



Harrow Local Plan Duty to Cooperate Statement Submission Version

February 2025

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1. Introduction

- 1.1 The Localism Act 2011 introduced the Duty to Cooperate by way of amendments to Section 33A of the Planning and Compulsory Purchase Act 2004, which came into effect in November 2011. It states that LPA's are 'to engage constructively, actively and on an on-going basis with neighbouring boroughs and other public bodies in the preparation of development plan documents 'so far as relating to a strategic matter.'
- 1.2 For the purposes of the Duty to Cooperate, a strategic matter is defined as sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas.
- 1.3 The National Planning Policy Framework (NPPF) (2023)¹ sets out the Government's planning policies for England and how they should be applied. The NPPF includes policies on plan-making including the Duty to Cooperate. It is accompanied by the National Planning Practice Guidance (NPPG) which provides further information to support the implementation of the national policies.
- 1.4 NPPF paragraphs 24–27 emphasise the need for local planning authorities to maintain effective cooperation during the plan-making process. It provides that this is integral to the production of a sound plan, one that is positively prepared and with a justified strategy for managing growth and meeting identified needs for development, including infrastructure. Cooperation can help to inform considerations as to whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
- 1.5 LB Harrow is currently in the process of preparing a new Local Plan, which will cover the period 2021 – 2041. The Council has recently completed the Regulation 19 consultation stage of the Local Plan process and is now seeking to progress to submission to the Planning Inspectorate.
- 1.6 Paragraph 27 of the NPPF requires strategic policymaking authorities to 'prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.' Harrow has prepared these statements subsequent to Regulation 19 to support the submission version of the plan.

¹ The New Harrow Local Plan (2021-2041) falls within the transitional arrangement as set out in Paragraph 234 of the National Planning Policy Framework (2024). Accordingly it will progress through the plan making process in accordance with the 2023 publication of the National Planning Policy Framework.

1.7 The purpose of this statement is to provide a written record of the progress made by the Council in fulfilling its obligations under the duty to cooperate. This document sets out which strategic matters have been co-operated on, with whom, and when. This includes reference to work that has been undertaken to date, as well as ongoing work. The format of this document is:

1. Identification of Duty to Co-operate Partners (Chapter 2)
2. Identification of key strategic matters (Chapter 3)
3. Setting out how co-operation has been undertaken (Chapter 3)
4. Statements of Common Ground (available at the time of submission) (Chapter 4)

2. Duty to Co-operate Partners

- 2.1 Harrow is a London Borough, and the Local Development Framework forming the borough's development plan includes not only the Local Plan documents, but also the London Plan, and the West London Waste Plan.
- 2.2 Harrow is part of the West London Alliance which brings together Harrow along with Ealing, Hillingdon, Brent, Barnet, Hounslow, Hammersmith and Fulham and the Old Oak and Park Royal Development Corporation (OPDC).
- 2.3 The West London Waste Plan geography differs from the above by reason of including Richmond upon Thames and excluding LB Barnet in order to reflect the area covered by the West London Waste Authority.
- 2.4 Harrow is directly bordered by four London Boroughs – Barnet, Brent, Ealing and Hillingdon; and two Hertfordshire districts – Hertsmeire and Three Rivers. As non-unitary authorities, the Council is also considered to have a boundary with Hertfordshire County Council.

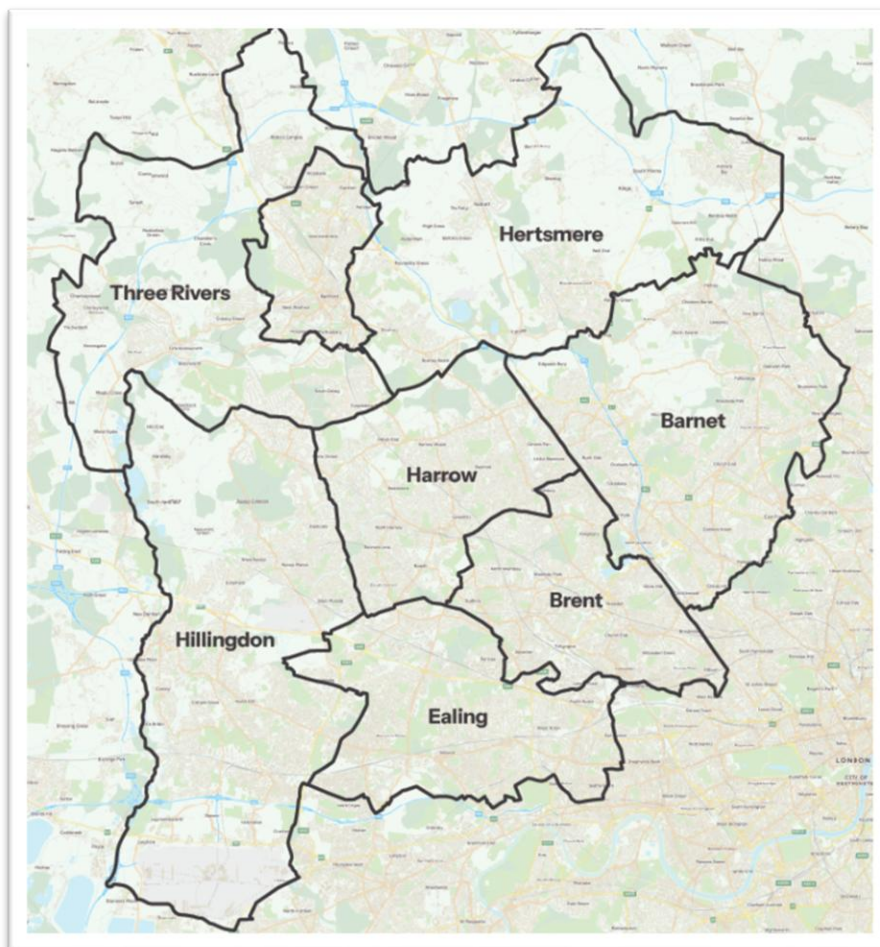


Image 1: LB Harrow Duty to Cooperate Neighbouring Authorities

2.5 For clarity, the list of Duty to Cooperate partners (as also set out below in the corresponding tables) that were engaged with is as follows:

