



Draft Harrow Local Plan 2021-2041

Consultation Statement, including The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulation 22 (1) (c) Statement

February 2025

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1. Introduction

1.1 The Council has been developing a new Local Plan to replace the current plan that was adopted in 2012 and 2013. This consultation statement sets out the process followed in relation to the two formal consultations (Regulation 18 and Regulation 19 consultations) undertaken during the preparation of the draft Harrow Local Plan 2021-2041. It has been prepared to meet the requirements of The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulation 22 (1) (c).

1.2 The legislation governing Regulation 18 and Regulation 19 consultation in the preparation of developing a new Local Plan is set out in The Town and Country Planning (Local Planning) (England) Regulations 2012.

Regulation 18 consultation

1.3 Between 26 February and 25 April 2024, the London Borough of Harrow ('the Council'), undertook a Regulation 18 Consultation 2024 to support the development of the new Harrow Local Plan 2021 – 2041 ('New Local Plan'). This initial statutory phase facilitates engagement from diverse stakeholders, spanning residents, developers, statutory bodies, and other interested parties, enabling them to contribute feedback on the evolving policies outlined in the draft document.

1.4 Sections 3 to 5 below outline who was consulted during the Regulation 18 consultation, how they were consulted, and a summary of the issues raised respectively.

Regulation 19 consultation

1.5 Between 4 November and 17 December 2024, the Council undertook a consultation of Harrow's New Local Plan - Proposed Submission (Regulation 19) version. This 'Regulation 19) consultation process built upon the earlier Regulation 18 consultation, focusing on the legal compliance and soundness of the draft Plan.

1.6 Sections 5 and 6 below document consultation arrangements (section 5) and the representations received and the Council's responses to these, including suggested modifications to the draft plan for consideration during the examination (section 6).

- 1.7 For both consultations, the Council adhered to all relevant legislative guidelines dictating the conduct of public consultations, as well as its own Statement of Community Involvement (SCI). The Council also considered the unique local context and embraced established best practices from similar consultations. The methodology underpinning this approach is detailed in subsequent sections of this document, offering transparency and clarity regarding the framework employed.

Regulation 22 (1) (c) Statement

- 1.8 The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulation 22 (1) (c) requires that a statement relating to consultation undertaken in preparing a draft Local Plan forms part of the submission of documents and information to the Secretary of State for examination.
- 1.9 This consultation statement meets the requirements of Regulation 22(1)(c) as follows:
- (i) which bodies and persons the local planning authority invited to make representations under regulation 18 – section 2;
 - (ii) how those bodies and persons were invited to make representations under regulation 18- section 3;
 - (iii) a summary of the main issues raised by the representations made pursuant to regulation 18 – section 4;
 - (iv) how any representations made pursuant to regulation 18 have been taken into account – section 4;
 - (v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations – section 6; and
 - (vi) if no representations were made in regulation 20, that no such representations were made – section 6.

2. 22(c)(i) Bodies and persons invited to make representations under Regulation 18

2.1 In total 1,120 individual notifications of the consultation were contacted. The majority of these are local residents who have registered to be notified on the Local Plan database. In addition to residents, the following groups were contacted:

- Local resident's groups
- Community groups
- Special interest groups
- Local businesses
- Internal consultees
- Local housing and residents associations
- Further and Higher education providers
- Religious groups

Statutory Consultees

2.2 57 statutory and general consultation bodies were contacted as part of the Regulation 18 consultation. Two rounds of emails were sent to these consultees with tailored follow ups.

1. Greater London Authority
2. Canal & River Trust
3. Coal Authority
4. The Crown Estate
5. Department for Business, Energy and Industrial Strategy
6. Environment Agency
7. Forestry Commission
8. The Gardens Trust
9. Health and Safety Executive
10. Homes England
11. National Highways
12. Transport for London
13. Historic England
14. London Borough of Barnet
15. London Borough of Brent
16. London Borough of Ealing
17. London Borough of Hillingdon
18. London Borough of Hounslow
19. Hertsmere Borough Council
20. Three Rivers Borough Council
21. Hertfordshire County Council
22. South West Hertfordshire Joint Spatial Plan
23. Watford Borough Council
24. The Marine Management Organisation
25. National Parks England
26. Natural England
27. National Grid
28. Office for Nuclear Regulation
29. UK Power Networks
30. National Health Service
31. National Rail

32. Office of Rail Regulation
33. Sport England
34. Theatres Trust
35. London Nature Partnership
36. Thames Water
37. Affinity Water
38. Thames Tideway
39. Joint Committee of National Amenity Societies
40. Campaign for the Protection of Rural England
41. National Air Traffic Services
42. Cadnet Gas
43. EDF Energy
44. Regulator of Social Housing
45. Department for Levelling Up, Housing and Communities
46. London Wildlife Trust
47. High Speed 2 Ltd
48. Fields in Trust
49. Planning Inspectorate
50. Open Spaces Society
51. 20th Century Society
52. SSE Energy
53. London Gypsies and Travellers
54. Metropolitan Police
55. Ministry of Defence
56. London Fire Brigade
57. Civil Aviation Authority

3. 22(c)(ii) How bodies and persons were invited to make representations under Regulation 18

- 3.1 The statutory requirements and Council’s Statement of Community Involvement (SCI)¹ set out the minimum requirements for advertising a consultation. The advertising undertaken for the Regulation 18 consultation was well in excess of these requirements as the widest possible range of views and opinions were sought.

Pre-Election Period

- 3.2 During the consultation that ran from 26 February and 25 April 2024 there was pre-election period for the election of Mayor of London and London Assembly Members which started on 18 March 2024. The Local Government Association define the pre-election period as “...the period of time immediately before elections or referendums when specific restrictions on communications activity are in place”. Advice was sought from the Councils retained Kings Counsel (KC) for the Local Plan who confirmed that this consultation was not in breach of the pre-election restrictions as no decisions would occur during that period.
- 3.3 It was decided to hold the main high-profile events, such as the ‘Street Events’ (detailed later in this document) ahead of the pre-election period commencing.

Consultation Branding and Illustration

- 3.4 Frequently Council consultations use corporate colours and imagery which can disengage residents which are used to seeing it in other Council-related contexts. It was thought important that the ‘look-and-feel’ of this consultation was separate and eye-catching, but retained the some element of council branding, in this instance the corporate purple which acts as a golden thread through all branding.
- 3.5 The design chosen as the hero image for the consultation features a colourful illustration of a number of recognisable Harrow landmarks, such as Katie’s Statue. It also reflects both the urban and more rural makeup of the Borough.

¹ <https://talk.harrow.gov.uk/23177/widgets/65711/documents/55002>

Harrow's New Local Plan 2021-2024

Initial Proposals (Regulation 18)



Image: Consultation Document Front Cover

Static advertising “toblerones”

3.6 Using the consultation branding, 2m high recyclable ‘toblerones’ were ordered and placed in key locations across the borough. These displays are 100% recyclable and will be used for the later Regulation 19 consultation with slight modifications. They were displayed at the following locations for the duration of the consultation period:

- Greenhill Library
- Kenton Library
- Pinner Library
- Roxeth Library
- Stanmore Library
- Wealdstone Library
- Harrow Council Hub
- Harrow Leisure Centre



Display in Wealdstone Library



Display in Roxeth Library

Newspaper Advertisements

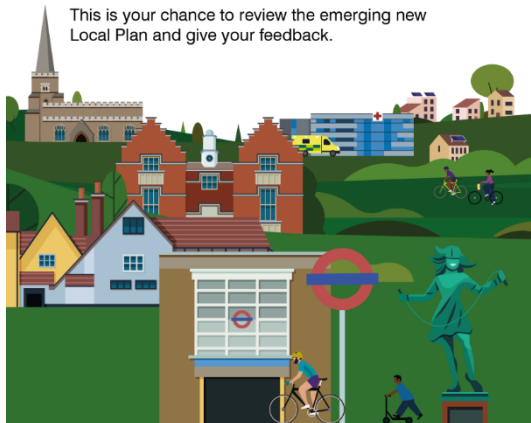
- 3.7 Full page advertisements were placed in the Harrow Times for two weeks (w/c 26th Feb and 3rd March 2024) alongside an online version on the internet version of the paper. The Harrow Times is the primary local newspaper and free of charge, it is also available in most libraries and other public locations. The internet version of the advertisement achieved 12,505 impressions in the first week and 12,501 in the second week.

Harrow's New Local Plan Consultation

The consultation is open between
26 February - 25 April

The London Borough of Harrow is developing a new Local Plan. The Local Plan is crucial to shaping our approach to housing needs, economic sustainability, health and inequality, and protecting the suburban character of our borough.

This is your chance to review the emerging new Local Plan and give your feedback.



Scan QR code for more info.



You can also attend one of our street events:

Location	Date	Time
Outside Rayners Lane Tube Station	Wed 28 Feb	9am - 1pm
Outside Wealdstone Library	Fri 1 Mar	11am - 3pm
Katie's Statue, Central Harrow	Sat 2 Mar	11am - 3pm
Broadway, Stanmore	Wed 6 Mar	12pm - 4pm
Outside South Harrow Library	Sat 9 Mar	11am - 3pm

Ways to get in touch:
Email us at LocalPlan@Harrow.gov.uk
Details can be found on our website
Visit us at the 'Conversation Café' every Tuesday during the consultation between 10am-3pm at St Peter's Church, Sumner Road, West Harrow, HA1 4BX.

You can find out more by visiting
www.harrow.gov.uk/NewLocalPlan



Copy of Newspaper Advert

Harrow People

- 3.8 Harrow People is a borough wide magazine produced by the Council and circulated to every household (approximately 100,000 copies). The magazine carried a full-page article about the consultation which was delivered to every household before 15th March 2024.

Unlocking the future

We've launched a consultation on our draft Local Plan, which will help to shape development in Harrow and show what kind of borough we want to live in. The Local Plan will steer Harrow into the 2040s, so it's important that residents have their say.

The plan will show developers what kind of buildings we want and where, and it will balance important considerations like economic growth and housing with looking after the environment.

It's important that the plan supports the needs of local people. We want to use it to protect Harrow's special character and heritage, to encourage more family homes and keep those we already have. The Local Plan will also incorporate our guidance on tall buildings, which sets out that Harrow wants to keep its predominantly low-rise suburban character, with more height permitted in the town centre and Wealdstone.

The eight-week consultation is now open. Share your views and help shape the Harrow of tomorrow.

Get involved

View the proposals, sign up for updates, and have your say at harrow.gov.uk/newlocalplan

Visit us at the **Conversation Café** every Tuesday, 10am-3pm at St Peters Church, Sumner Road, HA1 4BX

View the plan at the Harrow Hub (by appointment) or at Greenhill Library.

Email LocalPlan@harrow.gov.uk

Send us written comments to New Local Plan, Planning Policy Team, London Borough of Harrow, Forward Drive, Harrow, HA3 8FL



Copy of Article in Harrow People (page 17)

Stakeholder Emails

- 3.9 Emails were sent at regular intervals to the Local Plan stakeholder database. The database comprises of 205 email addresses from individuals that have signed up for further information regarding the Local Plan / Planning Policy consultations.

- 3.10 A database of an additional 90 stakeholders was developed to reach specific parts of the community such as religious and faith groups, educational establishments, businesses, residents groups etc.
- 3.11 A total of six rounds of emails were sent out to these databases during the consultation period.

Harrow's New Local Plan - Consultation closes 25 April



We have enjoyed meeting many of you over the past few weeks at our Street Events which were held across Harrow. Members of the Planning Policy team were on hand to listen to your feedback which will help to shape the Local Plan. We are keen to continue hearing your views. You can find details of how to provide feedback below. You can also visit our website <https://talk.harrow.gov.uk/harrowlocalplan>

The consultation closes 25 April 2024.

Answer our Quick Poll on Housing

The New Local Plan will commit to the delivery of 802 new homes a year. The focus for new housing will be in the Harrow and Wealdstone Opportunity Area as it the most accessible location in the borough for public transport, retail / commercial uses and infrastructure. The plan also places an emphasis on delivering family homes. Further details about the proposed housing policies can be found in [Chapter 4](#).

"Overall, do you agree with the New Local Plan's proposed approach to delivering Harrow's future housing needs?"

[Agree](#) [Somewhat Agree](#) [Netural](#) [Somehwat Disagree](#) [Disagree](#)

Screenshot of Stakeholder Email sent 4th April

Council E-Newsletters

- 3.12 Harrow Council issues a weekly e-newsletter which is distributed to around 130,000 email addresses. This newsletter regularly carried articles and information about the Local Plan consultation, and it was featured heavily in the opening week of the consultation.



1 March 2024

Help us to shape the future of Harrow from Leader of the Council, Cllr Paul Osborn



This week we launched a major consultation that will help to shape the Harrow of tomorrow. Our draft Local Plan, when adopted, will guide development into the 2040s.

The plan is an opportunity to show what kind of Borough we want to live in, what kind of buildings we want and where.

We want to use it to protect Harrow's character and heritage, encourage the building of more family homes and restrict inappropriate tall buildings. The consultation is now live online, and there are in-person events you can attend too - see further information below.

Local government finance has been in the news a lot lately. Like other councils, we've seen a significant increase in demand for services, including social care and housing, which are both very costly. We're all aware of rising prices in our daily lives, and the things that the council buys are affected in just the same way.

Thanks to careful financial planning, we've been able to deliver a balanced budget for the financial year ahead. This has allowed us to safeguard the services that you rightfully expect and invest in those areas where we've set our priorities. This means new money for services including road repairs, by-passing enforcement and street cleaning, where an extra £270,000 will help us to develop a more responsive, area-based service. You can find a detailed breakdown of our budget for 2024/25 [on the council's website](#).

It's the Covid19 Day of Reflection this weekend. As we reflect on this difficult time in our lives, we remember those we lost during the pandemic and the challenges that many people continue to face as a result of the virus.

Cllr Paul Osborn

A plan for Harrow's future



Copy of Council e-newsletter sent 1 March

Council Websites

- 3.13 A dedicated webpage was made available on the Council website where residents and stakeholders can learn more about the New Local Plan. This was supported by the My Harrow Talk platform.

Harrow website

- 3.14 From the start of the consultation to the end of April, the harrow.gov.uk/newlocalplan page had 855 views from 470 users.

New Local Plan Consultation

The London Borough of Harrow is in the process of producing a new Local Plan which will guide development in the borough between 2021-2041. We want to hear from people who live, work and have an interest in the borough. The Local Plan is crucial to shaping the council's approach to housing needs, economic sustainability, health and inequality, and protecting the suburban character of our Borough. We encourage everyone to have their say on the issues that matter most.



Read the draft [New Local Plan 2021-2041](#). A copy of this document is also available for public inspection at the Harrow Council Hub on Forward Drive by appointment. To make an appointment please email local.plan@harrow.gov.uk

Local Plan

Address: New Local Plan,
Planning Policy Team
London Borough of Harrow
Forward Drive
Harrow
HA3 8FL

Email: local.plan@harrow.gov.uk

Take part in the consultation

You will need to create an account on the consultation website before you can submit responses to the questions.

[Take part in the New Local Plan consultation >](#)

You can find further details and the evidence base on the [Harrow Local Plan Engagement Page](#)

Screenshot of Council website

My Harrow Talk Platform

- 3.15 During the course of the consultation there were 3,600 Site visits, with documents downloaded on 1,071 occasions. 45 queries/comments were made through the My Harrow Talk platform.

The New Harrow Local Plan 2021-2040

The London Borough of Harrow is producing a new Local Plan which will guide development in the borough between 2021-2041. We want to hear from people who live, work and have an interest in the borough. The Local Plan is crucial to shaping the council's approach to housing needs, the local economy, sustainability, health, inequality, and protecting the suburban character of our Borough. We encourage everyone to have their say on the issues that matter most.

This page has been set up to provide stakeholders with information on the new Harrow Local Plan including timelines, frequently asked questions, useful documents and relevant links. All consultation on the local plan will be run through this page, so please follow this project for updates.

What is a Local Plan?

Local Plans are documents that set out a vision and a framework for the future development of an area, addressing needs and opportunities in relation to housing, the economy, community facilities, infrastructure, the environment, climate change adaptation, and good design.

Why is the Harrow Local Plan important?

The policies within the Local Plan are used to guide development and decide planning applications. They also assist in the delivery of many Council services and priorities, such as the securing of affordable housing, achieving high quality development in the borough, managing the location, quantity, and quality of development, and promoting the vibrancy and vitality of our town centres.

All of these aspects help to fulfil the Council's priorities of putting residents first, and creating a borough that residents can be proud of.

The policies are set within the Local Plan for at least the next 5 years, so it is important to have your say on them, and help the council get it right.

Why does Harrow need a new Local Plan?

The current Local Plan was adopted in 2012 and 2013 and can be found [here](#).

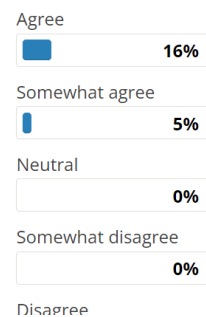
Screenshot of My Harrow Talks website

REGISTER for project updates

Quick Polls



Do you agree with the New Local Plan's proposed approach to delivering Harrow's future housing needs?



Stakeholder Meetings

3.16 Offering stakeholders in the community and beyond the opportunity to meet is important for any robust consultation. Officers met with:

- NHS HUDU
- Residents of Rosen House
- NHS Property
- Local Account (Carers) Group
- Harrow Community Partnership
- The Pinner Society
- Stanmore Society

Social Media

3.17 Harrow Council promoted the consultation on its social media profiles throughout. This included messaging about the location and timings of street events, advising people where to find further details and promoting the dates of the consultation.

London Borough of Harrow @harrow_council · Mar 8

We've spoken to lots of you at our street events about Harrow's New Draft Local Plan. We have two more events this week.

We're outside Harrow Weald Waitrose today (Fri 8th), 11am-3pm. Tomorrow (Sat 9th) we're outside Roxeth Library, 11am-3pm

Visit harrow.gov.uk/newlocalplan

**Harrow New Draft Local Plan
Public Consultation**

Street events w/c 4 March

Come find out more:

@Harrow Weald, outside Waitrose
Fri 8 March 11am-3pm

@South Harrow Library
Sat 9 March 11am-3pm

harrow.gov.uk/newlocalplan






2 1 1 449

London Borough of Harrow @harrow_council · Mar 9

We're at Roxeth Library until 3pm today. Come and talk to us about Harrow's New Draft Local Plan.

Find out more at harrow.gov.uk/newlocalplan

#HarrowLocalPlan



1 3 3 605

Screenshots of social media messaging

Consultation Leaflet

- 3.18 An A5 consultation leaflet was designed and printed for use at Street Events, to be located at key locations around the borough, and to be distributed in the community. A total of 4,500 leaflets were distributed.



