited representations received. Issues in relation to the potential net loss of open space to deliver housing	Amendment made to supporting text to provide further clarity
HO6: Accommodation for older people		✓			Numerous representations received. Issues are (1) The target to deliver 980 specialist older person accommodation units over 10 years is too low and does not cover plan period, (2) More clarity in relation to the schemes types expected to provide affordable housing (3) schemes should be supported in locations within/edge of town and neighbourhood centres. (4) A higher % of wheelchair accessible dwellings should be required for schemes targeted at those aged 65+ and for multi-purpose rooms, used by visiting professional in care homes (. i.e. 100% wheelchair accessible units	(1 -3) Complies with London Plan Policy H13, National Policy and is informed by LIN Needs Assessment, Amendments to Policy SP3 clarify the supply of older person units will be monitored and needs assessment may be undertaken. (4) In line with the PPG and findings of the LIN study, amendments made, as suggested by respondent.
HO7: Supported and Sheltered Housing		✓			Single representation received seeking enhancement to supporting text. No issues raised.	Amendments made to supporting text RE importance of outdoor for health and wellbeing
HO8: Purpose-built student accommodation		✓			No representations received.	
HO9: Large scale purpose built and conversions for sharing	✓				Numerous representations received. Issues raised in relation to the requirement to demonstrate need, location requirements, flexible	Policy is a response to evidence base which seeks to restrict a use that there is limited evidence need to within the

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					design, distance test for over concentration and need to provide flexible work space.	borough. Seeks to align with London Plan requirements.
HO10: Housing with shared facilities (HMO)		✓			Limited representation received. Issues in relation to: Carparking / car free in certain locations / not in proximity to family housing / amenity of neighbours / character of an area	A number of matters addressed by other policies within the plan. HMO's still important to provide housing choice.
HO11: Self-build and Custom build housing		✓			Limited representation received. Issues raised in relation to need for a positive approach to support the delivery of community led housing.	Policy is drafted in line with National and London Plan policies. Plan provides sufficient guidance/support for community led housing
HO12: Gypsy and Traveller Accommodation Needs		✓			Limited representation received. Issue raised is that the Local Plan target for Gypsy and Traveller Pitches should be based on an updated needs assessment	In line with National Policy and London Plan, a pitch target has been included based findings of provisional GLA G & T accommodation need assessment
Chapter 5: Local Economy						
SP04: Local Economy		✓			Numerous representations received: Querying where jobs would be located and job deficit. Flexibility of uses within industrial estates, use of conditions. Use of own centres. Approach to growth where TC's share administrative boundaries.	Seeking generally conformity with London Plan policy – and where some variation from London Plan, this is underpinned by evidence base. Approach not objected to by GLA at Reg18 consultation.
SP05: Harrow & Wealdstone opportunity Area		✓			Numerous representations received: Regarding sustainable transport and consistency of terminology for	Amendments made where appropriate.

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					transport and historic environment. Job creation. Impacts of development on all users of an area. A plan for increasing jobs.	
LE1: Development Principles & Town Centre Hierarchy		✓			Limited representation received: Need to restrict certain Sui Generis uses. Consistency with other policies in the local plan and differentiating between uses around leisure. Locating sport uses in areas of deficiency	Amendments made where appropriate and consistency across other policies within the local plan.
LE2: Night-time and Evening Economy		✓			Limited representations received. Safety of Women and Girls, protection of cultural venues	New Policy prepared regarding safety, and strengthening of protection of cultural floorspace
LE3: Industrial Land		✓			Numerous representations received: Monitoring of capacity required, further encouragement in relation of industrial intensification, flexibility of uses.	Policy seeks conformity with the London plan, and where it varies from, this is based on local evidence base. No objection from GLA at Reg18 stage.
LE4: Culture and Creative Industries		✓			Limited representations received: Matters in relation to historic environment and protection of cultural venues.	Policy amended accordingly.
LE5: Tourism and Visitor Accommodation		✓			Limited representations received: Hotel provision should be reviewed on borough wide basis rather than site by site.	Changes not made as requested. Policy follows evidence base and conformity with London plan
Chapter 6: Social and Community Infrastructure						