- Greater London Authority
- London Borough of Barnet
- London Borough of Brent
- London Borough of Ealing
- London Borough of Hillingdon
- Hertsmere Borough Council
- Three Rivers District Council
- Environment Agency
- Historic England
- Transport for London

2.6 Certain other public bodies are also subject to the duty to cooperate. These bodies are sometimes referred to as statutory stakeholders. In Harrow, these bodies are:

- The Environment Agency
- Historic England
- Natural England
- Civil Aviation Authority
- Canal and River Trust
- Network Rail
- West London NHS
- Transport for London
- Ministry of Defence (MoD) (RAF Northolt)
- Highways England
- Metropolitan Police Service
- Thames Water

2.7 There are a wide range of stakeholders It is also incumbent on the Council to consider infrastructure matters when preparing a new Local Plan. To ensure that infrastructure is planned appropriately alongside growth, the Council has sought to engage with appropriate organisations in preparing an Infrastructure Delivery Plan to support the Local Plan. Engagement will continue with appropriate internal and external stakeholders as listed within Appendix 1 of the Harrow Infrastructure Delivery Plan (2024)²;

² [Harrow Infrastructure Delivery Plan \(2024\)](#)

2.8 A Regulation 22(1)(c) Statement has been prepared and sets out all representations received through the Regulation 19 consultation and sets out the corresponding responses from the Council. Strategic issues discussed with Duty to Cooperate partners raised as part of Regulation 19 consultation have been addressed within this document, and anything outstanding through Duty to Cooperate meetings is addressed through Statements of Common Ground with relevant parties.

3. Key Strategic Matters, and how Co-operation has been carried out

Greater London

- 3.1 Harrow is a member of London Councils, a non-partisan organisation that works on behalf London's 32 borough councils and the City of London Corporation. London Councils acts as a focal point for representing borough interests, informed by the political and professional networks that it runs with the Government, the London Mayor, the wider GLA and London's public service.
- 3.2 Harrow also participates in the Association of London Borough Planning Officers (ALBPO). Harrow council planning officers regularly attend meetings of the ALBPO Development Plans Committee, where cross-boundary strategic matters are discussed. The GLA and London Council's also attend these meetings to provide strategic and partnership input into these meetings respectively.
- 3.3 Harrow also participates in the London Waste Planning Forum (LWPF). The LWPF is a forum for local authorities and organisations focussed on planning for waste in London. For the local authorities, this is waste planning under their statutory responsibilities as planning authorities. This is distinct from their separate responsibilities for household waste collection and disposal. Waste planning authorities in London, the Environment Agency, and GLA, London Waste and Recycling Board, London Councils and other London organisations dealing with waste are members. The Forum provides a framework to support and coordinate waste planning in London. The Forum enables authorities to engage and cooperate on strategic waste matters that cross administrative boundaries. The LWPF makes collective responses to policy documents and the members of the Forum agree a consistent approach to waste planning, including the definition of strategic levels of waste movements for statements of common ground.
- 3.4 The Harrow Local Plan must be in general conformity with the London Plan, which is produced by the Mayor of London. The London Plan is the spatial development strategy for Greater London, ensuring a coordinated approach to spatial planning across all boroughs. The new London Plan was published and came into force on 2 March 2021.
- 3.5 Many of the strategic matters to be addressed through the Duty to Cooperate are, in London, a matter for the London Plan or are otherwise addressed through its preparation. This includes the spatial distribution of housing across London (including the wider south east and working with Local Plans prepared outside London near these growth locations), and the provision for employment land and other commercial areas such as town centres, strategic green infrastructure (including open space).

- 3.6 It also provides the framework for the delivery of strategic infrastructure (including transport, social infrastructure, waste management, utilities, and waterways), whilst recognising further details may be required in boroughs' Local Plans. This Duty of Cooperate Statement identifies the strategic matters that notwithstanding the London Plan, are of relevance to either LB Harrow and / or adjoining Local Authorities.
- 3.7 Development of the London Plan itself is a collaborative process, with joint working on several areas of evidence and considerable reliance upon boroughs to verify survey and supply data. These include the London Strategic Housing Land Availability Assessment (2017) and London Industrial Land Demand Study (2017).

Greater London Authority (GLA) / Mayor of London

Duty to Co-operate Meeting 12 January 2024 - Matters Discussed
<ul style="list-style-type: none"> • Draft Local Plan Policies & underlying evidence base • Greenbelt and Metropolitan Open Land • Tall Buildings • Industry • Waste • Housing <p>Feedback from this discussion was incorporated into the draft Regulation 18 Local Plan.</p>
Regulation 18 Response – Matters Raised
<ul style="list-style-type: none"> • Housing, • Affordable Housing, • Gypsy & Traveller Accommodation, • Tall Buildings, • Industrial Land, • Green Belt and Metropolitan Open Land, • Social Infrastructure. <p>Representations were considered and reflected into the Regulation 19 version of the Local Plan.</p>
Regulation 19 Consultation – Matters Raised
<ul style="list-style-type: none"> • Spatial Strategy, • Housing, • Affordable Housing, • Gypsy & Traveller accommodation, • Green Belt, • Metropolitan Open Land, • Industrial Capacity, Tall buildings, • burial space, • Waste, • Transport,

- Site Allocations.