Image: Front and rear side of consultation leaflet

Street Events

- 3.19 A series of six ‘Street Events’ were held at various locations around the borough between 28 February and 9 March. The Street Events represent one strand of a broader programme of engagement that is being undertaken to support community participation in the Regulation 18 Consultation on the New Local Plan.
- 3.20 The purpose of the events was to a) promote awareness of the New Local Plan in the community and b) to answer questions and receive feedback from the community.
- 3.21 Over the course of the six events there were interactions with hundreds of residents during which valuable feedback was received by the team. This feedback is summarised later in the document.
- 3.22 The events were scheduled to coincide with peak footfall times in each location. They were planned to include both weekdays and weekends, ensuring a broad outreach across the community in different parts of the borough.

Location	Date	Time	Approx Attendance*
Outside Rayners Lane Station	Wednesday 28th February	9am - 1pm	60
Outside Wealdstone Library	Friday 1st March	11am - 3pm	40
Katie's Statue, Central Harrow	Saturday 2nd March	11am - 3pm	90
Stanmore Broadway	Wednesday 6th March	12pm - 4pm	40
Outside Waitrose, Harrow Weald	Friday 8th March	11am-3pm	25

Location	Date	Time	Approx Attendance*
Outside South Harrow Library	Saturday 9th March	11am - 3pm	40

*These are approximate figures based on direct interaction with members of the public. In addition, during the Street Events over 3,000 leaflets promoting the consultation were handed out.



Event at Stanmore



Event at Rayners Lane

Conversation Café

3.23 The Conversation Café is a welcoming and safe drop-in session operated by the Council and well known in the community. It is for Harrow residents to meet face-to-face with staff from the Council and community partners. This offered those who wish to engage with us face-to-face, rather than digitally, another opportunity to ask questions and provide feedback.

3.24 Planning Policy Officers attended every session, which are held on Tuesdays, throughout the consultation period. Attendance at these events was promoted on all materials, including display boards, newspaper adverts and the website.

Translation and Language Considerations

3.25 The statutory requirements for consulting on a Local Plan mean that publication of very complex technical information and data cannot be avoided. It is acknowledged that this makes it harder for consultees to navigate, especially if they do not have any understanding of Planning.

3.26 To help overcome the difficulty associated with reviewing Local Plan documents, the best approach is to supplement the information with easy-to-read plain-English explanations, visual aids, and provide a method to translate documents into a variety of languages.

- 3.27 As part of the consultation a highly visual ‘Storymap’ with chapter summaries, supported by graphics was developed. The Storymap takes the consultee on a journey through the various chapters of the new Local Plan and seeks feedback at regular intervals through a series of questions and multiple-choice answers. There is also an ‘open text’ section on every section to allow the consultee to provide additional commentary. The consultee was not limited to a response in this method, and submissions via email, letter, etc were still welcome.
- 3.28 Local authorities must comply with the Equalities Act 2010, however it does not set out a legal duty to translate documents into foreign languages. However, the Council’s approach is to provide support in accessing documents in different languages where requested. The advent of modern technology such as Google Translate makes translation services easier than ever before. Not only are these services quick and highly accurate, they are cost effective and frequently used on large-scale consultations. Officers provided advice to any consultee requesting information on how to use this service.
- 3.29 The consultation website, as well as consultation emails, included information for how to request support to translate documents into foreign languages.

4. 22(c)(iii) Summary of the main issues raised by the representations made pursuant to Regulation 18 and 22(c)(iv) how the representations made pursuant to Regulation 18 were taken into account

4.1 The Council received:

- 136 questionnaires via the Urban Intelligence platform (of which 90 were returned as pdf versions)
- 116 other non-statutory responses
- 30 responses from Statutory Consultees
- 3 petitions (signed by a total of 246 individuals)
- 45 questions from the public on Engagement HQ
- Public participation in three ‘quick polls’
- Comments at six ‘Street Events’
- Comments at the Conversation Café

4.2 In total, 1,094 direct comments were made by a range of respondents including statutory bodies, local groups and individual members of the public.

Summary of issues raised in written responses

4.3 Over a thousand individual comments were submitted as part of the Regulation 18 consultation by a range of stakeholders including statutory bodies, neighbouring authorities, the development industry, local groups and members of the public.

4.4 All responses have been carefully considered by the Council. The key issues raised, together with the Council’s responses and resultant changes to the Local Plan (where appropriate) are set out in the table in Appendix 1 of the Regulation 18 Consultation Report (published separately). These are broken down in relation to the different parts/chapters of the Plan and appendices.

4.5 The main issues raised in the written responses echo to some extent those made in person at events/meetings reported above, conversation cafe and meetings and can be summarised as follows:

Consultation Strategy

- Several responses considered that the consultation process was not conducted properly as the communication strategies are not

comprehensive, or far-reaching, and many people are excluded, e.g. residents who do not use social media or e-mails.

- Residents should be sent letters explaining the local plan and the processes of providing comments. This has not been done. Instead, the council made announcements on Facebook and the online newsletter.

Growth and Spatial Strategy

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

Design and Heritage

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

Tall Buildings

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

Housing

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

Infrastructure

- Several public/non-statutory respondents stated that some forms of infrastructure in the borough were currently lacking and expressed the view

that additional housing would place pressure on an already burdened infrastructure system.

- There is a perceived deficit in some infrastructure forms in the Opportunity Area (health services and schools etc)

Green infrastructure and Climate Change

- Significant support shown toward the green infrastructure and climate change policies. There is a strong appetite to protect and enhance greenery, biodiversity, open spaces, and respond to the climate emergency.
- There is also support specifically around biodiversity net-gain (20%)

Transport and Movement

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

Employment

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

Street Event and Conversation Café Feedback

4.6 Overall, the feedback was a mix of concerns regarding infrastructure, affordability, the urban environment, specific local area issues and the effectiveness of development policies. There's a clear desire for improvements in infrastructure, affordability, cleanliness, and community services, along with support for environmental and social policies.

4.7 Infrastructure emerges as a significant issue, with concerns raised about the adequacy of support provided for new developments, including shortages of healthcare facilities, schools, and parking spaces. Additionally, housing affordability is a pressing concern, irrespective of whether it pertains to affordable housing or market-priced properties.

4.8 In Wealdstone, Rayners Lane and South Harrow specific attention was drawn to issues such as litter, limited shopping options/perceived decline in the quality of retail and high street offerings.

- 4.9 Concerns also extend to social and community aspects, with discussions revolving around the impacts of excessive development on traffic, crime rates, and the character of neighbourhoods. There is notable support for environmental initiatives and policies aimed at enhancing green spaces and the public realm.

Apathy and Scepticism:

- Lack of interest in planning due to perceived ineffectiveness of previous consultations in preventing applications being permitted.
- Scepticism about the ability of the new plan to address existing issues.
- Perception that the plan lacks significant changes and won't address Harrow's decline in attractiveness.

Infrastructure Deficiency:

- Concerns about inadequate infrastructure to support new developments, including healthcare facilities, schools, and parking.
- Lack of parking causing social issues and problems on the wider road network.
- Density of tall buildings exacerbate infrastructure issues.
- Need for additional public transport services.

Affordability Issues:

- A feeling that homes are unaffordable for locals, regardless of being affordable housing or market housing.
- Concerns about the lack of affordable housing in Harrow.
- Concerns about the affordability of new developments exacerbating the issue.

Urban Environment:

- Recent new build developments are perceived as too tall.
- Insufficient parking (as mentioned above).
- Negative impact of shop subdivisions in town centres.
- Litter, graffiti, and cleanliness issues in specific areas.
- Run-down centres, safety concerns, and desires for improved public realms and retail offerings.
- Lack of public bathrooms, particularly for people with children or those with disabilities.

Local Area Specific Concerns:

- Wealdstone: Food security, litter, limited shopping options, poor mix of shops.
- South Harrow: Departure of services, poor mix of shops, lack of pride, inadequate facilities like libraries and public toilets, protection of allotments.
- Rayners Lane: Decline in quality of shops, litter.

Development and Housing:

- Concerns about overdevelopment in the Opportunity Area contributing to traffic, crime, and loss of character.
- Apartments/flats perceived as unsuitable for families and of poor quality.
- Doubts about the viability and adequacy of infrastructure to support development.
- Need to consider provision, design and suitability of new buildings/family homes for people with disabilities, including mobility disabilities and ensure that wider spaces are also accessible and have suitable facilities such as disabled toilets and parking.

Environmental and Social Policies:

- Support for policies enhancing green spaces, biodiversity net gain, and net zero development.
- Concern about the affordability of net zero development policies.
- Desire for improvement in the cleanliness and safety of public spaces.
- Support for policies related to environmental standards, protection of the green belt and green spaces.

Other comments:

- Dislike for additional housing development expressed at street events.
- Positive responses to proposed opportunity areas, with some concerns about housing growth.
- Queries relating to plans for the Council's regeneration sites, particularly the former Civic centre.
- Several comments relating to specific planning applications or development sites.

Changes made between Regulation 18 and Regulation 19 Local Plan

4.10 The Council has carefully considered all responses made at the Regulation 18 stage and made a number of changes as a direct result. The key changes made included:

Chapter 1- Borough Profile, Spatial Vision, Strategic Objectives

- Borough Profile augmented to include greater reference to Harrow's heritage and water assets
- Changes to Vision, Strategy Objectives and Spatial Strategy to acknowledge importance of relevant assets and their management, commitment to addressing issues raised including the promotion of sustainable and cohesive communities.

Chapter 2- High Quality Growth

- New policy on Inclusive Design to ensure that the built environment can be used safely and with dignity by all regardless of disability, age, gender, sexuality, ethnicity, or economic circumstances

- New policy on Basement development to ensure that basement development adhere to relevant design standards
- New policy on Safety and Security and Resilience to Emergency to ensure that development and public realm is safe for residents and visitors.

Chapter 3- Historic Environment

- Amendments made across Chapter 3 to ensure consistency with heritage legislation and guidance including title change from Heritage to Historic Environment

Chapter 4- Housing

- An updated position of the capacity of potential sources of housing supply against the housing requirement/target; and details of all the proposed housing and other allocations, their capacity, planning/design consideration are included (see new Chapter 11)
- Amendments in relation to the provision of genuinely affordable housing clarify that different types of products can be provided (including low-cost homeownership) to address the needs of households on a range of incomes
- Amendments so that the draft Plan indicates Build to Rent developments may be appropriate in accessible locations like the District/ Major Town Centres, in addition to Opportunity Area
- Amendments clarify the supply of older person homes will be monitored against needs and an updated needs assessment may be undertaken (if necessary)
- Updated text notes there may be instances where proposals may not be able to provide two bed housing of an adequate size to accommodate four persons
- Amendments included for older person accommodation, require a higher proportion of wheelchair accessible dwellings for products aimed at those aged 65 + and requires multi-functional spaces used by healthcare/ care professionals to be 100% wheelchair accessible in care homes
- The proposed amendments to the Large-Scale Purpose Built Shared Living (LSPBSL) Policy include; (1) the location where LSPBSL will be supported is within boundary of the Harrow Wealdstone Opportunity Area, which was previously only within the Harrow Metropolitan and Wealdstone District Centres. (2) In relation to the 250m test for assessing the over concentration of LSPBSL, the detailed criteria for assessing appropriate alternated uses for a site has been deleted. (3) in relation to the need for LSPBSL provide public amenities such as restaurant, cafe or leisure facilities, the new text clarifies the suitability of the location will be considered for this
- The Gypsy and Traveller (G & T) policy is proposed to provide up to 12 additional traveller pitches between 2022-32, based on the Draft / unpublished GLA needs assessment. The additional G & T pitch needs are proposed to be accommodated on the existing Council owned site at Watlings Farm, through expansion of its boundary.

Chapter 5: Local Economy

- Further clarity has been provided within the supporting text to set out where and how new jobs may be supported, especially where outside of the Harrow & Wealdstone Opportunity Area in other centres and clustered around large employer institutions.

Chapter 6: Community Infrastructure

- Clarifying that the matter of Burial Space is an ongoing infrastructure consideration and that a Needs Assessment has been undertaken. Further work will be done to find sites for expansion of Burial Space in line with the needs of the community.
- Clarification around the policy requirements for Sport and Recreation development.
- Incorporation of requirements for NHS floorspace (i.e. GP surgeries) in a number of site allocations contained in Chapter 11.

Chapter 7: Green Infrastructure

- Amendments that further emphasise the consideration for the historic environment.
- Clarification around the potential redevelopment of the Royal National Orthopaedic Hospital (RNOH) site and its context as part of the Green Belt.
- Amendments made to clarify that ancillary facilities may be an acceptable use on open spaces and signposting to development guidance from statutory authorities.
- Amendment of the proposed 20% biodiversity net gain requirement from 20% to 15%. Amendments to strengthen the draft policy by better grounding it in relevant legislation and terminology.
- Prioritisation of kerb space for greening measures.
- Signposting to guidance regarding green walls and fire safety.

Chapter 8: Responding to the Climate and Nature Emergency

- Enhancement of consideration for the historic environment, particularly with regard to retrofit of buildings.
- Amendments made to highlight the challenge of water insecurity and additional requirements that must be met to ensure sustainable consumption and use of water in buildings.
- Clarification of expectations relating to foul and surface water flooding, and water contamination.

Chapter 9: Managing Waste and the Circular Economy

- Introducing a requirement that refuse bins in developments be compatible with Council refuse systems to ensure servicing from council collections.

Chapter 10: Movement

- Highlighted several significant transport infrastructure projects.

- Introduction of the Council’s EV planning objectives from the adopted EV Strategy.
- Clarification of parking requirements, particularly with respect to minimum requirements.

Chapter 11: Site Allocations

- New chapter arising as a result of the call-for-sites process run in parallel with the Regulation 18 consultation and site selection process. It includes all of the site allocations that will contribute to meeting the plan’s strategic/ spatial objectives. It includes site allocations for a range of development proposals including housing, industrial, commercial and Gypsies and Travellers. A series of templates are included for each site setting out the type and mix of development proposed, any planning constraints, design considerations and delivery timeframes.

4.11 A schedule of changes between the Regulation 18 and Regulation 19 versions of the draft Local Plan was published at Regulation 19.

5. Proposed Submission / Regulation 19 Consultation December 2024

- 5.1 Between 4 November and 17 December 2024, the London Borough of Harrow ('the Council') undertook a consultation of Harrow's New Local Plan - Proposed Submission (Regulation 19) version.
- 5.2 Building on the principles established during the Regulation 18 consultation, the Council recognised the critical importance of ensuring stakeholders were well-informed about the consultation process with ample notice. Providing clear information about the purpose, scope, and reach of the consultation was a key priority. For this stage, the manner in which feedback must be collected is explicitly defined in legislation, and the Council's approach was designed to meet these requirements while ensuring maximum accessibility for participants.
- 5.3 To achieve this, the Council employed a range of communication and advertising strategies to reach a broad audience. These included:
- **Council communication channels:** Regular updates and information were disseminated through the Council's official platforms, such as its website, newsletters, and social media.
 - **Newspaper advertisements:** Announcements were placed in local newspapers to reach residents who might not engage with digital channels.
 - **Direct updates to stakeholders:** Key stakeholders were notified directly to ensure they were aware of the consultation and could participate effectively.
 - **Advertising:** Posters at key locations in the Borough such as the libraries.
- 5.4 These efforts ensured that all relevant parties were informed about the consultation and understood how they could contribute their feedback. By combining legislative compliance with a proactive communication strategy, the Council sought to foster transparency, inclusivity, and robust public participation in shaping the local plan.

Branding

- 5.5 This consultation benefited from there being broad awareness that a new Local Plan is being developed because of our previous consultation. The consultation ‘brand’ (imagery, website addresses etc) has already been socialised and is recognisable in the community.

Harrow's New Local Plan 2021-2041

Proposed Submission (Regulation 19) version

November 2024



Image shows Local Plan front cover using distinctive design, used across all materials.

Newspaper Advertising

- 5.6 A public notice was placed in the Harrow Times (31 October 2024) ahead of the formal start of the consultation on 4 November 2024.

Public Notices



To advertise: 01923 216232 | email: wahmed@localiq.co.uk

Planning Notices | Traffic Notices | Legal Notices
Probate Notices | Other Notices | Church and Religious Notices
Tenders and Contracts | Goods Vehicle Operator Licences

ALCOHOL & Licensing

Notice Variation Application under the Licensing Act 2003
GOODFELLAS, 275 STATION ROAD, HARROW HA1 2EA
 NOTICE IS GIVEN THAT IAN HAZLET has applied to the London Borough of Harrow for a variation to the current premises licence to allow the following changes: Sale of Alcohol Sunday/Thursday 10:00-11:00 Friday-Saturday 10:00-02:00, Sale of Late-Night Refreshment Sunday/Thursday 10:00-01:00 Friday-Saturday 10:00-02:00. Anyone wishing to oppose the application must write to the Head of Community and Public Protection, London Borough of Harrow, Civic Centre PO Box 18, Station Road, Harrow, HA1 2UT (email licensing@harrow.gov.uk) by 15.11.2024 and give reasons for their opposition. It is an offence knowingly or recklessly to make a false statement in connection with an application the maximum fine for which a person is liable on summary conviction for making a false statement is a Level 5 fine on the standard scale. Copies of any objections will be sent to the applicant for their consideration and comment. Persons objecting to the grant of a licence may be invited to attend a public hearing.

GOODS Vehicle Licensing

Goods Vehicle Operator's Licence
 MVC Group (UK) Limited of 28 St Albans Lane, London NW11 7QE is applying for a licence to use Croydon House, East Lane, Wembley HA9 7PT as an operating centre for 4 goods vehicles and 4 trailers. Owners or occupiers of land (including buildings) near the operating centre who believe that their use or enjoyment of that land would be affected, should make written representations to the Traffic Commissioner at Quarry House, Quarry Hill, Leeds, LS2 7UE stating their reasons, within 21 days of this notice. Representations must at the same time send a copy of their representations to the applicant at the address given at the top of this notice. A Guide to Making Representations is available from the Traffic Commissioner's Office.

PROBATE & Trustee

ELEEN BURFORD (Deceased)
 Pursuant to the Trusts Act 1925 any person having a claim against or interest in the estate of the deceased, or of any of her beneficiaries (see para 10 of the will) should, in order to be able to present evidence in support of or to oppose a claim, file a claim form with the court by 15.11.2024. Any claimant who fails to do so will be barred from presenting evidence in support of or to oppose a claim.

Norman Nissim Elias (Deceased)
 Pursuant to the Trusts Act 1925 anyone having a claim against or an interest in the estate of the deceased, or of any of his beneficiaries (see para 10 of the will) should, in order to be able to present evidence in support of or to oppose a claim, file a claim form with the court by 15.11.2024. Any claimant who fails to do so will be barred from presenting evidence in support of or to oppose a claim.