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SP06: Social and Community Infrastructure		✓			Numerous representations received: Conformity with NPPF re sport provision, lack of specific numbers re provision in terms of schools, medical facilities etc, cultural floorspace provision.	Policy provides the framework to ensure such uses are retained or provided within the borough. The Infrastructure Delivery Plan provides more evidence on how much and where floorspace would be provided.
CI1: Safeguarding and Securing Social Infrastructure		✓			Numerous representations received: Conformity with NPPF, Burial Space provision, evidence requirements for release of social infrastructure, Community Use Agreements to be included, more flexibility in policy, explicitly listing cultural venues/end users.	Burial space provision is a sub-regional issue, and work is ongoing to resolve this at such a level (Duty to Cooperate). Other policies within the Local Plan address matters raised.
CI2: Play and Informal Leisure		✓			No representations received	
CI3: Sport and Recreation		✓			Numerous representations received: Amendment to existing mapping, conformity with NPPF and inconsistency with other local plan policies,	Appropriate amendments made to policy
CI4: Digital and Communications Infrastructure		✓			Limited representations received: No recommended changes to policies or issues raised.	No amendments required

Chapter 07: Green Infrastructure

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SP07: Green Infrastructure		✓			Numerous representations received: Reference to statutory biodiversity matrix, Link with historic environment, consistency with other local plan policies, maintenance issues, conformity with national BNG requirement (10%).	Appropriate amendments made, LPA proceeding with 15% based on evidence base.
GI1: Green Belt and Metropolitan Open Land		✓			Limited representations received: Consistency with NPPF, reference to existing developments within the Green Belt, seek to designate more MOL, enhancements to GB/MOL, green belt assessment	Amendments made where appropriate. Green belt review not being undertaken as part of new Local Plan (so no new GB/MOL designated or any de-designated).
GI2: Open Space		✓			Numerous representations received: Consistency with NPPF & SP07, increasing provision in areas of open space deficiency, reference other open space / sports strategies, access to wild or natural greenspace, green space per person	Policy amendments made where appropriate, Mapping to be undertaken.
GI3: Biodiversity		✓			Numerous representations received: impact of 20% BNG on viability (impacting AH provision) / flexibility when applying 20% on viability grounds / Impact on infrastructure / should comply with Statutory Requirement (10%)	In response the LPA has reduced BNG to 15% Evidence Base (LP Viability Assessment) confirms appropriate / viable.

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						Current LP (no policy basis) has sought and secured 20% BNG on site.
GI4: Urban Greening, Landscaping and Trees		✓			Numerous representations received: Potential fire risk of green walls, clarity between role of BNG/UGF, kerbside strategy to enhance green space, increasing tree cover, re-wording of policy.	Amendments made where appropriate. Some representations to be addressed by strategies outside of local plan policy.
GI5: Food Growing		✓			Limited representations received; links to other LBH planning documents – SPD's.	No change to policy required.
Chapter 08: Responding to the Climate and Nature Emergency						
SP08: Responding to the Climate and Nature Emergency		✓			Limited representations received: Consistency with stepped approach with government targets	ministerial statement does not preclude approach taken by policy as it is considered to be viable
CN1: Sustainable Design & Retrofitting		✓			Limited representatives received. Issues raised are; the need to include measure to improve water to efficiency (e.g. BREEAM Standards excellent "Wat01), viability, historic environment linked to policy, net zero target should not be advanced ahead of national timeframes and may impact viability, policy should focus on carbon emissions rather than efficiency	Amendments made where appropriate.