Outstanding Issues to be Agreed

No strategic matters remain outstanding, the Mayor has advised that he considers the plan to be in general conformity with the London Plan. Limited issues will be discussed through the course of the EiP of Harrow's Local Plan.

It is proposed to enter into a Statement of Common Ground with the Greater London Authority / Mayor of London with respect to the matters raised at Regulation 19 to assist the draft plan to be more closely aligned with the London Plan.

Association of London Borough Planning Officers (ALBPO)

- 3.8 The Association of London Borough Planning Officers and officer sub-group meets quarterly, and discusses matters such as changes to national policy and London Plan matters. It also provides updates to local plans and other planning documents that London boroughs are progressing such as Supplementary Planning Documents and Article 4 Directions. LB Harrow is represented by an officer at each of these meetings. Such attendance allows the LPA to co-operate with other London boroughs through discussion at a strategic level of matters affecting all boroughs and sharing and learning from approaches adopted by individual boroughs.
- 3.9 The meetings are also attended by London Councils, and the Greater London Authority (GLA); who provide updates on their work, including lobbying central government, evidence base development and the production of policy documents. Duty to Cooperate partners (such as the Environment Agency) may attend to give presentations on their work.

West London Alliance

- 3.10 Quarterly meetings are held at Officer and Chief officer levels to coordinate and discuss planning work through the West London Alliance. Several strategic evidence base documents have been jointly prepared with some or all of these LPAs, including:
- West London Strategic Housing Market Assessment (2018)
 - West London Small Sites Strategic Housing Land Availability Assessment (2018)
 - West London Employment Evidence (2019)
 - West London Employment Land Review (2022)
 - West London Alliance GTAA Report (2018)
 - West London Local Area Energy Plan Report (2023)
 - West London Strategic Flood Risk Assessment level 1 (dynamic)
 - West London Strategic Infrastructure Delivery Plan (2021-40)

3.11 Preparation of these joint-evidence base documents have informed the Harrow Local Plan and reflected any relevant cross-boundary strategic matters.

Neighbouring Boroughs in London

3.12 Prior to the progression of the New Harrow Local Plan, LB Harrow Officers engaged in Duty to Cooperate with neighbouring boroughs as part of their respective local plan preparations and also in the context of ongoing close collaboration as part of the West London Alliance, or on shared projects (such as the joint Edgware SPD prepared with Barnet).

3.13 As part of the Duty to Cooperate, the LB Harrow has held one to one officer level meetings with all neighbouring authorities on several occasions. These meetings have occurred throughout the plan-making process and provided the opportunity to address strategic planning matters and cross-boundary issues affecting the authorities concerned. This included discussions around development proposals and infrastructure provision in the area. It also covered local plan evidence base and the scope to undertake any further joint working on relevant studies. These discussions have been taken into account in preparing the emerging new Local Plan.

3.14 The tables below outline the main meetings held with neighbouring London boroughs that have contributed to the duty to cooperate, including the identification of outstanding strategic matters and how they have been addressed. They also document the main issues raised by the neighbouring boroughs with respect to the draft Harrow Local Plan as it was developed.

London Borough of Barnet

Pre-Regulation 18 Discussions 2019 - 2023

- LB Harrow responded to a letter from Barnet Council seeking assistance to address their unmet housing requirement based on the standard method. LB Harrow confirmed it had no capacity to assist Barnet (13/12/2019)
- LB Harrow agreed a Statement of Common Ground with Barnet in relation to Barnet Local Plan (Jan 2022). This covered a range of cross boundary strategic matters. The key areas of agreement were; (1) Both Councils will meet their London Plan targets within their boundaries. (2) The authorities will continue to engage constructively in relation to tall buildings, particularly along the A5 (Administrative boundary) (3) The authorities will continue dialogue in relation to the joint Edgware Growth Area SPD; and maintaining the vitality, vibrancy of Edgware and Burnt Oak town centres

Regulation 18 Response – Matters Raised

- Housing need and housing target
- Tall buildings - Wish to incorporate locally important views into the designation of tall building locations in Harrow.
- Edgware - Seek a similar level of endorsement to that included in Barnet LP Policy GSS05.
- Transport - LB Barnet are seeking a joint-up approach to transport and parking in areas along the borough boundary. LB Barnet wish to understand the impacts arising from Harrow's Local Plan proposals - LB Barnet would expect any new hospital accommodating proposed in the green belt to be within LB Harrow.
- Green Belt/ Royal National Orthopaedic Hospital - LB Barnet would expect any new hospital accommodating proposed in the green belt to be within LB Harrow.
- Burial space - LB Barnet would like to understand how LB Harrow intend to calculate and accommodate needs.
- Flood risk
- Site allocations