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 To advertise your 'decorating' business contact the team today
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 LOCALIQ

PLANNING

Planning Notifications Thursday 31st October 2024 Town & Country Planning (Listed Building & Conservation Areas)
Reference: PL/2581/24
Location: 347-349 Station Road, Harrow, HA1 2AA
Proposal: External alterations to shopfront
Reason for Advertisement: Affecting Locally Listed Building
Application No: PL/2585/24
Site Address: 3 Warburton Close, Harrow Weald, Harrow, HA3 6SU
Development Description: Single storey front to side extension incorporating porch, single storey side to rear extension (Demolition of attached garage)
Site Notice Reason: Affecting a Conservation Area

Application No: PL/2687/24
Site Address: Shandon Poplar Close, Pinner, Harrow, HA5 3PZ
Development Description: Detached outbuilding at front for use as Office/Work, Canopy for Car Parking
Site Notice Reason: Affecting a Conservation Area
Application No: PL/2142/24
Site Address: Panoramas House Pinner Hill, Pinner, Harrow, HA5 3XT
Development Description: Two storey rear extension; Rooflights inside and rear elevations; Alterations to front porch, Patio at Rear
External alterations (Demolition of attached garage, Rear extension and front entrance canopy)
Site Notice Reason: Affecting a Conservation Area

Application No: PL/2590/24
Site Address: 9 Glasfryn Court, Brickfields, Harrow on the Hill, HA2 0NE
Development Description: Installation and replacement of French doors (like for like) to ground floor flat
Site Notice Reason: Affecting conservation Area
Application No: PL/2685/24
Site Address: 21 Roxeth Hill, Harrow On The Hill, Harrow, HA2 0JY
Development Description: Alterations to roof to form rear dormer
Removal and replacement of rooflight in front roofslope
Site Notice Reason: Affecting a Conservation Area

Reference: PL/2001/24
Location: 16 Ashbourne Avenue, South Harrow, Harrow, HA2 0LS
Proposal: Single storey rear extension, rear dormer
Reason for Advertisement: Affecting conservation area

Reference: PL/2508/24
Location: Kingsgate Sudbury Hill, Sudbury, Harrow, HA1 3NA
Proposal: Part conversion of garage into a habitable room; Reinstate the timber garage door at the front of the property and replace the side door with a window
Reason for Advertisement: Affecting conservation area
Application No: PL/2638/24
Site Address: 58 Whitchurch Gardens, Edgware, Harrow, HA8 6PD
Development Description: Two storey front bay window extension, Single storey rear extension; Alterations to roof to form rear dormer; Roof lights in front and side roof slopes, External alterations (Demolition of front porch and rear extension)
Site Notice Reason: Affecting a Conservation Area

REGULATION 19: TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012 (AS AMENDED) HARROW LOCAL PLAN 2021 – 2041: PROPOSED SUBMISSION VERSION

THE COUNCIL OF THE LONDON BOROUGH OF HARROW HEREBY GIVE NOTICE that they intend to undertake a consultation on the Harrow Local Plan 2021 – 2041. Proposed Submission Version in line with Regulation 19: Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The period for submission of representations begins at 12:00pm (midday) on Monday 4th November 2024 and ends at 11:59am on Tuesday 17th December 2024.

The proposed submission version, along with all supporting documents are being made available for public inspection to provide any individual, group or business the opportunity to make representations on the 'soundness' and legal compliance of the Harrow Local Plan 2021-2041: Proposed Submission Version, including on the duty to co-operate for the consideration of an independent Planning Inspector. A Statement of Representations Procedure will also be available for inspection. The Local Plan sets out the long-term development and investment strategy for the Borough over a twenty-one-year period (2021 – 2041). It forms part of the statutory Development Plan and is one of the council's most important documents. It is used to assess all planning applications across the borough. The Local Plan makes provision for new housing (giving priority to genuinely affordable housing), employment and other development needs including infrastructure to support growth and regeneration in an inclusive and sustainable way.

The Harrow Local Plan 2021-2024: Proposed submission document and all supporting documents including the Statement of Representations Procedure are available for download and inspection online by visiting www.harrow.gov.uk/newlocalplan or www.talk.harrow.gov.uk/harrowlocalplan

You can inspect physical copies of the submission documents (as outlined in the Statement of Representations Procedure) and the Statement of Representations Procedure at the London Borough of Harrow's principal office, London Borough of Harrow, Forward Drive, Harrow, HA3 8FL.

If you wish to inspect the submission documents at Harrow Council's principal office, please make an appointment by emailing localplan@harrow.gov.uk.

You can also inspect physical copies of the documents and the Statement of Representations Procedure at all Harrow Council libraries.

If you require the consultation documents in an alternative format, please contact se-sales@localiq.co.uk
Dated 25 October 2024

Viv Evans
 Chief Planning Officer
 Housing and Regeneration
 Director
 London Borough of Harrow,
 Forward Drive, Harrow, HA3 8FL



What are Public Notices and what is their purpose?

Public notices are adverts placed by local authorities to inform people of developments in their areas. They can cover a wide variety of topics that may impact your life. They can include planning applications and appeals, road closures or proposals by police or nightclubs hoping to change their opening hours or make other variations. The purpose of a public notice is to make sure anybody - either an individual or a group - with an interest has an opportunity to find out about and comment on the proposal before a decision is made on whether to allow it to go ahead.

Visit our dedicated website: publicnoticeportal.uk/harrow-times

Grow your business with a marketing partner with the intelligence and technology to get proven results.

The best move you'll make...

To advertise your Removals business contact the team today

t: 01268 533 933
 e: se-sales@localiq.co.uk



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localiq.co.uk

Public Notice published in the Harrow Times, 31 October 2024

5.7 Three additional full-page advertisements were published in *The Harrow Times* on 7th November, 21st November, and 5th December 2024. These print advertisements were complemented by a digital version featured on the online edition of the newspaper. As the leading local publication, *The Harrow Times* holds significant reach within the community. It is distributed free of charge, making it readily accessible in libraries, community centres, and other public spaces throughout the area.

5.8 The digital counterpart of the advertisement garnered approximately 12,505 impressions, reflecting its effectiveness in reaching a broad online audience. This combination of print and online exposure ensured widespread visibility across both traditional and digital platforms, maximising the campaign's impact within the target demographic.

Adverts published in the Harrow Times during the consultation period

November 7, 2024

Harrow's New Local Plan Consultation on Proposed Submission (Regulation 19) version

The consultation is open 4 November - 17 December 2024

The London Borough of Harrow is producing a new Local Plan which will guide development in the borough between 2021-2041. The Council is now consulting on the new Local Plan - Proposed Submission (Regulation 19) version.

The proposed Local Plan and supporting documents can be found on the Council's website at harrow.gov.uk/newlocalplan, along with details of how to make your representation.

You can also attend one of our drop-in events.

Location	Date	Time
Harrow Leisure Centre, Harlow Lane, Ossett Road, Harrow, HA1 1SD	Thurs 21 Nov	4pm - 7:30pm
Harrow Leisure Centre, Harlow Lane, Ossett Road, Harrow, HA1 1SD	Sat 23 Nov	10am - 1:30pm

You can also inspect physical copies of the documents at any of our libraries during opening hours or at the Harrow Council Hub (by appointment only).

Find out more about the New Local Plan by visiting harrow.gov.uk/newlocalplan



Advert, Harrow Times, 7 Nov 2024 Edition

November 21, 2024

Harrow's New Local Plan Consultation on Proposed Submission (Regulation 19) version

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Find out more about the New Local Plan by visiting harrow.gov.uk/newlocalplan



Advert, Harrow Times, 21 Nov 2024 Edition

December 5, 2024

Harrow's New Local Plan Consultation on Proposed Submission (Regulation 19) version

The consultation is open until 17 December

Find out more and give us your feedback at www.harrow.gov.uk/NewLocalPlan

The London Borough of Harrow is producing a new Local Plan which will guide development in the borough between 2021-2041. The Council is now consulting on the new Local Plan Proposed Submission (Regulation 19) version.


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You can also inspect physical copies of the documents at any of our libraries during opening hours or at the Harrow Council Hub (by appointment only).

Find out more about the New Local Plan by visiting harrow.gov.uk/newlocalplan



Advert, Harrow Times, 5 Dec 2024 Edition

Static Advertising

5.9 Posters advertising the consultation were displayed in all Harrow Council Libraries, and at the Harrow Council Hub. Copies of the Harrow's New Local Plan - Proposed Submission (Regulation 19) version were available for inspection at the following locations:

- Greenhill Library
- Kenton Library
- Pinner Library
- Roxeth Library
- Stanmore Library
- Wealdstone Library
- Harrow Council Hub
- Harrow Leisure Centre

Stakeholder Emails

- 5.10 Two email updates and corresponding updates on Engagement HQ, the Council's primary online engagement platform, were issued to subscribers. The first update was sent on 4th November, followed by the second on 12th December 2024. These updates were targeted at individuals who had specifically signed up to receive information about the new Local Plan.
- 5.11 The email database consists of 205 subscribers who expressed interest in receiving updates about the Local Plan. However, as these updates were delivered directly via email, detailed statistics on engagement are not available.
- 5.12 Engagement HQ updates, however, recorded notable open rates, with 71% of recipients engaging with the first update and 65% with the second. By 12th December, the recipient list for Engagement HQ updates had grown to 103 contacts.
- 5.13 In addition, a specialised stakeholder database containing 90 contacts was developed to facilitate targeted outreach to key groups within the community. This included religious and faith organisations, educational institutions, local businesses, residents' associations, and other community groups, ensuring a diverse range of voices and perspectives were included in the engagement process.

Gmail - Harrow's New Local Plan - Proposed Submission (Regulation 19) version, including Proposed Site Allocations Consultation Now Open

1 message

MyHarrow Talk <support@engagementhq.com>
Reply-To: MyHarrow.Talk@harrow.gov.uk
To: [REDACTED]

4 November 2024 at 11:47



**Harrow's New Local Plan 2021-2041
Proposed Submission (Regulation 19) version, including Proposed Site Allocations
Consultation Now Open**

The London Borough of Harrow has launched the second consultation on Harrow's Draft New Local Plan, known as 'Regulation 19 consultation'. In conjunction with this, the Council is also consulting on proposed Site Allocations; these identify land for various types of development such as housing and infrastructure.

The consultation period officially opens at **midday on Monday 4th November** and runs for **six-weeks, closing at 11:59 am on Tuesday 17th December 2024**.

Full details can be found in the Statement of Representations Procedure and Statement of Fact on our website.

Where can I find out more?

Read the draft [Draft New Local Plan 2021 - 2041](#). A hard copy of the Local Plan 2021-2041 - Proposed Submission version and supporting documents is also available for public inspection at the Harrow Council Hub, Forward Drive, Harrow, HA3 8FF by appointment. To make an appointment please email local.plan@harrow.gov.uk or call 020 8424 1660.

Gmail - Harrow's New Local Plan - Proposed Submission (Regulation 19) version, including Proposed Site Allocations Consultation Now Open

Alternatively, you can review the New Local Plan 2021-2041 Proposed Submission version and supporting documents at the following locations:

- Greenhill Library, Perceval Square, College Road, Harrow, HA1 1GX
- Kenton Library, 141 [Kenton Lane](#), Harrow, HA3 8UJ
- Pinner Library, 78 [Marsh Road](#), Pinner, HA5 5NQ
- Roxeth Library, Northolt Road, South Harrow, HA2 8EQ
- Stanmore Library, 8 [Stanmore Hill](#), Stanmore, HA7 3BQ
- Wealdstone Library, 38/40 [High Street](#), Wealdstone, HA3 7AE

Further details and the evidence base supporting the Local Plan can be found on the [Harrow Local Plan Engagement Page](#)

You can also find out more about what is being proposed by visiting our [website](#).

How can you have your say?

You can provide your feedback by completing the [online surveys](#) available via [The New Harrow Local Plan 2021-2041](#)

Email us a written representation at local.plan@harrow.gov.uk

Send us your **written comments** to New Local Plan, Planning Policy Team, London Borough of Harrow, Forward Drive, Harrow, HA3 8FL

Please follow the advice on the website on how to respond to Regulation 19 consultations to ensure any comments made reflect the requirements of the relevant legislation.

Talk to us

We will be hosting two in person events*:

- Thursday 21st November 2024, 4pm-7:30pm: Harrow Leisure Centre, Masefield Suite, Christchurch Avenue, Harrow, HA3 5BD
- Saturday 23rd November 2024, 10am-1:30pm: Harrow Leisure Centre, Masefield Suite, Christchurch Avenue, Harrow, HA3 5BD

*These are public events and you do not need to register to attend and you can drop in anytime.

Would you like to receive updates?

To continue receiving updates sign up to the local plan mailing list, [Register for MyHarrow Talk](#).

Harrow Planning Policy Team

local.plan@harrow.gov.uk

Get the latest Harrow news and events with our weekly [MyHarrow e-newsletter](#)

You're receiving this email because you are a registered participant on MyHarrow Talk.
Powered by EngagementHQ

Update 1 - 4th November 2024

Gmail - Harrow's New Local Plan 2021-2041 - Less than a week left to have your say

1 message

MyHarrow Talk <support@engagementhq.com>
Reply-To: MyHarrow.Talk@harrow.gov.uk
To: [REDACTED]

12 December 2024 at 08:18



Harrow's New Local Plan 2021-2041

Proposed Submission (Regulation 19) version, including Proposed Site Allocations

Consultation Open 4 November - 17 December 2024

- The consultation closes on **Tuesday 17 December at 11:59am** - You must submit your feedback by then
- You can learn more and provide your feedback by visiting www.harrow.gov.uk/NewLocalPlan
- There are multiple ways to provide your feedback. You can complete our online form, send us an email or a letter in the post

The London Borough of Harrow has launched the second consultation on Harrow's Draft New Local Plan, known as 'Regulation 19 consultation'. In conjunction with this, the Council is also consulting on proposed Site Allocations; these identify land for various types of development such as housing and infrastructure.

Full details can be found in the [Statement of Representations Procedure and Statement of Fact](#) on our website.

Where can I find out more?

Gmail - Harrow's New Local Plan 2021-2041 - Less than a week left to have your say

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Alternatively, you can review the New Local Plan 2021-2041 Proposed Submission version and supporting documents at the following locations:

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You can also find out more about what is being proposed by visiting our [website](#).

How can you have your say?

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- Email us a written representation at local.plan@harrow.gov.uk
- Send us your **written comments** to New Local Plan, Planning Policy Team, London Borough of Harrow, Forward Drive, Harrow, HA3 8FL

Please follow the advice on the website on how to respond to Regulation 19 consultations to ensure any comments made reflect the requirements of the relevant legislation.

Would you like to receive updates?

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Harrow Planning Policy Team

local.plan@harrow.gov.uk

Get the latest Harrow news and events with our weekly [MyHarrow e-newsletter](#)

You're receiving this email because you are a registered participant on MyHarrow Talk.
Powered by EngagementHQ

Update 2 - 12th December 2024

Public Exhibition

- 5.14 A public exhibition showcasing the proposal was held over two sessions at Harrow Leisure Centre. The first session took place on Thursday 21st November 2024, between 4:00 PM to 7:30 PM, and the second on Saturday 23rd November 2024, between 10:00 AM to 1:30 PM. These events were widely promoted via newspaper adverts, council communications channels and direct emails to stakeholders to ensure maximum community awareness and participation.
- 5.15 The exhibitions featured an array of display materials, including informative banners, copies of the Regulation 19 version of the Local Plan, and feedback forms for attendees to share their opinions. Members of the Planning Policy team were present during both sessions to answer questions, provide detailed explanations, and guide visitors through the information on display.
- 5.16 Attendance was modest, with three members of the public attending on 21st November and nine members on 23rd of November.



Image from the Public Exhibition



Image from the Public Exhibition



Image from the Public Exhibition

Council Communication Channels

- 5.17 The Council actively promoted the consultation using a variety of its communication channels, ensuring the widest possible reach. This included posts on Twitter, updates via WhatsApp, and announcements in the Council's e-newsletters.

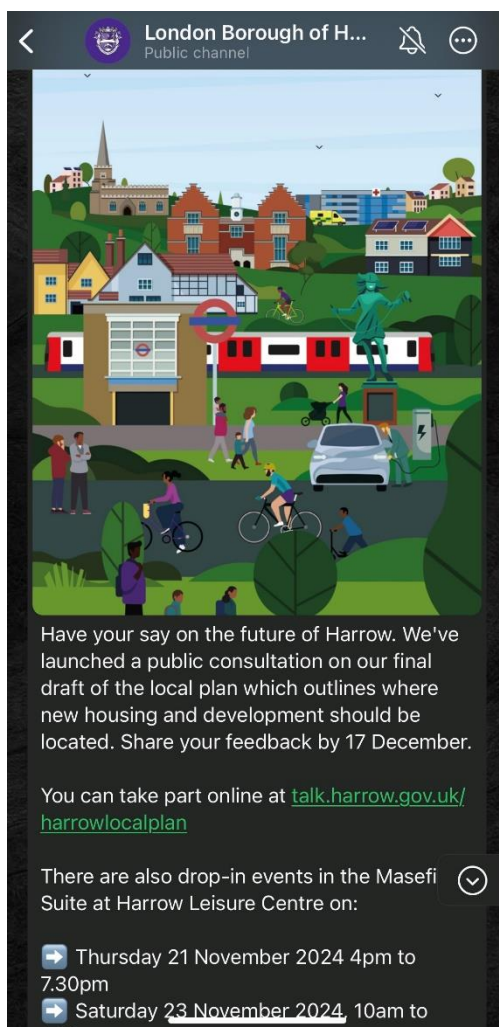


Image showing Harrow Council Whatsapp Channel Message

Council website

- 5.18 The consultation was given a dedicated page at **harrow.gov.uk/newlocalplan**. This page served as a central hub for information about the Local Plan, with data showing significant engagement from the public over the course of the consultation period. Key metrics include:
- **Total Views:** The page was viewed 866 times, accounting for both new and repeat visits.
 - **Active Users:** A total of 376 unique visitors engaged with the page.

- **Average Engagement Time:** Visitors spent an average of 1 minute and 7 seconds reading the content, indicating a reasonable level of interest in the information provided.

5.19 Through the use of diverse communication channels and the Council's website, the consultation campaign successfully reached and engaged a wide audience.

The screenshot displays the 'New Local Plan Consultation' page on the London Borough of Harrow website. The page includes a header with the council logo, navigation links, and a 'Log In / Register' button. The main content area features a title 'New Local Plan Consultation' followed by an introductory paragraph and a 'Local Plan' sidebar. A prominent green call-to-action button reads 'Take part in the consultation'. Below this, there is a section titled 'How can you have your say?' with a list of activities and a table of consultation events. The table lists events such as 'Outside Barnes Lane Station' and 'Outside Washburns Library' with their respective dates and times. Further down, the page contains sections for 'Timetable', 'Would you like to receive updates?', 'Formal Call for Sites', 'Evidence Base', 'Privacy Notice', and 'Further information'. At the bottom, there is a feedback form asking 'Did you find this page useful?' and a footer with contact information and a copyright notice.