Policy	Limited	Moderate	Substantial	Full	Potential Unresolved Objection(s)	Response
Policy CN2: Energy Infrastructure		✓			Limited representations received. Impact on Infrastructure (MOD) / general conformity with London plan approach (higher standard but does not account for unregulated emissions.	HLP takes account of regulated and unregulated emissions (However, likely new London Plan to align with proposed approach as set in HLP). Approach already being progressed/negotiated successfully within active applications.
Policy CN3: Reducing Flood Risk	✓				Numerous representations received issues raised are; SFRA is outdated, categorisation of FZ3 in Clause D may encourage inappropriate development in FZ3b, that is contrary to national policy, need to include reference to potential sewer flooding (where insufficient infrastructure) and identify Green Infrastructure sites for recreation/flood management	In line with NPPF, the Plan has been informed by an updated SFRA has been. Minor amendments made, where necessary There are potential outstanding issues relating to this policy (e.g. part D) that need to be resolved with the Environment Agency via the Local Plan process
Policy CN4: Sustainable Drainage		✓			Limited representation received. Key point made are sites should be identified for Green Infrastructure for recreation/flood management.	This Policy has been drafted in Line with National and London Plan Policies.
Policy CN5: Waterway Management		✓			Limited representation received. Key point made are; the 8m for rivers should clarify this is from development and top of riverbank/culvert/ flood defences, and development and need to	This Policy has been drafted in Line with National and London Plan Policies. The Environmental Agency have raised no major concerns. Amendments made to Policy/supporting text

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					achieve better status of water bodies (WFD)	
Chapter 9: Managing Waste and Supporting the Circular Economy						
SP09: Managing Waste and Supporting the Circular Economy		✓			Numerous representations received. Only issue raised is that the waste management requirements should only apply to major developments.	This policy has been Drafted in Line with the London Plan Policy SI7. Minor amendments made to this Policy and Policy CE1 to clarify this matter.
CE1: Reducing and Managing Waste		✓			Single representation received. Only issue raised is that the waste management requirements of this policy should only apply to major developments	See above
CE2: Design to Support the Circular Economy		✓			No representations received.	
Chapter 10: Transport and Movement						
SP10: Movement		✓			Numerous representations received. Key issues are; inclusion of targets for journeys by sustainable transport modes; more details required in relation to transport infrastructure improvements; including sustainable transport improvements in areas of poor air quality, deprivation and low PTAL rating	Planning Policy Team have worked with Council's transport and infrastructure teams to investigate, address issues and will continue to work with stakeholders (including TFL) throughout Local Plan process. Amendments proposed to the policy and supporting text to address issues.
M1: Sustainable Transport		✓			Numerous representations received. Key issues are it should; safeguard land for new transport projects and	A Strategic Transport Assessment of traffic impacts is undertaken by TFL at a PAN London level.

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					protect/ enhance existing infrastructure, including for active travel; (2) details of existing/planned active travel routes that will be delivered in partnership with TFL should be mapped. (3) clarity needed on which local/ strategic networks may require work with neighbouring boroughs (4) no strategic transport assessment evidence has been provided	Planning Policy Team have worked with the Council's transport and infrastructure teams to investigate, address issues and will continue to work with stakeholders (including TFL) throughout Local Plan process. Amendments proposed to the policy and supporting text to address issues.
M2: Parking	✓				Numerous representations received. Key issue are; (1) TFL indicate inconsistency with London Plan due to; (a) need to clarify starting point is car free development in in well-connected locations and car lite in other locations; (b)the need to delete part b of the policy as London Plan seeks to reduce car parking, increase cycle parking; (c) Policy indicates reductions in car parking should not have an adverse effect on town centre vitality, viability, is contrary to the London Plan that seeks to reduce car usage and encourages increased use of sustainable modes of transport (H) and inconsistency exist between part H & G of the policy. Barnet seek	<p>Planning Policy Team have worked with Council's transport and infrastructure teams to investigate, address issues and will continue to work with stakeholders (including TFL) throughout Local Plan process. Amendments have been made, where appropriate.</p> <p>There are some local justifications for policy approach to car parking provision.</p>

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					clarity on factors that will be considered to justify departure from London Plan parking standards (. i.e. Part B). RE car free development, the supporting text is contrary to London Plan (T6) in terms of ensuring reasonable access to shopping, services.	
M3: Deliveries, Servicing and Construction		✓			Numerous representations received. Key issues are the policy should support proposals that facilitate sustainable freight movements; further consideration of facilities should be given to the role of and opportunities for shared consolidation for delivery and servicing	Amendments proposed to the policy and the supporting text in response to issues raised