Duty to Co-operate Meeting 15th April 2024 – Matters discussed

- Updates provided on Local Plan preparation. Noted a SoCG is in place between the Councils for Barnet's plan that is at EiP.
- LURA Discussion - Both authorities currently seeking to progress a plan under existing NPPF/ transitional arrangements.
- Government communication with Mayor of London on industrial land and potential implications of this. Both Boroughs to continue to progress plan making / policies as set out in policy but continue to monitor situation as per the timeframes set out within the correspondence.
- Infrastructure needs
- Development in the Edgware town growth area - LB Barnet and LB Harrow have collaborated on the Edgware Growth Area SPD to guide development here. LB Barnet confirmed that the key site in this SPD geographical area is currently in pre-application stage (Ballymore / Sainsbury's site). Application likely at the end of 2024.
- Cumulative impacts of development. LB Barnet relatively well covered given its current Local Plan position / updated evidence base. However, some issue with regard to Gypsy & Traveller Sites, as they have one application in for a new site. Gypsy & traveller provision likely to be met by Harrow within the borough.
- LB Barnet has an Office to residential Article 4 however this expired in 2022. Not identified to progress any further at this stage.
- LB Barnet seeking to progress the following Supplementary Planning Documents; Planning Obligations, Sustainable Design, Designing for Density. Preparation of small sites Design Code

Regulation 19 Response – Matters Raised

- Spatial Strategy
- Edgware Town Centre
- Flooding
- Transport impact, including a review of the proposed Site Allocations

Outstanding Issues to be Agreed

No strategic matters remain outstanding, plan is considered to be in general conformity with the London Plan. Limited issues will be discussed through the course of the EiP of Harrow's Local Plan.

It is proposed that a Statement of Common Ground be entered into between Harrow and the four neighbouring London Boroughs. A statement endorsed by Barnet, Brent and Ealing has been included in the examination library.

London Borough of Brent

Pre-Regulation 18 Discussions – 2019-2023

- LB Harrow provided a formal response to LB Brent Local Plan Preferred Options (3rd January 2019). Matters commented on related to Growth Areas, Places (spatial areas), Intensification Corridors, key site allocations, and specific draft borough wide policies.
- Duty to Cooperate Meeting held 9th April 2019. Matters covered where (1) Growth Areas, (2) Town Centres, (3) Intensification Corridors, (4) General Policies including housing, economy, green infrastructure and natural environment, and sustainable infrastructure.
- LB Harrow agreed a Statement of Common Ground with Brent in relation to Brent Local Plan 2019 (Signed April 2020). This covered a range of cross boundary strategic matters. The key areas of agreement were; (1) Both Councils will meet their London Plan targets within their boundaries. (2) The authorities will continue to engage constructively in relation to tall buildings, particularly with regard to the Northwick Park Tall Building Zone (within LB Brent) (3) Protected views across the boroughs and particularly development within the Northwick Park Hospital Growth Area.

Regulation 18 Consultation – Matters Raised

- Housing development- LB Brent support more ambitious housing delivery targets in LB Harrow.
- Aligned densities/ boundary developments - Wish to secure co-ordinated densities and uses on sites along the borough boundary.
- View management - Wish to work with the Council to ensure impacts of views through Brent are appropriately managed.
- Industrial land - Supports efforts to intensify industrial land.
- Biodiversity - Concerned 20% BNG could impede development.
- Transport.

Duty to Co-operate Meeting 11th April 2024 – Matters Discussed

- Updates provided on Local Plan preparation.
- Joint work is progressing on the Staples Corner, Church End, and Neasden Station masterplans.

- LB Brent noted Locally Significant Industrial Land has been identified for mixed use development, but there is limited appetite / viability constraints for co-location from developers.
- LB Brent expressed that provision of new, affordable housing in the borough was a key political priority.
- Delivery of small sites (LPP H2) an issue in Brent
- LURA Discussion regarding potential implications on planning in general.
- On boundary developments, Northwick Park site has outline permission, there may be an emerging proposal on the Westminster University site. Limited activity at Burnt Oak/ Colindale, although a Masterplan is identified to be produced.
- LB Brent support closer working on town centres along the borough boundary.
- LB Brent would support LB Harrow being more ambitious in terms of growth – It is noted that the two boroughs have very different supplies of previously developed land and political makeups. Both authorities will meet their respective London Plan housing targets.
- LB Brent needs to find capacity for approximately 45 additional gypsy & traveller pitches.
- The Councils have worked together with LB Hillingdon on SFRA1.
- Infrastructure development (health, transport, education, cemeteries, open space, leisure)
- LB Brent have constraints on burial space. Was found sound at EiP, but beyond 10 years there may be an issue – Both authorities support a strategic approach to identifying burial space across the wider region
- LB Brent have prepared several Article 4 Directions to protect town centre shops and offices.

Regulation 19 Consultation – Matters Raised

- General comments on housing delivery
- Providing greater development scale opportunities along Kenton Road (administrative boundary) to reflect developments being delivered within Brent along this road.
- Healthy & sustainable places
- Protected views – Old Redding & Football Ln
- Surface water management
- Parking
- Site Allocations

Outstanding Issues to be Agreed

No strategic matters remain outstanding, plan is considered to be in general conformity with the London Plan. Limited issues will be discussed through the course of the EiP of Harrow's Local Plan.

It is proposed that a Statement of Common Ground be entered into between Harrow and the four neighbouring London Boroughs. A statement endorsed by Barnet, Brent and Ealing has been included in the examination library.

An additional statement has been entered into with Brent and Ealing to reflect joint work in relation to burial space and this has been included in the examination library.

London Borough of Ealing

Pre-Regulation 18 Discussions

- LB Harrow provided a formal response to LB Ealing Regulation 18 Local Plan consultation dated 08 February 2023 with regard to 1) Housing land supply, 2) Greenbelt, 3) Metropolitan Open Land, 4) Development Sites in close proximity to the administrative boundary.
- Duty to Cooperate Meeting held 28 March 2023 to discuss the matters raised in relation to the LB Harrow response to the LB Ealing Regulation 18 Local Plan consultation (noted above). Context and rationale for Green Belt / MOL amendments outlined by Ealing, along with background and detail on the specific sites identified by Harrow.
- Subsequent LB Harrow response to Ealing Regulation 19 consultation (10 April 2024) noted changes to the proposed number of sites to be allocated and indicated no objection in principle to the designation of the three remaining sites listed above (subject to detailed planning consideration at application stage). The response also welcomed the revised approach to Green Belt and Metropolitan Open Land.