Location	Date	Time
Outside Barnes Lane Station	Wednesday 28th February	10am - 1pm
Outside Washburns Library	Friday 1st March	10am - 3pm
Kilnari Station, Central Harrow	Saturday 2nd March	10am - 3pm
Stamrose Broadway	Wednesday 6th March	10pm - 1pm
Harrow Weald, Outside Washburns	Friday 8th March	10am - 3pm
Outside South Harrow Library	Saturday 9th March	10am - 3pm

Screenshot of harrow.gov.uk/NewLocalPlan

My Harrow Talk Platform (Engagement HQ)

- **Total Site Visits:** The Local Plan consultation generated 3,756 visits to the site.
- **Downloads of the Local Plan (Regulation 19 version):** The document was downloaded 946 times, underscoring a high level of interest and proactive engagement from users who sought in-depth information.



Home / Planning / The New Harrow Local Plan 2021-2041

The New Harrow Local Plan 2021-2041



The New Harrow Local Plan 2021-2041

Consultation on Proposed Submission (Regulation
19) version

The consultation is open 4 November - 17
December 2024

The London Borough of Harrow is producing a new Local Plan which will guide development in the borough between 2021-2041. The Council is now consulting on the [new Local Plan - Proposed Submission \(Regulation 19\) version](#). The consultation

Screenshot of My Harrow Talks – New Local Plan

How feedback was obtained

- 5.20 The process for collecting feedback during the Regulation 19 stage is clearly defined by legislation. To ensure compliance, the Planning Inspectorate provides a ‘model representation form,’ which the Council adopted in accordance with these guidelines. The official form can be accessed here: [Model Representation Form for Local Plans](#). In addition to meeting the statutory requirements, the Council went further by using a digital feedback form to enhance accessibility and convenience for respondents. Comprehensive guidance on how to submit feedback was also made available to the public.
- 5.21 Respondents were provided with multiple avenues to submit their feedback, ensuring flexibility and inclusivity. These options included:
- **Completing the model feedback form:** This form was offered in various formats, including Word, PDF, and print. Respondents could return the completed form to the Council via post, email, or in person.
 - **Using the online feedback form:** A digital version of the form was made available for convenient online submission.
 - **Submitting a representation via email:** Respondents could send their feedback directly to the Council’s designated email address.
 - **Submitting a representation via post:** Physical copies of representations were also accepted through the mail.
- 5.22 To facilitate transparency and accessibility, the Council published a ‘Statement of Representation Procedure and Statement of Facts,’ which was available for public inspection both online and in person. Copies of the *Harrow’s New Local Plan - Proposed Submission (Regulation 19) version*, along with all supporting evidence and documents, the *Statement of Representation Procedure and Statement of Facts*, and the model feedback form, were made accessible at several locations for inspection. These included:
- Greenhill Library
 - Kenton Library
 - Pinner Library
 - Roxeth Library
 - Stanmore Library
 - Wealdstone Library
 - Harrow Council Hub (viewable by appointment)

5.23 Through these measures, the Council ensured that all relevant materials were readily available and that the public had multiple accessible and convenient methods to participate in the feedback process. These efforts underscore the Council's commitment to exceeding statutory requirements and fostering robust community engagement in shaping the new Local Plan.

6. 22(c)(v) Number and summary of the main issues raised in representations made pursuant to Regulation 20

- 6.1 In total there were 144 responses to the Local Plan Publication. This included 23 landowner/ promoter/ developers, 8 interest / stakeholder groups (including resident’s associations and lobby organisations), 18 statutory consultation bodies, and 95 individuals.
- 6.2 A number of individuals have submitted a substantively identical response to the consultation, the issues raised in which have been summarised as “Standard Response 1” in the tables below.
- 6.3 A separate consultation in relation to the Kenton East Controlled Parking Zone was held at the same time as the Publication of the Local Plan. Some representations to the Local Plan specifically or tacitly relate to the CPZ. Often these responses have been directed to Policy M2 (parking). The Council considers that these representations have been duly made, and we have included them in this document.

Summary of the main issues raised

- 6.4 Outlined below is a summary of the representations received, group by chapter / themes. It is intended to be a summary of the detailed assessment of representations, attached as a separate document (circa 200 pages).

Spatial Strategy/ High Quality Growth

- (a) Developers noted the impending introduction of a new NPPF, and the likelihood that this will increase housing targets for new Local Plans. The consequence of this could be that a rapid review of the Plan may be required, with increased housing numbers.
- We note this, but it is our view that we are proceeding in accordance with the plan making regulations in order to have an up-to-date Local Plan and that any revised housing targets for Harrow will be set by any replacement London Plan.
- (b) Residents within and adjacent to the Opportunity Area object to the spatial strategy of directing a significant proportion of growth into the Opportunity Area rather than spreading it more evenly across the borough. Concern was raised in relation to the concentration of, and density/ height of new development in close proximity to where they live.

- (c) Some neighbouring London Boroughs and land promoters query the lack of ambition for growth outside the Opportunity Area, noting that there are town centres and public transport corridors that may be suitable for intensification.
 - The Council has made a policy choice to focus development in the Opportunity Area, and it is noted that this is in general conformity with the London Plan, as confirmed by the GLA in their consultation response.
- (d) Local residents also voiced concerns about the impact that development within the OA will have on surrounding areas, including the strain on infrastructure, including community infrastructure, utilities, and transport.
 - The local plan is supported by an Infrastructure Delivery Plan to guide infrastructure which supports new development.

Historic Environment

- (e) The principal representation to this chapter was received from Historic England, much of which related to the clarity of terminology, impacts associated with tall buildings, and queries in relation to a selection of site allocations where they are in proximity to heritage assets.
 - Additional wording is proposed bolstering Policy HE1
 - A Statement of Common Ground is being sought with Historic England to agree the amended text.

Meeting Housing Needs

- (f) Site promoters seeking greater development in suburban and green belt areas suggest that the Plan will deliver an insufficient level of family and affordable housing, when compared to local needs, as it is highly reliant on previously developed land, small sites, and flatted development.
 - The Local Plan policies require the provision of affordable and family sized housing within all developments, including on flatted, and previously-developed sites. Design-led site capacity studies assume a policy compliant mix of dwelling sizes.
 - This is supported by the Local Plan Viability Assessment which demonstrates that the typologies of sites in the Plan can deliver a policy-compliant mix of sizes and tenures of new homes.
- (g) Land promoters expressed concern that the Plan is highly reliant on the small sites windfall allowance to address future housing need, and consider that housing targets may not be met because of this.
 - The Local Plan approach to small sites is in-line with the London Plan and the Council's own evidence base.

- (h) Site promoters are claiming that the Local Plan target for specialised older person accommodation homes of 98 p.a. is too low, compared with the London Plan benchmark for Harrow of 165 p.a. They are also suggesting that the Plan's Site Allocations will fail to address local needs.
- The 98 units p.a. figure is based on evidence from the Council's Local Housing Needs Assessment (LHNA). This approach is in line with London Plan Policy H13, which sets a baseline, but indicates local evidence should take precedence.
 - Site Allocations are one source of supply, other sites will contribute to meeting need.
- (i) Many site promoters are seeking greater flexibility to help them deliver Large Scale Purpose Built Shared Living (LSPBSL) ('co-living') schemes on allocated sites. They contend that there is a significant need for this type of product.
- (j) Developers consider that LSPBSL should not be restricted to the Opportunity Area. They suggest that other locations such as around train/tube stations and District centres should be considered appropriate.
- (k) Additionally the test for the over concentration of LSPBSL is unjustified, as there is no evidence to indicate these are adversely affecting the delivery of conventional housing, and it unclear why this approach is not applied to similar uses like Build to Rent and Purpose Built Student Accommodation.
- (l) Developers contest that LSPBSL schemes should not be required to demonstrate affordability, as the price includes all costs to renters, and there are no comparable products.
- Our evidence indicates no specific need for LSPBSL, compared with significant need to increase delivery of self-contained housing, particularly family sized and affordable housing.
 - In land terms, sites that are delivered as LSPBSL will not be delivered as housing that meets an identified need, and will therefore adversely affect delivery of new homes that meet local housing needs.
 - Build to Rent and Student Accommodation are required to demonstrate that they meet a local need. There is evidence that supports these products, unlike for LSPBSL.
- (m) The GLA note that there will be updated London-wide evidence updating the position on need for Gypsy & Traveller accommodation.
- The Watling Site Farm site allocation meets local need, based on the evidence available at the time of Publication/ Submission of the Plan.

Local Economy

- (n) Residents question how 1,000 additional jobs will be delivered in the borough.

- We have a sufficiency of floorspace in the form of mixed use town centre sites, the intensification of industrial land, and the take-up of vacant units.
- (o) The Mayor of London supports the limited changes to industrial land designations that allow greater flexibility for mixed use regeneration on sites such as Kodak.

Social and Community Infrastructure

- (p) It is acknowledged that there is a cross-boundary emerging shortage of burial space in West London.
 - The Council is working with neighbouring London boroughs to identify options to resolve this matter. The Council intends to enter into a Statement of Common Ground with Ealing and Hillingdon in this regard.
- (q) The development industry recommended that it is clarified that development should contribute to meeting the infrastructure needs of new development, but that it is not able, or required, to resolve historic shortfalls in infrastructure provision.
- (r) Developers expressed concern that development could be “held up” if infrastructure does not come forward in a timely manner.
 - The Council has clarified that contributions towards new social infrastructure will be required where additional needs are generated.
- (s) Sport England does not consider that wording in the Plan accords sufficiently with the NPPF regarding protecting against loss of sports and leisure uses.
 - Modifications have been proposed to bring the Plan text more closely into line with the NPPF

Green Infrastructure

- (t) The Mayor of London recommends that the Plan’s Green Belt site allocations should refer to appropriate national policy tests for new development, including the need to demonstrate very special circumstances
 - A requirement for proposals to demonstrate very special circumstances at the planning application stage has been introduced into the Green Belt Site Allocations.
 - In relation to the Green Belt, clarification has also been made to make clear that this Plan was prepared under the provisions of the December 2023 version of the NPPF.
- (u) Historic England sought reference to the heritage value of Green Infrastructure in the Plan.

- We have made this clarification. We are also proposing to enter into a Statement of Common Ground with Historic England on this and other matters.
- (v) There is concern from the development industry that the proposed 15% Biodiversity Net Gain uplift within new developments is not viable.
 - Our Viability study demonstrates that this is viable alongside other policy requirements of the Plan.

Climate change & the Nature Emergency

- (w) The Environment Agency did not consider our approach to managing flood risk, or groundwater contamination to be sound, and provided alternative wording.
 - We are clarifying the approach with the EA seeking to enter into a Statement of Common Ground with the EA, which will propose amendments to our wording to bring it in to line with their expectations and agreed position.

Managing Waste

- (x) No significant issues.

Transport

- (y) TfL is concerned that there is wording that supports car parking above their maximum standards, as set out in the London Plan.
 - We have clarified that the parking standards in the London Plan will be respected. A Statement of Common Ground is being progressed in regards this matter.
- (z) A significant number of responses conflated the East Kenton CPZ consultation with this consultation.
 - These responses were recorded, and passed on to the parking team.

Site Allocations

- (aa) Developers and site promoters consistently challenged the capacity of site allocations, arguing they should be increased. Linked to this, developers also argue that there could be more areas suitable for taller buildings.
 - We are content that the site selection methodology and taller buildings evidence documents are robust, and the Policies and site allocations / capacities are sound.

- (bb) Developers are seeking to increase the number of locations suitable for co-living to include District centres and sites close to train/ tube stations.
 - We do not believe there is evidence that supports a policy position that supports co-living development above other types of housing, and we are content that our evidence identifies appropriate envelopes for tall/ taller buildings.
- (cc) The promoter of the Marsh Lane gas holder (Site 19) site continues to promote the site as a new supermarket.
 - We do not believe that a supermarket is appropriate in this out-of-centre location, and as such we will retain the residential allocation in the Plan.
- (dd) The promoter of the Travellers Rest site is seeking to remove the pub and hotel uses from the allocation.
 - We agree that there is not a requirement to replace the hotel use, but there does need to be a replacement pub.
- (ee) Sites not currently included in the Plan were promoted, but these are generally repetitious of sites discarded earlier in the preparation of the Plan, mainly due to their location on Metropolitan Open Land or within the Green Belt.

6.5 The main issues raised, and the Council's response are set out in the tables below. These are ordered as per the Publication version of Local Plan.

Spatial Strategy

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Carter Jonas for Barratt London	The spatial strategy for the Borough confirms that the Council will deliver minimum 16,040 homes (net) for the plan period to 2041. Specifically, the Harrow & Wealdstone Opportunity Area will deliver 8,750 additional new homes (an uplift from 7,500 new homes in the Regulation 18 Consultation version Local Plan) and 1,000 additional jobs. Eastman Village is an established redevelopment site which will continue to deliver housing alongside non-residential uses. It is located within the Harrow & Wealdstone Opportunity Area where the Council is seeking to deliver almost half of its housing need for the plan period. It is considered that the Council's approach to focussing development within the Opportunity Area is one which will ensure the most sustainable development patterns for the Borough which take advantage of brownfield land located within proximity to existing infrastructure, whilst respecting the more suburban character of other areas of the Borough. We continue to strongly agree with the Council's spatial strategy as set out in the Local Plan.	Support noted. No proposed modifications
Places for London	Our general comments from Reg 18 stand and we note that the London Plan review is imminent and so there are likely to be revised housing targets emerging. We also note that, last week, the national housing target was increased from 300,000 to 370,000 homes per year, and that the target for London was increased to 88,000 homes per year (up from 52,000 in the London Plan) using the 'revised standard method'. The borough may have to revise its housing target upwards, likely quite substantially, depending on how quickly the draft Plan progresses. However, until the Mayor establishes housing targets for boroughs, rolling forward the current housing target for Harrow is noted.	Noted. The Council has prepared the Plan in accordance with NPPF 2023 and The London Plan (2021). No proposed modifications
Home Builders Federation	We welcome this statement within the spatial strategy: <i>Appropriate development will occur on small, brownfield sites in sustainable locations close to town centres, and train and underground stations.</i> No doubt, how this will be implemented in practice, we will consider in due course, through these representations. However, a reference to the physical distance from town centres and train stations might be helpful, reflecting the aim of the London Plan.	Noted. No proposed modifications
Historic England	We welcome that our suggested text has been included here. However, we should have been clearer in suggesting that the proposed text replaced the first sentence. As edited, it reads as duplicate text: <i>'Harrow's identified heritage assets and historic environment will continue to be valued, conserved, enhanced and celebrated. Areas of special character and architectural significance will be protected. The significance of Harrow's historic environment and its constituent heritage assets, will continue to be valued, conserved, enhanced and celebrated.'</i> Instead, we intended: <i>'The significance of Harrow's historic environment and its constituent heritage assets, will continue to be valued, conserved, enhanced and celebrated. Specific conservation and enhancement measures identified within Harrow's Conservation Area Appraisals and Management Strategies (CAAMS) and SPDs will be carried out as opportunities arise.'</i>	Noted and change agreed. Proposed Modification Amend Spatial Vision, 12th paragraph by deleting the first two sentences i.e. Harrow's identified heritage assets and historic environment will continue to be valued, conserved, enhanced and celebrated. Areas of special character and architectural significance will be protected.

Strategic Policy 1 – High Quality Growth

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Arzu Galian	High quality growth should take into consideration the higher than average car ownership in Harrow (as mentioned in the Harrow Local Plan - Proposed Submission (Reg 19) version and ensure the growth is supported by infrastructure and phased over a long period (5 years or more) to accommodate the needs of the increased population. The roads are already jammed with traffic, even before the Kodak building site is completed. The extra population will cause traffic jams, noise and pollution, as well as creating dangerous roads for cyclists like myself.	Development has been directed to the areas with higher levels of public transport access, which will maximise the opportunities for new residents to travel by modes other than private car. Additionally, by locating development in and around the town centre, opportunities for residents to walk to local services are maximised. A transport assessment of the Kodak re-development has been carried out, and mitigations identified that will manage the impacts on the transport network, along with

