



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

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

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

1.2 The purpose of a consultation statement is to;

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

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

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

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

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

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

2. Name of the Supplementary Planning Document (SPD)

2.1 Tall Building ('Building Heights') SPD

3. Purpose of the Document

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

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

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

4. Stakeholders consulted during preparation of the SPD

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

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

5. How were stakeholders formally consulted?

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

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

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

5.3 All formal consultation documentation is set out in Appendix 1

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

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

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

Statutory Consultee Responses

Greater London Authority / Mayor of London

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

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

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

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

building (by avoiding the word 'tall'), and the context-based approach used within the SPD.

- 6.6 GLA officers consider that the existing name of the document 'Tall Buildings ('Building Heights') SPD could result in a misleading and confusing message about the purpose and function of the document.
- 6.7 *Officer Response: The SPD seeks to provide guidance to ensure that suburban Harrow is protected from inappropriately tall buildings (among other material considerations), and to ensure high quality of design.*
- 6.8 *The title of the SPD provides a clear indication that the guidance within it relates to tall buildings. The content within the SPD however is very clear that the guidance for what would be a contextually high building in a suburban location, is not in conflict with definition of a tall building as set out in Policy D9 (Tall buildings) of the London Plan (2021). Chapter 1 of the SPD makes it clear where and when the SPD should be engaged, and that the London Plan (2021) as the spatial strategy still provides the definition of a tall building. Chapters 1 and 2 are clear that a context based analysis for proposals in suburban Harrow is undertaken, with Chapter 3 providing design guidance for contextually high buildings and also tall buildings (as per the London Plan (2021) definition*

Transport for London (Spatial Planning)

- 6.9 TfL (Spatial Planning) have provided a response to the draft SPD to reflect TfL's statutory duties as the strategic transport authority. The response received from TfL (Spatial Planning) amount to a number of minor amendments suggested to more accurately reflect relevant policy and guidance. Such amendments were limited to Design Principles C1 (Sustainable Locations), D5 (Transport and Parking), and D10 (Air, Noise and Microclimate).
- 6.10 *Officer Response: It is considered that the proposed amendments are minor, and would assist in better reflecting the relevant policy and guidance which the SPD seeks to be in general conformity. Including the amendments where appropriate would continue to ensure that the guidance set out in the SPD would remain robust.*

Transport for London (Infrastructure Protection)

- 6.11 TfL (Infrastructure Protection) is noted as responding to confirm no formal comments in relation to the draft SPD. However, to confirm that developments adjacent to TfL infrastructure will require consultation with TfL to be undertaken.
- 6.12 *Officer Response: This response is noted and consultation would be carried out as this is already undertaken. No amendments to the draft SPD are required.*

Environment Agency

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

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

Historic England

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

Natural England

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

General Responses

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

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

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

review, further mechanisms such as design codes are also available for the Council to consider.

- 6.43 Lack of infrastructure to support new development (Such as highways / doctors / school places)
- 6.44 *Officer Response: New development attracts a 'tax' through the Community Infrastructure Levy (CIL), which is collected by the Mayor of London and also by the Council. The purpose of collecting CIL money is to assist in the funding of new infrastructure.*
- 6.45 *Furthermore, the Council has an ongoing dialogue with infrastructure providers such as the NHS to understand their needs, and look to secure floor space for them within new developments where they have identified a need.*
- 6.46 *The SPD is not proposing a presumption in favour of new development, rather setting out guidance to assist in new developments being appropriate in height and of a high-quality design. Such proposals have been and are coming forward already, and without such detailed guidance. Funding infrastructure through the CIL is considered the appropriate mechanism for infrastructure improvements.*

7. Proposed Changes to the SPD

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

June 2023, Version 2.

Appendix 1 – Copies of consultation documents

Appendix 1A (Copy of letter)

Name and address

Date: 27 February 2023

Dear Consultee

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

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

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

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

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

Consultation Details

The consultation period runs from **Monday 27th February 2023 to Monday 17th April 2023**.

The Harrow Tall Buildings ('Building Heights') SPD, accompanying documents and details of consultation arrangements (including online consultation events) can be viewed online at

<https://talk.harrow.gov.uk/hub-page/planning>. The document can also be viewed at the following address:

Greenhill Library
Perceval Square
College Road
Harrow
HA1 1GX

Please contact us if you wish to discuss document access.

Consultation Responses / Representations

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

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

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

Any representations must be submitted before midnight **Monday 17th April 2023**.

Consultation Events

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

- Wednesday 8th March 2023 between 6pm and 7.30pm
- Tuesday 21st March 2023 between 6pm and 7.30pm

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

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

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

Yours sincerely,

David Hughes
Planning Policy Manager
Email: ldf@harrow.gov.uk

Appendix 1B (Copy of email)

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Yours faithfully

David Hughes
Planning Policy Manager
Harrow Council

Appendix 1C (Copy of public notice)

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

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

Title of the Document:

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

Subject Matter of the Draft Supplementary Planning Document

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

Period of Consultation

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

Making Representations

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

Email: ldf@harrow.gov.uk

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

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

Inspecting the Documents

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

Greenhill Library
Perceval Square
College Road
Harrow
HA1 1GX

Appendix 2 (Online Consultation Event Feedback)



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

Summary of proceedings

Report by Public Perspectives

Logistics

Date/Time:

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

Location: Via Zoom.

Objectives and Approach

Objectives:

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

Audience:

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

Promotion:

- Via councils' communication and consultation processes, including social media and on-line consultation.
- Direct communication with key stakeholders on planning and consultation databases.

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

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

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

Key themes, questions and comments

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

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

- Some participants sought **clarity about the definition of ‘What is a tall building’** and relationship to the 6 stories definition in the London Plan.
- Relatedly, some participants sought greater **clarity about the definition of ‘contextually tall’**. This includes being specific that it relates to stories rather than meters.
- Some participants were **concerned the SPD does not directly cover the Harrow and Wealdstone Opportunity Area, which could have implications for tall buildings both within the Opportunity Area and surrounding the Opportunity Area**. This said, participants generally appreciated that the SPD will influence what happens in surrounding areas and how the Opportunity Area boundaries stich in with the character of the surrounding area.
- Some participants sought **clarity about the role of the SPD, in terms of its weight and influence** compared with a Local Plan/planning policy.
- Relatedly, some participants sought **clarity about the relationship and linkages between the SPD and other related matters/documents/policies** such as traffic, infrastructure and environmental policies.
- Some participants **acknowledged and valued that planning decisions, including around heights, is a collaborative process between the council, developers and residents** to get the balance right around quality, height, density, housing targets, and stay within the spirit of SPD and the local planning framework.

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

Wednesday 8th March 2023

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

- **London Borough of Harrow:** As a material consideration the SPD (including 3.3.5) will assist in the Council in resisting such developments but as an SPD it cannot be said to definitely stop all such developments (as it cannot set policy, just supplement existing policies). The Local Plan review / new Tall Buildings Policy will ultimately be the strongest mechanism in that regard.

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

Poll results

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

Appendix 3 – [\(Consultation Response Spreadsheet\)](#)