Regulation 18 Consultation

No representation received

Duty to Co-operate Meeting 16th May 2024 – Matters Discussed

- Updates provided on Local Plan preparation. LB Ealing noted consultation responses had been made by Harrow at R18 stage, specifically in relation to Green Belt and Tall Buildings.
- Ealing are progressing a CIL. Harrow are considering revising their CIL.
- LURA Discussion - Both authorities currently seeking to progress a plan under existing NPPF/ transitional arrangements.
- SoS direction to increase housing supply particularly in opportunity areas (e.g. Harrow & Wealdstone OA) noted but not clear if/how London Mayor will address these, potentially as part of LP review. LB Ealing Trying to take more of a balanced approach between housing and employment in Southall OA.
- LB Harrow are planning to meet London Plan housing targets 802p.a. with a focus on Harrow & Wealdstone OA, and less so on suburbs. Industrial requirements for Harrow quite modest. Ealing focus on spreading growth much more around settlements, taking advantage of CrossRail stations, with some regeneration of Northolt.
- Boundary development on Ealing side within Greenford/Northolt area, allocated sites at Westway Cross Retail Park, Former

<p>Greenwich School of Management, Mandeville Parkway. Noted that Northolt High School site no longer an allocation.</p> <ul style="list-style-type: none"> • Boundary development on Harrow side, no significant development. Some interest (via call for sites) on John Lyon School (Sudbury Playing Fields) for limited enabling development to facilitate improvement in grounds but unlikely to be taken forward (MOL). • Re town centre development, a Masterplan will be produced for Harrow TC. Opportunity area will continue to be focus of development and regeneration. Ealing Town Plans focussing improvements in each of five main settlements.
Regulation 19 Consultation
No representation received
Outstanding Cross-boundary strategic matters
<p>No strategic matters remain outstanding, plan is considered to be in general conformity with the London Plan. Limited issues will be discussed through the course of the EiP of Harrow's Local Plan.</p> <p>It is proposed that a Statement of Common Ground be entered into between Harrow and the four neighbouring London Boroughs. A statement endorsed by Barnet, Brent and Ealing has been included in the examination library.</p> <p>An additional statement has been entered into with Brent and Ealing to reflect joint work in relation to burial space and this has been included in the examination library.</p>

London Borough of Hillingdon

Pre-Regulation 18 Discussions
<ul style="list-style-type: none"> • N/A
Regulation 18 Consultation
No strategic issues raised at R18 stage.
Duty to Co-operate Meeting 10th April 2024 - Matters Discussed
<ul style="list-style-type: none"> • There is unmet future need for burial space across both authorities. Agreed to share the issue at West London Alliance meeting as potentially a sub-regional matter. • LURA Discussion regarding potential impacts on planning • Updates provided on Local Plan preparation, both authorities currently seeking to progress a plan under existing NPPF/ transitional arrangements • Government communication with Mayor of London on industrial land. Both boroughs are progressing under current policy framework but to continue to monitor the situation. Both boroughs would have a better understanding of cumulative impacts of development post Call for Sites process. • Neither borough consider any strategic impacts arising from town centres adjacent to administrative boundary, more known particularly after Harrow Call for Sites. Harrow seeking to progress Masterplan for Harrow Town Centre.

<ul style="list-style-type: none"> • Infrastructure development (health, transport, education, cemeteries) • Harrow looking at providing a new SEND school • Healthcare provision in Harrow will need looking at due some identified lack of provision. Harrow to share contacts with Hillingdon of GP groups/ practices that may seek to expand into Hillingdon. • LB Harrow raised an issue with contacting RAF Northolt, as this has an impact on development in the Harrow & Wealdstone Opportunity Area / Harrow Town Centre specifically. • Gypsy & traveller provision likely to be met by Harrow within the borough. Hillingdon has capacity on existing sites. No issues raised. • Evidence base preparation was updated. The Councils have worked together with LB Brent on SFRA1. There may be potential to procure SFRA 2 between the Councils. • LB Hillingdon has a number of Article 4 directions
Regulation 19 Consultation
No representation made.
Outstanding Cross-boundary strategic matters
<p>No strategic matters remain outstanding, plan is considered to be in general conformity with the London Plan. Limited issues will be discussed through the course of the EiP of Harrow's Local Plan.</p> <p>It is proposed that a Statement of Common Ground be entered into between Harrow and the four neighbouring London Boroughs. A draft statement has been circulated to Hillingdon, but no response received. A statement endorsed by Barnet, Brent and Ealing has been included in the examination library and will be updated should Hillingdon agree / sign.</p>

Neighbouring Boroughs in Hertfordshire

Hertsmere Borough Council

Pre-Regulation 18 Discussions
<ul style="list-style-type: none"> • LB Harrow provided a formal response to Hertsmere BC (10 February 2020) setting out at that time it was not in a position to assist Hertsmere BC in meeting its Objectively Assessed Need for housing. LB Harrow confirmed it was in the process of reviewing its own local plan in light of revised housing targets proposed as part of the London Plan update. <p>Duty to cooperate meeting 22 April 2021</p> <ul style="list-style-type: none"> • Discussions included local plan updates. • Housing: Hertsmere BC noted potential green belt release to meet housing targets. LB Harrow confirmed it intended to meet its housing targets without assistance from neighbouring authorities and noted previous correspondence to Hertsmere BC on this matter (noted above). • Infrastructure matters related to site specific application near administrative boundary, matters in relation to school places resulting from growth within Bushy (Hertsmere BC). LBH to share

GIS data regarding utilities and draft Infrastructure Delivery Plan & West London Strategic Infrastructure Delivery Plan when available.