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>improvements to sustainable transport options, such as buses, and walking and cycling networks.</p> <p>No proposed modifications</p>
Mayor of London	<p>The borough is home to one Opportunity Area (OA), namely, Harrow and Wealdstone OA with an indicative capacity for 5,000 homes and 1,000 jobs as set out in Table 2.1 of the LP2021. This is reflected in the draft Plan and is noted and welcomed.</p>	<p>Noted.</p> <p>No proposed modifications</p>
Standard Response 1	<p>Strategic Policy 01: High Quality Growth Policy GR3A: Inclusive Design Policy GR2: Inclusive Neighbourhoods Policy GR1: Achieving a High Standard of Development</p> <p>Are the Policies Sound: No</p> <p>The growth allocated to the Opportunity Area is completely disproportionate and illogical, placing an undue burden on it. Since its inception in 2013, it has already had over 3,500 units. The area is relatively small, comprising 69 hectares in a total of 5,047 hectares in the borough. The notional capacity of the Opportunity Area has been repeatedly revised, from an initial 2,900 units to the current 9,352, accounting for 58.3% of the borough's 16,040 housing target. Yet this area represents only 1.3% of the borough's size, making the situation markedly unfair to those residents living in this area compared with those in the rest of the borough</p> <p>According to the London Plan 2021, the Opportunity Area has a capacity of 5,000 homes and 1000 jobs. By 2029, this number will have been reached, and the London Plan 2021 does not call for an additional 4352 units. There is no rationale whatsoever for increasing housing in the Opportunity Area. The remaining sites should be developed into actually useful family housing that properly aligns with the character of the area and maintains the low-rise nature of Station Road, which has already been severely blighted by the Safari development It is family accommodation that is in dire need.</p> <p>If the current trajectory continues, the Opportunity Area will have produced nearly 13,000 homes by the end of the Plan period. The area is already overdeveloped, and further development would negatively affect the quality of life for both existing and new residents. Adding more flats will exacerbate the present shortages. Past regeneration efforts have repeatedly increased inequality within the borough, with those living in or near the Opportunity Areas experiencing the most significant decline in living standards due to the strain on existing infrastructure. For example, power cuts have become more frequent in neighbourhoods in and adjacent to the Opportunity Area. Despite 11 years of so-called 'regeneration,' the Opportunity Area is rundown, dirty, and unappealing, showing that the regeneration strategy isn't working. Attempts by residents in this area to request the Council to repair deteriorated roads and pavements are just brushed aside.</p> <p>The Harrow and Wealdstone Opportunity Area stands out from other self-contained areas</p>	<p>The Council considers the Opportunity Area to be the most sustainable location in the borough to accommodate new development; this is reflected in its identification as an Opportunity Area in the London Plan. There is significant need for new housing, and it is appropriate that the most sustainable areas within the borough are fully explored for optimal capacity. This has been done through design-led capacity testing. It is a sustainable decision to locate growth in an area rich in public transport, jobs, and services. The figures set out in the London Plan (5000 homes and 1000 jobs) are indicative only and should be used as a starting point, which are to be tested through the design-led capacity assessment process.</p> <p>New development outside of the Opportunity Area will still be supported where proposals are in compliance with relevant development plan policies.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>such as Wembley, spanning 239 hectares, and Brent Cross, which covers 151 hectares. These areas are located on large plots of land, separate from existing residential neighbourhoods, and are mostly comprised of former industrial sites. As a result, it is unrealistic to expect them to provide the same level of benefits. The Harrow and Wealdstone Opportunity Area encompasses places like Station Road, which borders existing low-rise neighbourhoods where high-density development would not be suitable or desirable</p> <p>The term 'design-led development' has been used a lot in the Plan but doesn't appear to have any true meaning. Do you have a design template/ format which developers must follow? As things stand, each of the new developments would end up as an island on its own with no effort made to obtain a cohesive look or try to enhance or blend in with its surroundings. The Metroland identity referred to in the Plan has almost been lost.</p> <p>The Plan indicates that Harrow and Wealdstone have not progressed in line with their Metropolitan and District Area status, respectively. Do these designations rely on population size or economic productivity/value?</p> <p>Proposal: Maintain a capacity of 5,000 for the Opportunity Area and allocate the remaining sites for more suitable development. Regulation 18 initially proposed a capacity of 7,500 for the Opportunity Area, which has since been raised to 9,352. The capacity for this area is limited and simply cannot continue to increase indefinitely.</p>	
HARROW CIVIC RESIDENTS ASSOC.	<p>The plan says that suburban character will be retained however this ignores that the streets surrounding the 'Opportunity Area' such as those in the HARROW CIVIC RESIDENTS ASSOC. are predominately two storey houses. These homes will be under overbearing high-rise developments, damaging to the wellbeing of residents.</p> <p>The opportunity area includes Wealdstone, Greenhill and Marlborough are three of the four most deprived wards in Harrow in 2010, 2015 and 2019 Indices of deprivation (harrow.gov.uk). HARROW CIVIC RESIDENTS ASSOC. cannot understand how increasing the population in these areas will improve this situation and would surely cause further decline in the areas.</p> <p>The focus of concentrating new builds in one area is a cause for concern for future generations. This has been proven in the new towns, where they have fallen into dilapidation in mass with finances too stretched to remedy the scale of the problem. Therefore, HARROW CIVIC RESIDENTS ASSOC. believes the Opportunity Area will for future generations create 7500 homes which will not provide the thriving, healthier and happier environment Harrow Council says it seeks to create.</p>	<p>It is noted that densities within the Opportunity Area are higher than in surrounding areas, and this is an issue that needs to be managed through the appropriate design of new development.</p> <p>The London Plan (paragraph 2.0.7) identifies the role Opportunities Areas and strong focus on sustainable and inclusive regeneration can play in addressing issues of deprivation.</p> <p>No proposed modifications</p>
Hertsmere Borough Council	<p>Hertsmere's officers' support Harrow's priorities set out in the plan. We particularly support the boroughs approach to cultural and local identity led design by promoting heritage assets and high street regeneration. Hertsmere Borough Council supports the long term visions of boosting the local economy, protecting and strengthening existing infrastructure and delivery of housing.</p>	<p>Noted</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Peter Taylor	<p>Paragraph b states “New development within the Opportunity Area will by its nature be more intensive than elsewhere in the borough, due to the character of the area and its proximity to public transport and infrastructure”. The area is surrounded by a low rise residential area, which will be overlooked by the building of high rise towers, which the proposal allows. The character of the area was taken into consideration in the last Local Plan and high-rise tower blocks were restricted. The area has changed very little since then, the major exception being the Safari development which is not in keeping with the residential area it backs onto. The centre of Harrow has also had and continues to have multiple developments which has soaked up what demand there was for flats in that area. The Kodak development has also been built recently which further answers any demands for flats and apartments in the vicinity.</p> <p>Other relevant points which apply to this point and elsewhere on the plan are.</p> <ol style="list-style-type: none"> 1. Overemphasis on Growth: The policy prioritizes growth at the expense of maintaining the character and heritage of existing neighbourhoods. This could lead to overdevelopment and a loss of local identity. 2. Infrastructure Strain: There are concerns about whether the current infrastructure, such as healthcare facilities, schools, and utilities, can support the proposed growth. Without significant upgrades, increased population density might strain these services. 3. Environmental Impact: Overall the plan has potential negative environmental impacts, including increased pollution and reduced green spaces. The policy’s focus on high-density development could be seen as conflicting with sustainability goals. The plan doesn’t seem to mandate environmental steps that need to be taken in new plans, such as the use Solar power and batteries to complement their use. In a 405 page document about planning for the future, the word Solar is used only 5 times, recycling 17 times and battery/batteries not at all. 4. Affordability Issues: The plan does not adequately address housing affordability. 5. Community Involvement: Community involvement in the planning process has not been listened to. Residents feel that their voices are not being heard (or being heard and ignored) and that the consultation process is insufficiently. <p>These points reflect common themes in urban development and highlight the need for a balanced approach that considers growth, sustainability, and community well-being.</p>	<p>The spatial strategy seeks to direct growth and new development in the Opportunity Area, as this is the most sustainable location within the borough and is consistent with the London Plan. The Council’s evidence base indicates ongoing need for housing, notwithstanding recent developments in the Opportunity Area.</p> <p>Other matters set out in the representation relate to policy specific matters, which are set out within the draft new local plan.</p> <p>No proposed modifications</p>
Chandrakar Shah	<p>It is unfair to keep on directing growth to the Opportunity Area, which is already overcrowded.</p> <p>Please maintain the capacity at a reasonable number. The capacity for this area cannot continue to increase indefinitely in order to meet boroughwide targets. Targets must be fairly distributed so that all residents have a fair chance at a good quality of life.</p>	<p>The Harrow and Wealdstone Opportunity Area has been identified through the London Plan as a well serviced area with excellent access to transport, amenities and employment. This area has significant potential for regeneration through development which will allow for the reinforcement of infrastructure and the revitalisation of the public realm. Approximately half of all homes will be built in other areas across the borough throughout the plan at appropriate heights and densities. The draft Local Plan seeks to ensure the housing required to be delivered as set out in the London Plan.</p> <p>No proposed modifications</p>
Nimala Shah	<p>It is unfair to keep on directing growth to the Opportunity Area, which is already overcrowded and has already provided thousands of flats. Growth should be evenly spread out so everyone has a more comfortable life.</p> <p>Please do not keep on increasing capacity for the Opportunity Area.</p>	<p>The Harrow and Wealdstone Opportunity Area has been identified through the London Plan as a well serviced area with excellent access to transport, amenities and employment. This area has significant potential for regeneration through development which will allow for the reinforcement of infrastructure and the revitalisation of the public realm. More than half of all homes will be built in other areas across the borough</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>throughout the plan period at appropriate heights and densities. The draft Local Plan seeks to ensure the housing required to be delivered as set out in the London Plan.</p> <p>No proposed modifications</p>
Hilary & Lesley Coombes	<p>The proposed growth for the area is almost double that of ten years ago and quite out of proportion to that of other areas of Harrow. The Opportunity Area is part of Harrow, an outer London borough, not a congested, inner-city area.</p>	<p>The Harrow and Wealdstone Opportunity Area has been identified through the London Plan as a well serviced area with excellent access to transport, amenities and employment. This area has significant potential for regeneration through development which will allow for the reinforcement of infrastructure and the revitalisation of the public realm. More than half of all homes will be built in other areas across the borough throughout the plan period at appropriate heights and densities. The draft Local Plan seeks to ensure the housing required to be delivered as set out in the London Plan.</p> <p>No proposed modifications</p>
TfL	<p>Para. 2.0.10 - We note the insertion of new paragraph 2.0.10. The first sentence should be amended as follows: 'New growth requires infrastructure to support its potential impacts, such as highway transport improvements, school places, access to doctor surgeries.'</p>	<p>Noted and agreed.</p> <p>Proposed Modification</p> <p>Amend Para. 2.0.10 - ...New growth requires infrastructure to support its potential impacts, such as highway transport improvements, school places, access to doctor surgeries.'</p>
LB Brent	<p>In our comments at Regulation 18 stage we highlighted that, from Brent's perspective, Harrow's Local Plan should be more ambitious and proactive in terms of providing additional housing. We urged Harrow to place a greater emphasis on a proactive approach towards increased housing delivery, in the interests of local and London-wide social, economic and environmental benefits.</p> <p>We note that additional wording has been added to the 'Spatial Vision' second paragraph (page 22): 'The borough's housing and economic needs will be met and...' and this is welcomed.</p> <p>The Plan anticipates the Harrow & Wealdstone Opportunity Area as remaining a focal point for development. We acknowledge that a range of site allocations have been identified for inclusion within the Plan and that together these have an estimated indicative capacity of 8,882 dwellings (Table H1 on page 101). We welcome the commitment in Strategic Policy 01: High Quality Growth, part f. (page 31) to ensure development of a site is fully optimised whilst respecting the character of the area it is located in. We are very supportive of the emphasis on site optimisation set out in Policy GR12: Site Allocations and its supporting text (pages 80-82) including signposting London Plan policy and guidance.</p> <p>However, apart from the Harrow & Wealdstone Opportunity Area and the site allocations, the Plan does not clearly delineate areas where more intensive development would be appropriate, including areas where it would be accepted that the character of the existing area would be likely to change over the Local Plan period (similar to the approach taken in Brent Local Plan policy BH4). We would urge Harrow to more specifically identify additional areas suitable for intensification, for example stretches along major roads with high PTAL</p>	<p>The Council considers the Opportunity Area to be the most sustainable location in the borough to accommodate new development. There is significant need for new housing, and it is appropriate that the most sustainable areas within the borough are fully explored for capacity. It is a sustainable decision to locate growth in an area rich in public transport, jobs, and services.</p> <p>Aside from the Opportunity Area, proposed site allocations have been brought forward following a design led approach, ensuring the optimal use of respective sites. LB Harrow are required to meet the housing targets set out within the London Plan and required floorspace for employment and community use as set out in evidence base and the infrastructure delivery plan.</p> <p>Other locations across the borough that are sustainable locations are still available for development and where appropriate would find policy support within the local plan and it would be expected that housing delivery from those sites would be optimised having regard to the relevant policies within the Plan.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	scores. This would be likely to give clarity to prospective developers on opportunities and expectations and to help optimise growth in appropriate areas, increasing the contribution towards meeting London's very significant housing needs.	
LB Brent	We welcome the additional references to health improvement and creating healthy places within Chapter 02. This could be highlighted in the introductory sentence of Strategic Policy 01 with the addition of 'and promotes the creation of healthy and sustainable places'.	Noted and agreed Proposed modification: Strategic Policy 01, add to the end of the first sentence: '...provides necessary uses for Harrow residents and promotes the creation of healthy and sustainable places.'
LB Barnet	LB Barnet also supports the intention to meet the housing needs of existing and new communities, including appropriate levels of affordable housing and provision for other specific groups at sustainable locations together with the required supporting infrastructure, as detailed in Strategic Policy 01.	Support noted No proposed modifications
LB Barnet	LB Harrow needs to also consider the potential cumulative impact of their Site Allocations and those proposed by Hertsmere Borough in their draft Local Plan to the west of Borehamwood, Elstree Village and the east side of Bushey where there is an indicative capacity of 900 units.	Level of detail too specific at this stage given timeframes for delivery and infrastructure improvements. Level of detail will be undertaken to support any future planning application, where LB Barnet may be consulted as an adjoining Local Authority. No proposed modifications
Carter Jonas for Barratt London	Strategic Policy 01 (High Quality Growth) notes that the Harrow & Wealdstone Opportunity Area is able to accommodate growth and higher density development and thus new development and growth will predominantly be directed into the Harrow & Wealdstone Opportunity Area. Strategic Policy 01 also sets out that the Council will support appropriate tall building developments that are located within designated tall building zones. As set out in our response to the spatial strategy, it is considered that the Council's approach to focussing development within the Opportunity Area is one which will ensure the most sustainable development patterns for the Borough, and we therefore continue to strongly agree with the overall approach to high quality growth.	Support noted No proposed modifications
Savills for Unibar Restaurant Ltd	This criterion of the policy makes no reference to the development potential of Kenton Road which does not align with the evidence base. Accordingly, part a. should be amended as follows: a. The Harrow & Wealdstone Opportunity Area can accommodate growth and higher density development due to its existing character. Further to this, minor corridors such as Honeypot Lane, Kenton Road, Marsh Lane and London Road can accommodate growth and higher density development due to their enhanced accessibility and strategic location. Smaller centres and the strong suburban Metroland character areas are much more sensitive to change.	The spatial strategy is to direct the majority of growth into the Harrow & Wealdstone Opportunity Area. However, growth will be supported in sustainable locations outside the Opportunity Area where appropriate to the context within which it is located. No proposed modifications
Savills for Unibar Restaurants Ltd	This criterion of the policy makes no reference to the development potential of Kenton Road which does not align with the evidence base. Accordingly, part b. should be amended as follows: b. New development and growth will predominantly be directed into the Harrow & Wealdstone Opportunity Area. New development within these areas will by its	The spatial strategy is to direct the majority of growth into the Harrow & Wealdstone Opportunity Area. However, growth will be supported in sustainable locations outside the Opportunity Area where appropriate to the context within which it is located. No proposed modifications

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>nature be more intensive than elsewhere in the borough, due to the character of the area and its proximity to public transport and infrastructure. Development will also be directed to identified minor corridors provided it does not adversely impact the character of area, the existing and planned capacity of infrastructure and complies with other policies of the Development Plan.</p>	
Places for London	<p>Our suggestions have not been incorporated in the amended policy. The Housing Trajectory (page 294) now shows that development and growth within the OA will outpace other parts of the borough. Notwithstanding, the principle still stands that in the other parts of the borough higher density, optimised development should be encouraged in in the most sustainable locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling (ie. areas close to underground and railway stations and other transport hubs). Optimising site capacity and development opportunities through sensitively designed, higher density schemes is a key aspect of the design-led approach set out in London plan policy D3 (<i>Optimising site capacity through the design-led approach</i>) and must be reflected in this policy which currently reads as too restrictive and unambitious. This lack of ambition and failure to optimise development potential is reflected in the draft Plan's site allocations (SA) for our sites (see below).</p>	<p>Strategic Policy 1 sets out how it encourages growth into Harrow & Wealdstone Opportunity Area, as required by Policy SD1 (Opportunity Areas) of the London Plan (2021). The Opportunity Area is the most sustainable location within Harrow and has the most capacity to deliver the growth required across the plan period. Outside of the Opportunity Area, new development that is brought forward in accordance with London Plan Policy D3 (Optimising site capacity through the design-led approach) and other relevant policies of the development plan will be supported.</p> <p>This is supported by SP1(d).</p> <p>Site allocation capacities have been informed by design-led capacity studies, consistent with the London Plan and associated guidance and are indicative only.</p> <p>No proposed modifications</p>
Mitsh Shah	<p>The growth allocated to the Opportunity Area is disproportionate, placing an undue burden on it. Since its inception in 2013, it has already produced over 3,500 units. The area is relatively small, comprising 69 hectares compared to the borough's 5,047 hectares. The capacity of the Opportunity Area has been repeatedly revised, from an initial 2,900 units to the current 9,352, accounting for 58.3% of the borough's 16,040 housing target. This area represents only 1.3% of the borough's size, making the situation markedly unfair.</p> <p>According to the London Plan 2021, the Opportunity Area has a capacity of 5,000 homes and 1000 jobs. By 2029, this number will have been reached, and the London Plan 2021 does not call for an additional 4352 units. There is no rationale for increasing housing in the Opportunity Area. The remaining sites should be developed into proper family housing that aligns with the character of the area and maintains the low-rise nature of Station Road.</p> <p>If the current trajectory continues, the Opportunity Area will have produced nearly 13,000 homes by the end of the plan period. The area is already overdeveloped, negatively affecting the quality of life for both existing and new residents. Adding more flats will exacerbate this issue. Past regeneration efforts have increased inequality within the borough, with those living near the Opportunity Areas experiencing the most significant decline in living standards due to the strain on existing infrastructure. For example, power cuts have become more frequent in neighbourhoods in and adjacent to the Opportunity Area. Despite 11 years of 'regeneration,' the Opportunity Area appears rundown, dirty, and unappealing, suggesting that the regeneration strategy isn't working.</p> <p>The Harrow and Wealdstone Opportunity Area stands out from other self-contained areas such as Wembley, spanning 239 hectares, and Brent Cross, covering 151 hectares. These areas are located on large plots of land, separate from existing residential neighbourhoods,</p>	<p>The Council considers the Opportunity Area to be the most sustainable location in the borough to accommodate new development; this is reflected in its identification as an Opportunity Area in the London Plan. There is significant need for new housing, and it is appropriate that the most sustainable areas within the borough are fully explored for optimal capacity. This has been done through design-led capacity testing. It is a sustainable decision to locate growth in an area rich in public transport, jobs, and services. The figures set out in the London Plan (5000 homes and 1000 jobs) are indicative only and should be used as a starting point, which are to be tested through the design-led capacity assessment process.</p> <p>New development outside of the Opportunity Area will still be supported where proposals are in compliance with relevant development plan policies.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>and are mostly comprised of former industrial sites. As a result, it is unrealistic to expect them to provide the same level of benefits. The Harrow and Wealdstone Opportunity Area encompasses places like Station Road, which borders existing low-rise neighbourhoods where high-density development would not be suitable.</p> <p>Proposal: Maintain a capacity of 5,000 for the Opportunity Area and allocate the remaining sites for more suitable development. Regulation 18 initially proposed a capacity of 7,500 for the Opportunity Area, which has since been raised to 9,352. The capacity for this area cannot continue to increase indefinitely.</p>	
Historic England	<p>Strategic Policy 01.C, High Quality Growth</p> <p>We welcome the requirement in this policy for tall buildings to be of high-quality design and appropriate height. It also states that they should comply with the Tall Buildings policy, which makes sense. However, we would query if this could be misconstrued as suggesting that this is the only policy that they need to comply with, and whether a generic reference to other plan policies or reminder to read the plan as a whole might be helpful?</p>	<p>The Local Plan needs to be read as a whole, and all policies apply to development in the borough where relevant. A generic reference to other plan policies after reference to individual policies would add significant text to the Local Plan with limited benefit.</p> <p>No proposed modifications</p>
Historic England	<p>Strategic Policy 01, High Quality Growth and Supporting Text paras. 2.07 and 2.08</p> <p>We welcome the references at paragraphs 2.07 and 2.08 to the Harrow Characterisation and Tall Building Study, and to the fact that the significance of heritage assets is required when considering design. However, we would recommend that this is expanded to better articulate the integral relationship between good design and the historic environment. We note that there is a paragraph to this effect in the historic environment chapter so perhaps pull this up or cross reference to it?</p> <p>As a point of accuracy, we'd also query if policy HE1 should be cross-referenced rather than S02?</p>	<p>The Council considers that heritage and design are appropriately couched within the supporting text / Local Plan when read as a whole.</p> <p>Noted and agreed re incorrect cross-reference.</p> <p>Proposed modification</p> <p>Amend paragraph 2.0.7 as follows: 'Heritage assets contribute to Harrow's character across the borough and their significance needs to be considered as part of all development proposals (see Strategic Policy 02HE1 (Historic Environment)).'</p>