- LBH seeking to commission Greenbelt assessment. Agreed to consult methodology with Hertsmere BC.
- Gypsy & Travellers: Hertsmere needing to allocated 25 pitches in Hertsmere. LBH do not need to provide extra pitches based on current evidence / London Plan.

Duty to Cooperate meeting; 10th October 2023

- Local Plan timeline update. LBH confirmed meeting London Plan housing targets. Hertsmere BC seeking to achieve Objectively Assessed Need.
- Hertsmere BC noted strong demand for Use Class B2/B8 including within Greenbelt.
- Infrastructure: Hertsmere BC has prepared a Sustainable Transport Strategy, LB Harrow to provide relevant Harrow contacts for potential cross-boundary transport issues. Hertsmere BC updating Infrastructure Delivery Plan for Reg 19, some pressures on school places. Harrow to pass matter onto Harrow Education Department, and provide Infrastructure Delivery Plan scoping report to Hertsmere BC.
- Technical Studies: Previously noted (as above) greenbelt review not being taken forward by Harrow by reason of meeting housing numbers in urban areas and national policy changes.
- Gypsy & Travellers: Hertsmere BC to review some of the proposed site allocations with intention to meet need. LB Harrow intended to meet its own need.
- Hertsmere BC and LB Harrow noted further studies and SPDs being progressed. LB Harrow to send Pan London Carbon Off-setting work to Hertsmere BC.

Regulation 18 Consultation – Matters Raised

- Housing need - Would like more clarity on how housing targets, affordable housing, and older people's needs will be met.
- Industrial land - Notes high demand for warehousing, and suggests ensuring the plan is fully meeting industrial and warehousing needs.
- Green Belt - Supports pragmatic redevelopment on Royal National Orthopaedic Hospital site. Seeks clarity on what development on the edge of green belt achieves.
- Areas of Special Character - Seek to acknowledge that this crosses the borough boundary.
- Gypsy & traveller accommodation - Expect Harrow to accommodate its needs based on updated GLA GTANA.

Duty to Co-operate Meeting 15th May 2024 – Matters Discussed

- LURA Discussion - Both authorities currently seeking to progress a plan under existing NPPF/ transitional arrangements
- Policy matters: Hertsmere noted it's not directly affected by the London Plan.
- LB Harrow confirmed it would meet the housing target set out in the London Plan, and that the requirement for new industrial land is modest.

- Query on Harrow’s reliance on small sites allowance and reliance on London SHLAA 2017. Harrow to update housing trajectory following call for sites exercise. Also noted that Harrow affordable housing policy to be tested as part of local plan viability study. LB Harrow noted the small sites target is set out in the London plan (Policy H2) and whole plan subject to viability testing.
- Hertsmere set out that new Reg 18 document does not plan to meet OAN as per previous version with resultant less incursion into the GB. Only around 75% to be met.
- Hertsmere note less office space need but looking like an increase in B8. Awaiting the updated South-West Herts Economic Study that will estimate the required employment land for the plan period.
- Potential strategic developments near borough boundary. Noted that more may be known following LB Harrow Call for Sites / Site Allocations.
- Town centre redevelopment: No specific issues identified. Masterplan for Harrow town centre to be progressed.
- Infrastructure: Harrow has concern regarding burial space capacity, looking to undertake some evidence base which could potentially be sub-regional. Hertsmere seeking to acquire more land around existing cemetery. Hertsmere shared contact details for potential further meetings between Harrow and Hertsmere on that matter.
- Development sites close to administrative boundary: Potential impacts on traffic onto M1/A41 through new development. Harrow noted details would be submitted with any development proposals.
- Royal National Orthopaedic Hospital (RNOH) near administrative boundary. Hertsmere to support a pragmatic approach for the site.
- Potential for joint evidence work regarding burial space.

Regulation 19 Consultation - Matters Raised

- Support of spatial vision, objectives, and strategy
- Acknowledge LB Harrow would meet housing need as per London Plan
- Accommodation for older people
- Local Economy
- Green Belt and Metropolitan Open Land
- Areas of Special Character
- Gypsy and Traveller provision

Outstanding Cross-boundary strategic matters

No strategic matters remain outstanding, plan is considered to be in general conformity with the London Plan. Limited issues will be discussed through the course of the EiP of Harrow’s Local Plan.

A Statement of Common Ground has been entered into between Harrow and Hertsmere and is included in the examination library.

Three Rivers District Council

Pre-Regulation 18 Discussions – multiple

24th March 2020 meeting strategic issues discussed.

- Update on Local Plan progress. Three Rivers - Housing and Urban Capacity studies being completed. Looking for a further 3,800+ homes to meet housing need, new Settlement Scoping Study looking at potential sites. Tender brief to be completed soon regarding potential new settlement areas identified.
- Stage 3 Greenbelt study completed. Strategic Growth Locations Study being undertaken with South West Herts Joint Strategic Plan.
- LB Harrow to start new local plan following NPPF update.
- Housing: Three Rivers DC noted letter to LB Harrow to consider accommodating any of Three Rivers DC housing and employment need. Verbally confirmed would not be able to and committed to sending formal letter. Three Rivers DC to send mapping of potential sites near administrative boundary to LB Harrow.
- Employment: Requirement for circa 7ha of land for industrial/warehouse use. Looking to allocate a site to accommodate. LB Harrow noted small need for industrial floorspace but difficult to deliver given poor strategic links. Permitted Development has resulted in significant office floorspace loss.
- Education: Three Rivers DC proposing to allocate a site for secondary school. LB Harrow noted new secondary school recently completed in north of the borough.
- Infrastructure: No cross boundary issues relating to health provision. Query relating to waste water provider to LB Harrow. Transport matters related to potential impact of propose sites specifically on M1/M25 and data of surveys to be shared and any mitigation measures required. LB Harrow noted Hatch End-Watford Junction overground share boundary and LB Harrow engaging with providers regarding capacity of station platforms. Green Infrastructure could be cross boundary so keep each other updated on this matter.

Duty to cooperate meeting 9th June 2020

- Update on Local Plan progress. Three Rivers noted new Settlement Scoping Study still ongoing, Urban Capacity Study almost complete, additional transport modelling being commissioned shortly. Three Rivers DC to inform LB Harrow outcomes near administrative boundary/surrounding areas and any changes to proposed allocations.
- LB Harrow noted new evidence base in relation to small sites being commissioned and noted indicative local plan timetable.
- Three Rivers DC noted response from LB Harrow regarding accommodating unmet housing need.
- Three Rivers DC to begin drafting Statement of Common Ground based on DtC dated 24 March 2020.

Response to Three Rivers letter dated 1st July 2021 setting out that LB Harrow is unable to assist with meeting unmet need within Three Rivers DC at this stage.

LB Harrow formal response to Three Rivers DC Regulation 18 consultation sent 9th March 2023 in relation to concerns around site allocations near the administrative boundary that resulted in the de-designation of Green Belt.

LB Harrow formal response to Three Rivers DC Regulation 18 consultation sent 24th November 2023 following Three Rivers DC persuading a lower growth option and reducing the impact on the Green Belt. Letter acknowledged matters raised by LB Harrow within the 9th March 2023 letter (noted above) has now been resolved.

Regulation 18 Consultation - Matters Raised

No significant issues identified.

Duty to Co-operate Meeting 10th April 2024 – Matters Discussed

- LURA Discussion on potential impacts on the planning landscape.
- Housing Numbers - Three Rivers are unlikely to meet full housing needs in their Local Plan Review due to green belt constraint. Harrow's LPR is expected to meet but not significantly exceed local housing targets set by the London Plan. SW Herts Local Plan may seek to address strategically.
- Border developments - In Harrow, it was noted that there were sites promoted in the green belt close to the border, but Harrow were not likely to undertake a green belt review as housing targets can be met within the urban area.
- Three Rivers have limited urban capacity, and therefore significant unmet need. Green Belt sites are therefore being promoted to them.
- Gypsy & traveller accommodation - Harrow expects to accommodate its needs based on updated GLA GTANA. Not considered to be a significant issue in Three Rivers.
- Burial Space - Potential for joint working to explore long-term needs. Three Rivers IDP currently being progressed with such matters seeking to be addressed.

Regulation 19 Consultation - Matters Raised

No representation made.

Outstanding Cross-boundary strategic matters

No strategic matters remain outstanding, plan is considered to be in general conformity with the London Plan. Limited issues will be discussed through the course of the EiP of Harrow's Local Plan.

A Statement of Common Ground has been entered into between Harrow and Three Rivers and is included in the examination library.

Hertfordshire County Council

- 3.15 Hertfordshire County Council and the South West Hertfordshire Joint Spatial Plan (accountable body) have also been notified. No responses have been received to either the Regulation 18 or 19 consultations.

Public Bodies

The Environment Agency

Regulation 18 Consultation - Matters Raised
<ul style="list-style-type: none"> • Green & Blue infrastructure • Open Spaces • Biodiversity • Sustainable design and retrofitting • Reducing flood risk • Developed V Greenfield Flood Zone 3B • Climate change • Floodplain compensation • Flood zones map • Sustainable drainage • Waterway management • Chalk stream buffer zones • Improving water efficiency • Water quality • Water management • Groundwater and land quality • SFRA 1 • SFRA 2 required • Surface Water Management Plan
Duty to Co-operate Meeting 11th December 2024 – Matters Discussed
<ul style="list-style-type: none"> • Need for sequential & exceptions test to be demonstrated • Groundwater contamination • Flood Risk Policy
Regulation 19 Consultation - Matters Discussed
<ul style="list-style-type: none"> • Groundwater contamination • Flood Risk Policy • Sequential & Exceptions Test
Outstanding Cross-boundary strategic matters
<p>A draft Statement of Common Ground has been prepared between LB Harrow and the Environment Agency covering suggested modifications to the Plan in regards flood risk and groundwater policy wording. At the point of submission of the draft plan, this statement was however yet to be finalised and will be submitted as an examination document when available.</p>