Policy GR1 - Achieving a High Standard of Development

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Leslie Coombes	<p>According to the London Plan 2021, the Opportunity Area has a capacity of 5,000 homes and one thousand jobs. By 2029, this number will have been reached, and the London Plan 2021 does not call for an additional 4352 units. There is no rationale for increasing housing in the Opportunity Area. The remaining sites should be developed into proper family housing that aligns with the character of the area and maintains its low rise architecture</p>	<p>The Council considers the Opportunity Area to be the most sustainable location in the borough to accommodate new development; this is reflected in its identification as an Opportunity Area in the London Plan. There is significant need for new housing and it is appropriate that the most sustainable areas within the borough are fully explored for optimal capacity. This has been done through design-led capacity testing. It is a sustainable decision to locate growth in an area rich in public transport, jobs, and services. The figures set out in the London Plan (5000 homes and 1000 jobs) are indicative only and should be used as a starting point, which are to be tested through the design-led capacity assessment process.</p> <p>New development outside of the Opportunity Area will still be supported where proposals are in compliance with relevant development plan policies.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Standard Response 1	<p>The growth allocated to the Opportunity Area is disproportionate, placing an undue burden on it. Since its inception in 2013, it has already produced over 3,500 units. The area is relatively small, comprising 69 hectares compared to the borough's 5,047 hectares. The capacity of the Opportunity Area has been repeatedly revised, from an initial 2,900 units to the current 9,352, accounting for 58.3% of the borough's 16,040 housing target. This area represents only 1.3% of the borough's size, making the situation markedly unfair.</p> <p>According to the London Plan 2021, the Opportunity Area has a capacity of 5,000 homes and 1000 jobs. By 2029, this number will have been reached, and the London Plan 2021 does not call for an additional 4352 units. There is no rationale for increasing housing in the Opportunity Area. The remaining sites should be developed into proper family housing that aligns with the character of the area and maintains the low-rise nature of Station Road.</p> <p>If the current trajectory continues, the Opportunity Area will have produced nearly 13,000 homes by the end of the plan period. The area is already overdeveloped, negatively affecting the quality of life for both existing and new residents. Adding more flats will exacerbate this issue. Past regeneration efforts have increased inequality within the borough, with those living near the Opportunity Areas experiencing the most significant decline in living standards due to the strain on existing infrastructure. For example, power cuts have become more frequent in neighbourhoods in and adjacent to the Opportunity Area. Despite 11 years of 'regeneration,' the Opportunity Area appears rundown, dirty, and unappealing, suggesting that the regeneration strategy isn't working.</p> <p>The Harrow and Wealdstone Opportunity Area stands out from other self-contained areas such as Wembley, spanning 239 hectares, and Brent Cross, covering 151 hectares. These areas are located on large plots of land, separate from existing residential neighbourhoods, and are mostly comprised of former industrial sites. As a result, it is unrealistic to expect them to provide the same level of benefits. The Harrow and Wealdstone Opportunity Area encompasses places like Station Road, which borders existing low-rise neighbourhoods where high-density development would not be suitable.</p> <p>Proposal: Maintain a capacity of 5,000 for the Opportunity Area and allocate the remaining sites for more suitable development. Regulation 18 initially proposed a capacity of 7,500 for the Opportunity Area, which has since been raised to 9,352. The capacity for this area cannot continue to increase indefinitely.</p>	<p>The Council considers the Opportunity Area to be the most sustainable location in the borough to accommodate new development; this is reflected in its identification as an Opportunity Area in the London Plan. There is significant need for new housing, and it is appropriate that the most sustainable areas within the borough are fully explored for optimal capacity. This has been done through design-led capacity testing. It is a sustainable decision to locate growth in an area rich in public transport, jobs, and services. The figures set out in the London Plan (5000 homes and 1000 jobs) are indicative only and should be used as a starting point, which are to be tested through the design-led capacity assessment process.</p> <p>New development outside of the Opportunity Area will still be supported where proposals are in compliance with relevant development plan policies.</p> <p>No proposed modifications</p>
Places for London	<p>While we welcome the Council's aspiration to "<i>ensure the most efficient and optimal use of land</i>" and application of a 'design-led approach' (paragraph B), there could be a tension between this and the following paragraph's reference to "<i>responding appropriately to the local context in terms of building height, bulk, massing, footprint, building line, scale and existing design characteristics</i>" (paragraph B.a). The policy (not supporting text or Supplementary Planning Documents) should make clear that this does not mean that local heights etc cannot be exceeded as it will be necessary to do so in order to "<i>ensure the most efficient and optimal use of land</i>". In addition, we reiterate that the Plan should encourage higher density, optimised development in the most suitable, sustainable and well connected locations (ie. close to underground and railway stations and other transport hubs) – please see above.</p>	<p>A design-led approach requires new development to respond to the existing character and distinctiveness of the surrounding context. It is not appropriate to have a general statement that heights can exceed the local context, as appropriate heights must be achieved through the design-led process. It cannot be reasonably interpreted that the policy as drafted limits heights to that of the prevailing area.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	Parts D should be deleted from the policy. It is already implicit within parts B and C that if schemes do not comply with them they will be resisted. This does not need to be repeated again in part D. The policy is not sound and its repetition will make it long, more complex and difficult to use than it should be as so less effective in what it sets out to achieve. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	The Council is of the opinion that the inclusion of Part D provides more certainty and does not result in a policy that is complex or difficult to use. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Part E should also be deleted. The policy anticipates further guidance which may or may not come forward. Now is the opportunity for the LPA to produce that guidance and provide a comprehensive planning framework for the local area. Either they should provide this guidance and knit it into the policy framework provided by the new local plan or if they cannot provide that guidance, Part E should be deleted. The guidance for HMO should form provide part of the evidence base to be considered now not at some future date. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Part E of this policy sets out future design guidance which would not be appropriate to be included within the local plan policy. Policy GR1E provides a policy hook / cross-reference for future more detailed guidance for the considerations set out in Parts B and C beyond policy and supporting text specifically in relation to householder extensions and flat conversions. The Council intends to prepare this guidance once the Local Plan is adopted, in the form of a Supplementary Planning Document (or any subsequent replacement for SPDs); such an approach is consistent with the NPPF and therefore does not impact upon soundness. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Part F is vague and should be deleted. The circumstances in which the potential for future development may be prejudiced are not set out and cannot be known and it is unreasonable to have a strategic policy that tries to regulate detailed matters at such a high level of generality. This policy adds nothing to what is an already over Long local plan and should be deleted. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Policy GR1 is not a strategic policy. The policy seeks to ensure new development makes the optimal use of developable land given its relative scarcity and requirement to meet housing numbers and other development needs. The part is considered to represent sound planning practice and provides greater certainty with respect to the impact of development of a site in relation to the adjoining sites / balance of any allocation. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Part H of the policy is vague and uncertain and it is not clear from the policy what healthy places are, whether this is a policy designation or some tangible planning objective. If it is not clear why contributing to healthy places is the same as achieving a high standard of design and layout. In addition the policy confuses high standard of design and layout with detriment to local character appearance which are different things. Finally healthy places are not to find in the glossary to the local plan creating further uncertainty. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	It is not clear what the representor is referring to. Part H of Policy GR1 seeks to ensure non-residential development and new public realm must be accessible to all, consistent with the Council's legal obligations. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Part B there are too many criteria within this policy which pull in different directions. It is not clear that they all contribute to optimising development. For instance the use of high-quality durable materials reflecting local character does not optimise development nor does providing high-quality landscaping. These are aspects that contribute to the quality of a development but this is not the same thing as optimising the volume of development that a site can withstand. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Part B provides criteria that relates to a high-quality development, which are able to assist in providing the most optimal use of land. Design measures that respond to site specific circumstances can ensure a more optimal use of a site than in circumstances where not incorporated. No proposed modifications

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	The catch all requirement at H at everything must comply with plan standards anyway means that everything else within a policy is in any event obsolescent. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Part h of Policy GR1 ensures new developments is progressed in accordance with the relevant policies within the development plan, for which this policy is part, as it relates to design in a general sense. It sets out in one place the many of the relevant design considerations for most new development and cross refers to the fact there are other standards that need to be complied with but are covered elsewhere in the development plan (i.e. car parking, urban greening etc). It does not make all other standards obsolete as it requires them to be present within a policy. No proposed modifications
Environment Agency	As mentioned in our Regulation 18 response, we suggest using more robust wording for clause c (e.g. changing the word 'should' to 'must') to make the policy sounder and more effective in terms of retaining and enhancing biodiversity. We also recommend including wording to ensure 'biodiversity mitigation hierarchy' is followed.	GR1B(c) is worded to in recognition that not all circumstances allow for the retention of all biodiversity, rather ensuring it is considered and in some circumstances some removal may be acceptable when weighed in the planning balance. No proposed modification
Environment Agency	Furthermore, we recommend the inclusion of rivers within this text, to support wildlife corridors and biodiversity. We suggest the following proposed wording: <i>B. To ensure the most efficient and optimal use of land, proposals must take a design led approach by:</i> <i>c. Providing high quality (hard & soft) landscaping, amenity space and play space to support the overall quality of a successful development. Proposals should seek to retain or enhance existing landscaping, biodiversity or other natural features of merit (including rivers and the riparian zone).</i> Excess shading hinders the growth of some riverine plants which impacts on foraging species and consequently biodiversity. Therefore, we recommend amendments to the policy wording to ensure all buildings are sufficiently set back to not overshadow the river channel. Buildings must be designed to minimise the impact of shading to sensitive receptors such as rives and wetlands; an assessment of the impacts should be provided with the development proposal. We believe this will also fit in well with the proposed policy GR4: Building Heights.	Noted and considered a reasonable suggestion Proposed modification Amend paragraph GR1B(c) as follows: 'c. Providing high quality (hard & soft) landscaping, amenity space and play space to support the overall quality of a successful development. Proposals should seek to retain or enhance existing landscaping, biodiversity or other natural features of merit (including rivers and the riparian zone).'
Historic England	Policy GR1.B, Achieving a High Standard of Development We welcome this policies requirement for development to be design-led and support the text at para. 2.13. However, we would ask for the historic environment and protected views to be specifically referenced as elements of the local context in line with the GLA's guidance and the National Design Guide.	Proposed modification: Amend paragraph 2.1.3 as follows: 'New development where appropriate should address the National Model Design Code, National Design Guide and London Plan Optimising Site Capacity Guidance, to ensure development opportunities are optimised and address all relevant material planning considerations, including local context (such as the historic environment and protected views heritage etc).'
Historic England	Paragraph 2.1.8 would benefit from clarification. It states that development in character areas should be considered against Harrow's Tall Buildings Supplementary Planning Document (SPD). We would query if it what it means to say is that development in areas identified as potentially appropriate for tall buildings must be considered against this guidance? And, if so, would it be better referenced along with the guidance mentioned at 2.1.3? Is it also worth adding that Harrow has a range of Conservation Area SPDs that should help shape high quality design in those areas?	The Tall Buildings (Building Heights) SPD referred to applies to areas outside the Harrow and Wealdstone Opportunity Area, being Harrow's suburban areas to which the paragraph relates; no amendment is required. No proposed modifications

Policy GR2 - Inclusive Neighbourhoods

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Dharmesh Patel	Supports the policy	Noted No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Nowhere in this policy is the term inclusive neighbourhood defined. The definition should be integral to the policy and its explanation and should appear within this part of local plan as well as the glossary. Inclusive neighbourhoods are not defined in the NPPF or G and do not form part of national planning policy which does not therefore support the concept.	Inclusive neighbourhood is defined in the Local Plan glossary (Appendix 1) and the London Plan (2021) glossary. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	In any events the definition chosen by the LPA for inclusive neighbourhood is vague, lacks precision and is not capable of analysis or demonstrable analytical definition. Policy GR2A cannot therefore be complied with because it deals with a concept that is fundamentally too vague. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	The definition is consistent with the London Plan (2021) which has been accepted by the Secretary of State and already forms part of the Council's development plan. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	The concept of Inclusive Neighbourhoods in this plan is so vague that it is not possible for schemes to demonstrate how they can contribute to towards them. In addition it is not reasonable to expect schemes to try and control matters that lie beyond the site boundary as this policy seeks. Public realm improvements can only come forward by way of a s106 Agreement, and the test for whether schemes are acceptable is whether they meet the tests set out in Regulation 123 of the CIL Regulations. These should be referenced in this policy not the vague formula "where appropriate". The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Public realm is not necessarily only secured through S.106 agreements, specifically as part of a major application. Major schemes often include public realm and this policy seeks to ensure these are inclusive spaces. Public realm is not the only element of Inclusive Neighbourhoods and the contribution a development proposal can make towards their achievement. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Part C should be deleted as this is not a function of a major strategic policy. It is a matter dealt with in detailed policy elsewhere in the plan and also via the building regulations. Incorporating detailed criteria such as this in strategic policies only serves to make the local plan unnecessary long, repetitive and complex. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Policy GR2 is not a strategic policy, and is considered to provide appropriate policy and guidance for major town centre development to achieve inclusive neighbourhoods. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Part D should also be deleted because these matters will be dealt with else in the local plan and detailed heritage policies to follow. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Policy GR2 ensures that access to the historic environment is achieved at the outset as part of any new development which is a central theme to place making. No proposed modifications

Policy GR3 - Public Realm and Connecting Places

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	We welcome the addition of paragraphs 2.3.18 – 2.3.23 which address safety issues including violence against women and girls.	Noted No proposed modifications

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	<p>This policy is too general and repeats matters that are better dealt with elsewhere under specific topic policies later in the Plan. If developments are large enough to propose public realm and public realm improvements, then these are matters that are better dealt with in a site allocations policy or in specific brief's for individual sites. It is most unlikely that an application will come forward for a significant area of public realm by itself and in any event it is not clear what a public realm development is. The only body capable of promoting such an application is the local authority itself because it will by definition involve land that is in public ownership. This policy should be deleted in its entirety as it repeats policy specific topics the deal dealt with elsewhere a local plan and because it is unnecessarily complex and repetitive. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Large scale developments are capable of delivering public realm and therefore there must be a policy in place to assist with such delivery. It is not appropriate to leave this purely to site allocations or site-specific briefs, which must be anchored in policy to require such works. Large windfall sites may come forward that would not benefit from a site allocation.</p> <p>No proposed modifications</p>
Environment Agency	We are pleased to see the updates made to these policies since our last response.	<p>Noted</p> <p>No proposed modifications</p>
Historic England	<p>Policy GR3A.F, Inclusive Design</p> <p>We support the ambition of policy GR3A.F and the reference to our Improving Access guidance at para. 2.3.16. However, we are concerned by the wording ‘...and substantial harm to the heritage significance of the asset is avoided.’ Substantial harm is a high test and, where it is the result of a proposed development, local authorities should refuse consent unless it can be demonstrated that it is necessary to achieve substantial public benefits that outweigh that harm. The NPPF makes it clear that instances where public benefits outweigh substantial harm should be "exceptional" in most cases, or "wholly exceptional" in respect of assets of the highest significance. For conformity, we therefore advise that this wording is amended. For example: <i>‘Accessible and inclusive adaptations of heritage assets will be supported if harm to their significance is avoided and minimised, as well as outweighed by the public benefit of the adaptation.’</i></p>	<p>Noted</p> <p>Proposed Modification:</p> <p><u>Replace Part F with the following: Accessible and inclusive adaptations of heritage assets will be supported if harm to their significance is avoided and minimised, as well as outweighed by the public benefit of the adaptation.</u></p>

Policy GR3a - Inclusive Design

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Sunil Kapoor	The term 'design-led development' has been used a lot in the plan but doesn't appear to have a true meaning. Do you have design templates/ formats which developers must follow? Each of the new developments wants to be an island on its own with no effort made to create a cohesive look or trying to enhance or blend in with its surroundings. The Metroland identity referred to in the plan has almost been lost.	<p>Design-led development is widely accepted and common approach, set out in the London Plan (2021) (Policy D3). It requires all new development to make the best use of land that optimises the capacity of sites. The Mayor of London provides guidance on the design led approach within the ‘Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023)’ document.</p> <p>No proposed modifications</p>
Zahir Abdulla	The plan often references "design-led development," yet it's unclear if developers are adhering to specific design guidelines or templates. The current approach results in disparate and	Design-led development is widely accepted and common approach, set out in the London Plan (2021) (Policy D3). It requires all new development to make the best use of land that optimises the capacity of sites. The Mayor of London provides guidance on

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	disconnected developments, disregarding the importance of a unified urban character. This neglects the Metroland identity and diminishes the overall quality of the built environment.	the design led approach within the 'Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023)' document. No proposed modifications
Places for London	<p>Please note that the text for new policy GR3A differs between the versions in the <i>Harrow Local Plan – Proposed Submission Version</i> and the <i>Schedule of Changes Post Regulation 18</i>. Clearly this needs to be clarified. We base our representations below on the latter.</p> <p>We suggest modification to paragraph GR3A E to clarify what is meant by “no design differences”, which is currently expressed too widely. For eg. while it is generally appropriate and beneficial for there to be no external differences in terms of quality and design between market and affordable homes, it would not be appropriate to control the internal layout and design of homes and communal spaces in this way. Registered Providers (RP) have their own requirements and standards which will not necessarily match those for ‘build for sale’ or ‘build to rent’. We also suggest replacing the word “must” with “should” in order to provide some flexibility in cases where RPs would prefer a different design for practical, management or cost reasons.</p> <p>In addition, we also query the requirement for “all communal private amenity space” to be accessible to all residents, regardless of tenure. By its nature, communal amenity space is not <i>private</i>, but <i>shared by residents</i>. In addition, in many schemes separate areas of communal amenity space will be allocated to particular buildings for reasons of adjacency and security. We therefore suggest:</p> <p>Development proposals for housing must be tenure neutral, there should must be no external design or quality differences based on the tenure of dwellings. All Communal private amenity space must be accessible to all residents and provided for all tenures. regardless of tenure;</p> <p>This clarification would help to ensure that the Plan is sound.</p>	<p>The internal layout of a property should be of a high quality for all residents regardless of tenure, whilst there will be a difference in layout, it must remain functional, comply with space standards, and provide a good level of light and outlook.</p> <p>Communal private amenity space is that which is used solely by a development (rather than wider public access), and therefore all residents within a development must have access.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Policy GR3A repeats elements of policies GR1 G and H and policy GR2. It adds nothing to what has been said before or will be said in policies to come and therefore simply adds additional and unnecessary repetition and complexity. This policy should be deleted.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Policy GR1 H links directly to Policy GR3A to provide criteria to ensure new development achieves inclusive design. It provides more scheme specific criteria than Policy GR2.</p> <p>No proposed modifications</p>

Policy GR3b - Safety, Security and Resilience to Hazards

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	<p>This policy still needs with public realm. Public realm is not the leading issue in Harrow or indeed London and does not deserve this over generous planning policy treatment. Development of the public realm is primarily the responsibility of the LPA and they can adopt these additional standards if they wish. All of the matters in policy GR3B can be dealt with as specific matters in applications which will only constitute a tiny proportion of applications made within the LPA over the life of the plan. In any event this policy simply replaces repeats</p>	<p>Policy GR3b provides specific guidance on counter terrorism measures, which could be included within public realm (either delivered by the Council or an applicant as part of a major development), and to buildings (either new build or by way of conversion) to more sensitive uses. This cannot be set out within Policy GR3 (Public Realm and Connecting Places) which is a design policy rather than focusing on counter terrorism.</p>

	<p>policies elsewhere in the plan and adds unnecessary repetition and complexity which will make using the local plan less efficient than it should be. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Recent practical examples have demonstrated the need for specific Local Plan policy in relation to this matter.</p> <p>No proposed modifications</p>
<p>Greg Dowden / Broadgate Development Partners Ltd</p>	<p>Policy GR3AB applies to all planning applications. It is clearly unreasonable to consider counter terrorism measures in relation to every planning application that is to be submitted to the LPA over the next plan period. It is one thing to deal with secure by design and crime prevention which can be picked up in the usual way through liaison with Metropolitan police but this policy requires on top of that specific counterterrorism considerations to be taken into account.</p> <p>This is an extremely niche and specialist area and it is unclear how this is to be promoted via an application. It appears that it will be a requirement that a counter terrorism assessment is made of each application for the LPA to consider and it highly surprising if the LPA have the expertise in-house to even assess such a report if it were to be submitted. Introduction of counter terrorism measures as a mainstream planning policy applicable to all applications to be made in the LPA is not required by the London Plan which only mentions counter terrorism once in the whole document and then in a justification not a policy. It is plainly unworkable and unreasonable, not least because paragraph 2.3.28 of the supporting text states that “Harrow is one of the safest boroughs within London (second in 2024)”. Clearly the evidence is that such a policy is therefore not required in Harrow.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Each application would need to consider Policy GR3b in the context of what is being proposed. Any proposal would be required to submit a commensurate level of supporting detail depending on the proposed use of the building / space. Detail submitted in relation to this matter is reviewed by the Metropolitan Police (Counter Terrorism Department).</p> <p>The Local Plan covers a period out to 2041 and therefore including such a policy ensures that development would be futureproofed in relation to such matters.</p> <p>No proposed modifications</p>

Policy GR4 – Building Heights

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
<p>Standard Response 1</p>	<p>Policy GR4: Building Heights Policy GR3: Public Realm and Connecting Places</p> <p>Are the Policies Sound: No</p> <p>The Plan indicates that tall buildings would be permissible in the Opportunity Area, considering their proximity to transport hubs, the existing low-rise area, and town centres. The Harrow and Wealdstone Opportunity Area Tall Buildings Study, page 96, shows the highest composite scores for tall building suitability were for sites adjacent to Harrow on the Hill Station and Harrow and Wealdstone Station. However, 12-story buildings have been designated for sites behind these stations, while the Tesco site, with a lower composite score, has been allocated 15 stories. This site is not actually in the Town Centre. It lies close to a low-rise suburban area outside the Opportunity Area, is not near a green space larger than 2 hectares, is farther from the train stations, has a relatively low PTAL, and is near one outlier tall building, which is already proving to be a blot on the local landscape before it is even finished. The reason for this discrepancy has not been made transparent.</p> <p>Ironically, the Council's Tall Buildings Study identifies the Station Road sub area as unsuitable for tall buildings, yet the Council permits buildings up to 18 storeys without any clear</p>	<p>The spatial strategy seeks to direct growth to the most sustainable location within Harrow, which is the Harrow & Wealdstone Opportunity Area.</p> <p>The Harrow & Wealdstone Opportunity Area Tall Building Study (2024) sets out (Page 128, section 5.11) that the Station Road corridor is sensitive to tall buildings. Whilst growth should be encouraged along the corridor, it is predominantly unsuitable for tall buildings. This is due to the existing and intact parades and terraces, as well as protecting the amenity of the 2 storey residential houses to the east and west of the corridor.</p> <p>However, the study also recognises that there are key sites along the Station Road corridor that are suitable for tall building development, and that development should step down to considerately meet and reflect the existing heights surrounding the sites / opportunity area.</p> <p>The methodology for locations and appropriate heights for buildings is set out in the Harrow & Wealdstone Opportunity Area Tall Building Study (2024). This is based on a sound methodology accepted as appropriate evidence base for local plan examinations.</p>

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	<p>justification. The Harrow and Wealdstone Opportunity Area Tall Buildings Study gives Harrow Square as an example of unsuitably sited tall buildings which has created a wind tunnel and poor public realm amenities. Harrow One in Wealdstone is also cited as a poor example of a tall building. Given these past mistakes, is the Council not repeating the same by proposing to allow tall buildings in areas they themselves have deemed to be unsuitable? This needs explanation and proper justification.</p> <p>The Council also claims to be retaining the human scale of Station Road, but the proposals are quite contradictory. Residents have plainly expressed their desire for a maximum building height of 7 stories, in line with the study's own findings.</p> <p>The method for determining these heights is not at all transparent, seeming to reflect developer interests for profit rather than strategic planning and any benefit to the resident population.</p> <p>A proposed change is to reassess the reasons/logic of why the Tesco site is being targeted for tall buildings, in direct conflict with resident needs and wishes, and the Council's own conclusions</p>	<p>The Council consider that Policy GR4 as drafted reflects this evidence base</p> <p>The developments noted in the representation were permitted prior to the draft Local Plan, and the Council consider that Policy GR4 will assist in improving the design quality of future tall building developments.</p> <p>No proposed modifications</p>
Peter Taylor	<p>Point 2.4.4 states “..... care needs to be taken to ensure that even within designated tall building zones, stitching into the wider and often much less dense / tall character areas must be satisfactorily demonstrated. “but it does not set out what criteria for the care that will be taken. By not stating the criteria by which the care will be measured it leaves this point wide open to interpretation. A cursory display of acknowledging point 2.4.4 in any future planning decisions could suffice to display care, and tall buildings of any sort could then be built. Policy GR4 represents a double standard, whereby areas close to or in the Harrow & Wealdstone Opportunity Area are not considered in the same way as areas outside.</p> <p>In addition, tall buildings by their very size and demands by a larger number of residents impact a far wider area than just the footprint of the site. The tall buildings that have been built in Harrow to date have changed the areas they have been built in and surrounding neighbourhoods which area site, especially when they have been built close to smaller residential buildings.</p> <p>Harrow Council itself objected to the Palmerstone Road development in Wealdstone only to be overruled by the Mayor of London. The building heights which are being allowed in this document will be in areas similar to Palmerstone Road, so it would be thought the same logic would apply and the Council would not want them.. The Council should not plan for tall buildings where they and the present residents don't want them, where they do not fit into the surrounding area and do not answer the demands for housing that exist in Harrow. Harrow needs family homes not more 1 and 2 bedroom multistorey blocks of flats.</p>	<p>Proposals for tall buildings will need to consider all relevant policies within the Development Plan, which will set out material considerations when assessing such applications. Furthermore, the design-led approach and ensuring site optimisation is achieved, will include a thorough understanding of the character and context of the wider area which will shape how new development and in particular, tall buildings will come forward on a development site.</p> <p>Whilst the Council refused planning permission for the schemes noted in the representation, they now benefit from planning permission and form part of the character and context of the area within which they are located. The Council consider that Policy GR4 will assist in decision making for proposals that constitute tall buildings in the future.</p> <p>Tall buildings zones have been identified through an evidence-based approach and set out in policy and policies maps as required by the London Plan (2021), with the Harrow & Wealdstone Opportunity Area identified as the most sustainable and appropriate location for them. Policy HO1 (Dwelling size mix) sets out the Councils position on delivery of housing sizes from all new relevant developments.</p> <p>The Palmerstone Road scheme referred to dates back to 2016/17; there have been significant changes at national and regional levels with respect to planning policy, as well as significant development of local evidence base since that time.</p> <p>No proposed modifications</p>
Hilary & Leslie Coombes	<p>Harrow's Conservative Council came into office saying they were not in favour of very tall buildings, yet proposals for the Tesco site range up to fifteen storeys. The Council's own Tall Buildings Study says Station Road is unsuitable for tall buildings but tall buildings are proposed there. Both the Tesco site and Station Road lie close to low-rise suburban housing which is outside the Opportunity Area. There needs to be a reassessment of whether the</p>	<p>The spatial strategy seeks to direct growth to the most sustainable location within Harrow, which is the Harrow & Wealdstone Opportunity Area.</p> <p>The Harrow & Wealdstone Opportunity Area Tall Building Study (2024) sets out (Page 128, section 5.11) that the Station Road corridor is sensitive to tall buildings. Whilst</p>

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	<p>proposed height and density of buildings in the Tesco and the Opportunity Area is in the best interests of residents.</p>	<p>growth should be encouraged along the corridor, it is predominantly unsuitable for tall buildings. This is due to the existing and intact parades and terraces, as well as protecting the amenity of the 2 storey residential houses to the east and west of the narrow corridor.</p> <p>However, the study also recognises that there are key sites along the Station Road corridor that are suitable for tall building development, and that development should step down to considerately meet and reflect the existing heights surrounding the sites / opportunity area.</p> <p>The Council consider that Policy GR4 as drafted reflects this evidence base.</p> <p>No proposed modifications</p>
Pat Beazley	<p>The council aims to protect the suburbs by directing most of development into the Opportunity area. The suburbs are defined as areas outside the opportunity area, but no protection has been given to the suburban areas adjacent to the opportunity area. The council is proposing tall buildings in these areas. This strategy puts the rights (to a decent standard of living) of Residents living in suburbs above those in and adjacent to the opportunity area.</p> <p>The council should show that they really put all Residents first, by ensuring Harrow is not overdeveloped. Putting a cap of 7 storeys in the station Road area would show they care about the quality of life of all residents.</p>	<p>The Harrow & Wealdstone Opportunity Area Tall Building Study (2024) sets out (Page 128, section 5.11) that the Station Road corridor is sensitive to tall buildings. Whilst growth should be encouraged along the corridor, it is predominantly unsuitable for tall buildings. This is due to the existing and intact parades and terraces, as well as protecting the amenity of the 2 storey residential houses to the east and west of the narrow corridor.</p> <p>However, the study also recognises that there are key sites along the Station Road corridor that are suitable for tall building development, and that development should step down to considerately meet and reflect the existing heights surrounding the sites / opportunity area. The Tall Building Study (2024) sets out appropriate site movements, and Policy GR4E(a) explicitly refers to the wider context.</p> <p>No proposed modifications</p>
Oden House RA	<p>I think that the public community should be provided with more transparent detail in plain English and subsequently a period of adequate time to socialise the documents and then, say a period of a year, to read and consider what is contained within the Harrow Characterisation & Tall Building Study (2021), and Tall Building Study (2024), Policy D9C (Tall buildings) of the London Plan (2021).</p> <p>As a resident and owner of a flat in a building within the Harrow & Wealdstone Opportunity Area where it states that “tall buildings may be appropriate”, there needs to be more explicit detail and criteria to reassure me that the impact, consequences, costs and benefits are considered all together in a balanced manner. Building further blocks of flats up to 7 storeys, such as at the Tesco site, after already converting the old Safari Cinema, will overshadow the several low rise buildings, houses and maisonettes which constitute the majority of the buildings in the area around Station Road. The loss of light for such a large community, including schools and residents, combined with the increased pressure on local services and infrastructure from increased population density, will have an overall adverse impact on quality of life and long-term cohesion and sustainability of the local community and infrastructure.</p>	<p>The evidence base is all publicly accessible information, and it, along with the draft local plan, is intended to be written in as plain English as possible. However, by its very nature some of the evidence base deals with technical matters, where writing in plain English is challenging. The Harrow & Wealdstone Opportunity Area Tall Building Study (2024) and Policy GR4 set out how tall buildings need to be developed in a manner that considers the wider context, specifically where there is much lower scale and density development.</p> <p>The timeframes set for local plan preparation has been set out in the Harrow Statement of Community Involvement (July 2023) and are consistent with that required by Regulations with respect to consultation periods.</p> <p>No proposed modifications</p>

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	<p>Design Considerations in section E need to be more explicitly defined for the impacted community so that Policy GR5 (Views Management) can be consulted on with impacted residents such as myself.</p> <p>Ref 2.4.6 – it feels like the Harrow & Wealdstone Opportunity Area is being used as a second class citizen to protect the interests of wider suburban Harrow, which I feel will cause this central part of Harrow to become further run-down and slum-like – I think there are already signs of such characteristics showing up on roads such as Station Road and Hindes Road.</p>	
Sunil Kapoor	<p>The Plan indicates that tall buildings are permissible in the Opportunity Area, the criteria used to identify appropriate locations for tall buildings considers their proximity to transport hubs, proximity to existing low-rise areas, and location relative to town centres. The Harrow and Wealdstone Opportunity Area Tall Buildings Study, page 96, shows the highest composite scores for tall building suitability were for sites adjacent to Harrow on the Hill Station and Harrow and Wealdstone Station. However, 12-storey buildings have been designated for sites behind these stations, while the Tesco site, with a lower composite score, has been allocated 15 storeys. This site is not in the Town Centre, lies close to a low-rise suburban area which is outside of the Opportunity Area, is not near a green space larger than 2 hectares, is farther from the train stations, has a relatively low PTAL, and is near one outlier tall building. The reason for this discrepancy is unclear.</p> <p>The Council's Tall Buildings Study identifies the Station Road sub area as unsuitable for tall buildings, yet the council permits buildings up to 18 storeys without clear justification. The Harrow and Wealdstone Opportunity Area Tall Buildings Study, gives Harrow Square as an example of unsuitably sited tall building which has created a wind tunnel and poor public realm amenities. Harrow and Wealdstone Heights in Wealdstone is also cited as a poor example of tall building. Given these past mistakes, is the council not doing the same by allowing tall buildings in areas they deem to be unsuitable?</p> <p>The council also claims to be retaining the human scale of Station Road, but the proposals are contradictory. Residents have expressed a desire for a maximum building height of 7 stories, in line with the study's findings.</p> <p>The method for determining these heights is not transparent, seeming to reflect developer requests rather than strategic planning.</p> <p>A proposed change is to reassess why the Tesco site is zoned for tall buildings.</p>	<p>The Tesco site has been considered against a set criteria / methodology within the Harrow & Wealdstone Opportunity Area Tall Building Study (2024), which has been applied across the wider Opportunity Area for consistency.</p> <p>No proposed modifications</p>
Carter Jonas LLP	<p>Policy GR4 (Building heights) builds upon Strategic Policy 01 by setting out that tall buildings will be directed to designated tall building zones within the Harrow & Wealdstone Opportunity Area. Within the Opportunity Area, a tall building is any building that is 7 storeys or 21m. Outside of the Opportunity Area, there are no designated tall building zones. There is additional text within the Regulation 19 Local Plan which requires tall buildings to provide a design rationale to demonstrate that a tall building is the most appropriate form of development for the site and its context. This additional requirement is supported as it accords with the aim of Chapter 12 of the NPPF to achieving well-designed and beautiful places.</p> <p>The proposals for Eastman Village include a number of buildings which would be considered tall buildings under Policy GR4, with existing planning permissions enabling the development of buildings up to 18 storeys in height. The Designated Tall Building Zones Map responds to</p>	<p>Noted</p> <p>No proposed modifications</p>

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	<p>this, with the entirety of Eastman Village located in an area deemed appropriate for buildings up to 18 storeys.</p> <p>Tall buildings such as those consented at Eastman Village will deliver a significant proportion of the Borough's housing and commercial requirements over the plan period. As such and given the limited availability of land within the Borough, it is considered that the Council's approach to supporting the development of tall buildings within designated zones is one which is appropriate and protects the more suburban character of other areas of the Borough. We therefore continue to strongly agree with the Council's approach to tall buildings within the Harrow & Wealdstone Opportunity Area only.</p>	
RAF Northolt	<p>Within the Tall Building Design Considerations policy, the MOD notes and welcomes the provision in section 2.4.11 "Located to the west of LB Harrow is RAF Northolt, whose operations rely on aircraft flying over Harrow Town Centre. As part of operations, safeguarding zones cover the borough and provide a threshold or circumstances as to when to consult with the Ministry of Defence (statutory consultee). The safeguarding thresholds are available on the Council's website"</p>	<p>Noted</p> <p>No proposed modifications</p>
Mayor of London	<p>Policy GR4 defines tall buildings as 21m in height, or 7 storeys, as measured from the ground level to the highest point of the building (excluding necessary plant and roof infrastructure). This definition aligns with Policy D9A of the LP2021. LBH has identified one area that may be suitable for tall building development in the Harrow and Wealdstone OA and corresponding appropriate building heights are set out within this. This is illustrated in the Designated Tall Building Zones Map in the draft Plan. LBH's approach to tall buildings is therefore consistent with the requirements of Part B of Policy D9 of LP2021. This map sets maximum appropriate heights for buildings in different zones. The term 'appropriate' building heights as set out within Policy D9 is preferred to 'maximum height'.</p> <p>The Mayor advises that maximum heights for tall buildings should be used sparingly where there is a clear constraint on development above a certain height. For example, this could be an aviation threshold or due to the impact on a protected viewing corridor. In light of this, LBH should amend instances where the use of the term 'maximum' heights or similar is used throughout the draft Plan.</p> <p>There are two strategic views that intersect with the borough and these are illustrated in Appendix 3. This should be replaced with a much clearer image and included in the main text of the draft Plan, so that it is easy to determine if a site lies within a strategic viewing corridor or not which will aid decision making.</p>	<p>Noted. References within the supporting text to 'maximum appropriate' heights are considered factual as they refer to the Harrow and Wealdstone Opportunity Area Tall Buildings Study, which uses that terminology. The policy itself does not refer to 'maximum'. The map at the end of the policy has been included for reference (and refers to 'maximum appropriate' heights but the policy itself refers to appropriate heights shown on the Policies Map (when produced).</p> <p>Proposed modification</p> <p>Amend the key on the map at the end of Policy GR4 Building Heights to as follows: 'Maximum appropriate Appropriate heights for tall buildings'.</p>
Leslie Coombes	<p>The Council's Tall Buildings Study identifies the Station Road sub area as unsuitable for tall buildings, yet the council permits buildings up to eighteen storeys without clear justification. The Harrow and Wealdstone Opportunity Area Tall Buildings Study, gives Harrow Square as an example of an unsuitably sited tall building which has created a wind tunnel and poor public realm amenities. Harrow and Wealdstone Heights in Wealdstone is also cited as a poor example of tall building. Given these past mistakes, is the council not doing the same by allowing tall buildings in areas they deem to be unsuitable?</p>	<p>The Harrow & Wealdstone Opportunity Area Tall Building Study (2024) sets out (Page 128, section 5.11) that the Station Road corridor is sensitive to tall buildings. Whilst growth should be encouraged along the corridor, it is predominantly unsuitable for tall buildings. This is due to the existing and intact parades and terraces, as well as protecting the amenity of the 2 storey residential houses to the east and west of the narrow corridor.</p> <p>However, the study also recognises that there are key sites along the Station Road corridor that are suitable for tall building development, and that development should</p>