Historic England

Regulation 18 Consultation – Matters Raised
<ul style="list-style-type: none"> • Updating and improving the historic environment evidence base • Tall buildings • Integrating consideration of the historic environment into the borough profile • Policy requirements for the management of the urban environment • Aligning objectives and heritage policies • Implementing a more integrated approach to environmental management.
Regulation 19 Consultation - Matters Raised
<ul style="list-style-type: none"> • Consideration of the significance of the historic environment by identifying the factors that contribute to significance. • Management of tall buildings • Ensuring the urban environment is suitably managed • Historic Environment policies • Site allocations
Duty to Co-operate Meeting 8th January 2025
<ul style="list-style-type: none"> • Welcome changes made in response to the Regulation 18 representation (as above). • Meeting held to discuss site allocations that were not part of the Regulation 18 consultation, and to provide clarity in relation to their Regulation 19 response (as above). • Matters addressed and proposed modifications made where considered appropriate within the Regulation 22(1)(c) Statement.
Outstanding Cross-boundary strategic matters
<p>A SOCG has been prepared between LB Harrow and Historic England covering suggested modifications to the Plan in regards to the matters raised at Regulation 19 stage. At the point of submission of the draft plan, this statement was however yet to be finalised and will be submitted as an examination document when available.</p>

Transport for London

Regulation 18 Consultation – Matters raised
<ul style="list-style-type: none"> • Active travel • Public transport • Parking standards • Improving transport infrastructure
Regulation 19 Consultation – Matters raised
<ul style="list-style-type: none"> • Shifting journeys to sustainable modes • Healthy Streets Approach • Support for active travel and public transport • Re-provision of car parking • Investment in transport capacity
Duty to Co-operate Meeting – 20 December 2024
<ul style="list-style-type: none"> • Parking standards

Outstanding Cross-boundary strategic matters
A Statement of Common Ground has been prepared between LB Harrow and TfL covering proposed modifications to the Plan in regards to the matters raised at Regulation 19 stage. At the point of submission of the draft plan, this statement was however yet to be finalised and will be submitted as an examination document when available.

Natural England

Regulation 18 Consultation
Response received, no comments.
Regulation 19 Consultation
Response received, no comments.
Outstanding Cross-boundary strategic matters
None

Canal and River Trust

Regulation 18 Consultation
Response received, no comments.
Regulation 19 Consultation
Response received, no comments.
Outstanding Cross-boundary strategic matters
None

Civil Aviation Authority

Regulation 18 Consultation
No response received
Regulation 19 Consultation
No response received
Outstanding Cross-boundary strategic matters
None

Metropolitan Police Service

Regulation 18 Consultation – Matters Raised
<ul style="list-style-type: none"> • Planning obligations
Regulation 19 Consultation – Matters Raised
<ul style="list-style-type: none"> • Planning obligations
Outstanding Cross-boundary strategic matters
None

MoD (RAF Northolt)

Pre-Regulation 18 Discussions 2019 - 2022
<ul style="list-style-type: none"> • Airspace consultation (CAP 1616 process). LB Harrow attended information briefings (June 2019 & June 2022) and provided formal

responses in relation to proposed flight paths and potential impacts on LB Harrow.
Regulation 18 Consultation – Matters Raised
<ul style="list-style-type: none"> • Safeguarding airspace • Reducing risk from birdstrike
Regulation 19 Consultation
<ul style="list-style-type: none"> • Safeguarding airspace • Reducing risk from birdstrike
Outstanding Cross-boundary strategic matters
None

National Highways

Regulation 18 Consultation – Matters Raised
<ul style="list-style-type: none"> • Will consider impacts when allocations are identified.
Regulation 19 Consultation
<ul style="list-style-type: none"> • Location of development • Impact of development on the Strategic Road Network • Satisfied that no further evidence required to support the local plan in relation to potential impacts on the Strategic Road Network. • Content that any potential impacts caused by the nearest site allocation (Royal National Orthopaedic Hospital) to the Strategic Road Network can be addressed at planning application stage for that site.
Outstanding Cross-boundary strategic matters
None

Network Rail

Regulation 18 Consultation – Matters raised
No response received
Regulation 19 Consultation – Matters raised
No response received
Outstanding Cross-boundary strategic matters
None
Other
Request for comment from LB Harrow regarding the potential disposal of car park on Ellen Webb Drive (Adjacent to Harrow & Wealdstone Station)

Thames Water

Regulation 18 Consultation – Matters Raised
<ul style="list-style-type: none"> • Wastewater & water supply • Drainage and wastewater management plans
Regulation 19 Consultation – Matters Raised
<ul style="list-style-type: none"> • Water & sewerage infrastructure • Basement pumps • Drainage • Water efficiency

Outstanding Cross-boundary strategic matters
None

West London NHS/ HuDU

Regulation 18 Consultation – Matters raised
<ul style="list-style-type: none"> • Planning obligations • Accommodation for older people • Development Principals & Town Centre Hierarchy • Urban Greening, Landscapes and Trees • Parking • Health Impact Assessment • Site Allocations
Regulation 19 Consultation – Matters raised
<ul style="list-style-type: none"> • Floorspace for health facilities within site allocations
Outstanding Cross-boundary strategic matters
None

4. Statements of Common Ground

4.1 The following Statements of Common Ground have been agreed between Harrow Council and their partners or are underway.

Body	Status as at point of submission
London Boroughs of Barnet, Brent, Ealing and Hillingdon	Submitted with endorsement from Barnet, Brent and Ealing and included in Examination Library. No response from Hillingdon but this will be followed-up.
London Boroughs of Brent and Ealing (burial space)	Agreed and submitted / included in Examination Library.
Three Rivers	Agreed and submitted / included in Examination Library.
Hertsmere	Agreed and submitted / included in Examination Library.
Environment Agency	Drafted, pending feedback
Historic England	Drafted, feedback received, subject to further discussions
Transport for London	Drafted, feedback received, subject to further discussions

4.2 Statements of Common Ground that have been completed prior to submission have been added to the Examination Library. Outstanding ones will be added to the library once they have been agreed.