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		<p>step down to considerately meet and reflect the existing heights surrounding the sites / opportunity area.</p> <p>The developments noted in the representation were permitted prior to the draft Local Plan, and the Council consider that Policy GR4 will assist in improving the design quality of future tall building developments.</p> <p>No proposed modifications</p>
<p>Rolfe Judd obo Tesco Stores Ltd</p>	<p>The designated Tall Building Zones Map on p.57 of the Draft Local Plan indicates that the site is suitable for development of up to 15 storeys. We understand that this threshold has been informed by a Tall Building Study (2024) which forms part of the Local Plan evidence base. This report has undertaken a suitability and sensitivity analysis across the Harrow & Wealdstone Opportunity Area, which has identified tall buildings zones, along with maximum appropriate building heights within them.</p> <p>This report confirms that the Tesco site offers an opportunity to make better use of land. At the centre of the site, there is opportunity for a maximum building height of 15 storeys, whilst the edges should be sensitive to the low-rise Station Road Parade and surrounding low-rise houses.</p>	<p>Noted</p> <p>No proposed modifications</p>
<p>Rolfe Judd obo Tesco Stores Ltd</p>	<p>Tesco supports the proposed wording of Policy GR4 and the proposed 15-storey threshold identified for the site on the following basis:</p> <p>A. The site does not sit within any of the protected viewing corridors identified by the London View Management Framework Supplementary Planning Guidance.</p> <p>B. 15 storeys on the site would be in line with the urban character of the Borough area and would respond to the existing townscape context within the Opportunity Area.</p> <p>C. Development of up to 15 storeys on the site would reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding. At present there is a 'gap' in street frontage owing to the surface car park servicing the superstore, proving an opportunity to create a new retail urban frontage and a continuation of the commercial uses along the key artery connecting the two town centres of Harrow & Wealdstone and Harrow-on-the-Hill.</p> <p>D. Tesco support the approach of focusing taller development towards the centre of the site, but there is an opportunity for a taller element on the corner of Station Road and Hindes Road to mark the junction. Planning application PL/0693/24 proposes a 12 storey building in this location and this is considered to be in-keeping with the street scene on the corner.</p> <p>E. The Safari Cinema site sits directly adjacent to the north-east corner of the application site. Planning permission ref. p/3043/19 was approved by LB Harrow in January 2020 for a cinema and 78 residential units, including an 11 storey element. This permission has been implemented and is currently under construction. The officers report for the approval acknowledged at paragraph 6.3.1 that <i>'It is inevitable that the character of the area will significantly change as a result of the high density of development proposed. However, the increase in density in this location is vital to support the wider regeneration of the Heart of Harrow Opportunity Area and its surrounding area through sustained economic growth and job creation'</i>.</p>	<p>Noted</p> <p>No proposed modifications</p>
<p>Savills obo Solum</p>	<p>Criterion a. of Policy GR4 confirms that tall buildings are to be directed to designated Tall Building Zones (TBZs) within the Harrow & Wealdstone OA. Criterion b. builds on this by stating that proposals shall not exceed the maximum appropriate heights as set out within</p>	<p>It is understood the site being referred to is Allocation OA11 – Car Park, Ellen Webb Drive. Policy GR4 is drafted based on the Harrow & Wealdstone Opportunity tall Building Study (2024), which is based on a methodology applied consistently across</p>

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	<p>the designated TBZs shown within the Policies Maps. Within the Draft Policies Map the site falls within an area earmarked for a TBZ for up to 12 storeys. Solum is of the view that this would be a wasted opportunity as it is not uncommon for tall buildings to front onto railway lines as there are no concerns relating to amenity.</p> <p>Furthermore, it should be noted that the site lies c.100m east of the Harrow Crown Court site which is also earmarked for a TBZ but for buildings up to 18 storeys. Therefore, a building tantamount to this on the Station Car Park site would not look out of place. In fact, there is an opportunity to create a gateway / landmark feature into Harrow & Wealdstone from the north, as well as a cluster of tall buildings, by removing the rudimentary limitations placed upon the maximum height on the site.</p> <p>Section 5.8 of the Tall Buildings Study raises concerns about the width of the site, stating that the width is also limiting for tall buildings, measuring 30m at its widest point. Solum refute this unsubstantiated remark which is not justified by any commentary or evidence. There is a plethora of tall buildings on similar sized sites across London.</p> <p>It is respectfully requested that the TBZ covering the site be increased to allow for buildings of c.18 storeys high rather than up to 12 storeys. In this context, it is worth noting that any tall building proposal for the site would be thoroughly tested at the pre-application stage, in consultation with the Council and other key stakeholders, to demonstrate that it is appropriate for the site and surrounding area.</p> <p>Solum is confident that buildings taller than 12 storeys can sit comfortably on the site; delivering a wide range of planning benefits for the site and the surrounding area. As currently drafted the emerging Local Plan would cap buildings heights below what Solum thinks is achievable. This would impact the viability of any potential development as there are limited opportunities to deliver a greater quantum at lower levels. This in turn would limit the associated benefits that could be delivered.</p> <p>A more flexible approach to the maximum storey height allowed within the TBZ doesn't necessary mean that all buildings will be delivered up to this level, it just gives the option for taller buildings if it can be demonstrated that they are appropriate in planning terms. We therefore request that no rudimentary limitations are placed upon the maximum height which would allow for allow for a design led approach.</p>	<p>the Opportunity Area for setting appropriate heights. No evidence has been submitted with the representation to justify any departure from the evidence base.</p> <p>No proposed modifications</p>
Savills for Unibar	<p>This policy does not take into account the strategic designed approach indorsed by Policy 01: High Quality Growth. Policy GR4 sets out a blanket approach which will sterilise the development opportunities of appropriate sites not situated within tall building zones. Accordingly, this policy should be amended as follows:</p> <p>A. Tall buildings are directed to designated tall building zones within the Harrow & Wealdstone Opportunity Area. Within the Opportunity Area, a tall building is any building that is 7 storeys or 21m from the ground level to the highest point of the building (excluding necessary plant and roof infrastructure).</p> <p>B. Proposals shall not exceed the appropriate building heights as set out within the designated tall buildings zones shown within the Policies Maps.</p> <p>C. The Council will restrict proposals for tall buildings outside the identified tall building zones, unless supporting evidence is submitted to demonstrate visual coherence with the surrounding character.</p>	<p>The suggested modification is considered unnecessary and would be fail to be in general conformity with the requirements set out in Policy D9 of the London Plan (2021).</p> <p>No proposed modifications</p>

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	D. Outside of the Harrow & Wealdstone Opportunity Area, there are no designated tall building zones. A tall building is any building that is 7 storeys or 21m from the ground level to the highest point of the building.	
Sunil Kapoor	<p>The Plan indicates that tall buildings are permissible in the Opportunity Area, the criteria used to identify appropriate locations for tall buildings considers their proximity to transport hubs, proximity to existing low-rise areas, and location relative to town centres. The Harrow and Wealdstone Opportunity Area Tall Buildings Study, page 96, shows the highest composite scores for tall building suitability were for sites adjacent to Harrow on the Hill Station and Harrow and Wealdstone Station. However, 12-storey buildings have been designated for sites behind these stations, while the Tesco site, with a lower composite score, has been allocated 15 storeys. This site is not in the Town Centre, lies close to a low-rise suburban area which is outside of the Opportunity Area, is not near a green space larger than 2 hectares, is farther from the train stations, has a relatively low PTAL, and is near one outlier tall building. The reason for this discrepancy is unclear.</p> <p>The Council's Tall Buildings Study identifies the Station Road sub area as unsuitable for tall buildings, yet the council permits buildings up to 18 storeys without clear justification. The Harrow and Wealdstone Opportunity Area Tall Buildings Study, gives Harrow Square as an example of unsuitably sited tall building which has created a wind tunnel and poor public realm amenities. Harrow and Wealdstone Heights in Wealdstone is also cited as a poor example of tall building. Given these past mistakes, is the council not doing the same by allowing tall buildings in areas they deem to be unsuitable?</p> <p>The council also claims to be retaining the human scale of Station Road, but the proposals are contradictory. Residents have expressed a desire for a maximum building height of 7 stories, in line with the study's findings.</p> <p>The method for determining these heights is not transparent, seeming to reflect developer requests rather than strategic planning.</p> <p>A proposed change is to reassess why the Tesco site is zoned for tall buildings.</p>	<p>Tall building zones have been designated following the Harrow & Wealdstone Opportunity tall Building Study (2024), which followed a methodology to identify tall buildings zones and appropriate heights. Any developments proposing tall building would still require relevant assessments at planning application stage to demonstrate their acceptability.</p> <p>The examples cited were delivered prior to the current evidence base and draft Policy GR4.</p> <p>The Harrow & Wealdstone Opportunity Area Tall Building Study (2024) sets out (Page 128, section 5.11) that the Station Road corridor is sensitive to tall buildings. Whilst growth should be encouraged along the corridor, it is predominantly unsuitable for tall buildings. This is due to the existing and intact parades and terraces, as well as protecting the amenity of the 2 storey residential houses to the east and west of the narrow corridor.</p> <p>However, the study also recognises that there are key sites along the Station Road corridor that are suitable for tall building development, and that development should step down to considerately meet and reflect the existing heights surrounding the sites / opportunity area. The Tall Building Study (2024) sets out appropriate site movements, and Policy GR4E(a) explicitly refers to the wider context.</p> <p>No proposed modifications</p>
Sunil Kapoor	<p>The aesthetic of the area does not suit buildings of 15 stories or even 18 stories and planning permission has been granted for these on station road in the past.</p> <p>Recommendation: review the height permits granted to be commensurate to the area</p>	<p>The Harrow & Wealdstone Opportunity Area Tall Building Study (2024) sets out (Page 128, section 5.11) that the Station Road corridor is sensitive to tall buildings. Whilst growth should be encouraged along the corridor, it is predominantly unsuitable for tall buildings. This is due to the existing and intact parades and terraces, as well as protecting the amenity of the 2 storey residential houses to the east and west of the narrow corridor.</p> <p>However, the study also recognises that there are key sites along the Station Road corridor that are suitable for tall building development, and that development should step down to considerately meet and reflect the existing heights surrounding the sites / opportunity area. The Tall Building Study (2024) sets out appropriate site movements, and Policy GR4E(a) explicitly refers to the wider context.</p> <p>No proposed modifications</p>
Places for London	The general tenor of our representations have not been addressed. We maintain them ie. that restricting locations where tall buildings may be potentially appropriate to designated tall buildings zones within the Harrow and Wealdstone OA area only is unduly restrictive and may	The spatial strategy and evidence identify the Harrow & Wealdstone Opportunity Area as the most appropriate location for tall building development. Policy GR4 does not

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>not enable the optimisation of site capacity and development opportunities within the borough, particularly the delivery of much-needed housing, in well-connected and sustainable locations such as those close to transport hubs and town centres.</p> <p>We support the amendment to GR4B to ensure conformity with the London Plan (ie. deletion of reference to ‘maximum’ building heights).</p> <p>We consider that the additional sentence added in the middle of paragraph 2.4.1 should be amended in order for it to be sound and accord with national and London-wide planning policies and guidance. We are not aware of any requirement for tall buildings to be “<i>the most appropriate form of development</i>” for a site, only that it should be an appropriate one in accordance with an up-to-date development plan and other material considerations. We suggest the following modification to make the Local Plan sound:</p> <p>Proposals for tall buildings should provide a design rationale to demonstrate that a tall building is an the most appropriate form of development for the site and its context.</p> <p>We support the amendment to the second to last sentence to paragraph 2.4.1 by the deletion of reference to “<i>maximum</i>” building heights.</p> <p>We also recommend that the following text should be included either in Policy GR4 or the supporting text: Appropriate height levels within tall building zones should be established via a comprehensive design-led process at pre-application stage to ensure that the development capacity of the site is optimised and fully tested in line with the London Plan.</p>	<p>include an explicit objection in principle to tall buildings outside of the designated areas where planning benefits may merit support.</p> <p>References to ‘to most appropriate’ in paragraph 2.4.1 are considered suitable as it provides clarity as to what is required to justify tall buildings relative to other building typologies.</p> <p>References within the supporting text to ‘maximum appropriate’ heights are considered factual as they refer to the Harrow and Wealdstone Opportunity Area Tall Buildings Study, which uses that terminology. The policy itself does not refer to ‘maximum’. The map at the end of the policy has been included for reference (and refers to ‘maximum appropriate’ heights but the policy itself refers to appropriate heights shown on the Policies Map (when produced)).</p> <p>No proposed modifications</p>
Places for London	<p>Our suggestions have not been incorporated in the amended map designations and we maintain our representations. In particular the building heights specified on the Local Plan Policies map should not be expressed as a maximum number of storeys; this change would accord with the changes made to policy GR4B and paragraph 2.4.1 (see above) and, importantly, there is no justification for the heights provided within the evidence base (see our Regulation 18 representations to the left).</p> <p>Similarly, the word “<i>maximum</i>” also needs to be removed from the legend to the Designated Tall Building Zones Map at page 57, so this also reads as “<i>appropriate</i>” heights for tall buildings.</p> <p>There may be other instances in the draft Plan where the use of the term “<i>maximum</i>” heights or similar should also be amended.</p>	<p>Policy GR4 is in general conformity with the London Plan (2021). The policy sets out a height definition and maps areas that have been zoned as appropriate for tall buildings. The definition is set out in floors, with typical floor to ceiling heights set out in the supporting text (Para 2.4.9).</p> <p>The appropriate heights set out in the Harrow & Wealdstone Opportunity Area Tall Building Study (2024) sets out methodology for identifying tall building zones and appropriate heights. This is an accepted approach as found sound in multiple Local Plans across London.</p> <p>The map at the end of the policy has been included for reference (and refers to ‘maximum appropriate’ heights but the policy itself refers to appropriate heights shown on the Policies Map (when produced)).</p> <p>No proposed modification</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>The essence of this policy is that no tall buildings are to be allowed anywhere in Harrow outside the Harrow and Wealdstone Opportunity Area. That being the case the policy can be substantially simplified and does not need six parts. The operation should produce specific policies for the Harrow and Wealdstone opportunity area, and All of the tall building zones should clearly be set out that policy document. Policy GR4 can therefore be mainly deleted.</p>	<p>The policy is in general conformity with the London Plan (specifically Policy D9) and refers to Harrow specific matters. Policy zones are clearly set out in the map within the supporting text and also will be detailed within policies maps.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Home Builders Federation	<p>The policy is unsound because it is unjustified. The Council declares that only the Harrow & Wealdstone Opportunity Area is suitable for tall buildings. Outside of this, paragraph 2.4.6 observes that two storey development is typical in the borough and therefore development at heights greater than this is likely to be unacceptable.</p> <p>This is contrary to a principle aim of the London Plan which is to encourage ‘incremental densification’ on previously development land (see paragraph 4.2.4 of the London Plan). This is a critical component of the London Plan to enable London to achieve its housing needs (52,000 net additions a year, now risen to 62,000 a year reflecting the backlog). Restricting all new development to two stories will limit the ability to intensify brownfield sites to optimise housing delivery.</p> <p>We are not suggesting that everywhere in the borough should be defined as appropriate for development of seven stories or more, but the Plan needs to be more positively worded to encourage developments of, say, 3-4 stories in more areas, particularly those located within 800m of tube and train station or district centres, or within PTAL 3-6. See in particular, London Plan policy H1, B, 2 which states:</p> <p>2) optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:</p> <p>a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary</p> <p>The policy, as worded, is insufficiently positive, and is contrary to the London Plan as it will serve as a constraint on residential development.</p>	<p>Para 2.4.6 states <i>Outside of the Harrow & Wealdstone Opportunity Area, Harrow as a borough is comprised largely of a suburban character, which consists of generally two storey residential buildings. Interspersed are predominantly local or district centres, which are also characterised with modest heights. The Harrow Characterisation & Tall Building Study (2021) clearly sets out that much of the character is comprised of residential areas of two storeys in height, and identifies that buildings that would meet the tall building thresholds as set out in the London Plan are unlikely to be acceptable across much of suburban Harrow.</i></p> <p>The representation misquotes the draft Local Plan, which does not state that heights above two-story would likely be unacceptable (just those that represent tall buildings as defined by the London Plan). All new development must take a design-led approach to ensure that height, among other matters, is appropriate for its context. There is no policy within the draft Local Plan that seeks to restrict new development to two-stories.</p> <p>No proposed modifications</p>
Historic England	<p>We support criteria GR4.B and would query if it could be strengthened and include a caveat about the appropriate heights not being automatically acceptable and still requiring a full assessment of effects in line with policy. We also suggest that it is made clear, as per the Harrow and Wealdstone Tall Buildings Study (2024), that only a minority of buildings within the tall building areas should reach the maximum appropriate height indicated. For example, <i>‘Applicants should not assume that any height up to that stated is automatically acceptable. Proposed appropriate heights remain subject to a full design assessment at the point of application and only a minority of buildings within the tall building areas should reach the maximum appropriate height indicated. Proposals shall must not exceed the appropriate building heights as set out within the designated tall buildings zones shown within the Policies Maps.’</i> (Note it may be that these are better as separate policy criteria, perhaps with the point re. acceptable heights being integrated into GR4.E. It may also be that some of this requires consideration in Strategic Policy 01).</p>	<p>This is captured in part E of the Policy and paragraph 2.4.2.</p> <p>No proposed modifications</p>
Historic England	<p>Policy GR4.C Building Heights</p> <p>To improve clarity, we suggest that ‘restrict’ is replaced with ‘resist’ or ‘will not support’. Otherwise, clarification of what restrictions there will be is needed.</p>	<p>The wording is considered appropriate and has been informed by experience in other boroughs and discussion with the GLA.</p> <p>No proposed modifications</p>
Historic England	<p>Policy GR4.E.b Building Heights and para. 2.4.11</p> <p>We welcome the inclusion of criteria GR4.E.b, which seeks to safeguard protected views. However, management of heritage assets, views and townscape is overlapping, and we</p>	<p>Noted and agreed.</p> <p>Proposed Modification</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>advise that the need to consider all three is mentioned here. A similar expansion of para. 2.4.11 would be welcome.</p> <p>As a point of accuracy, please note that 'local heritage views' is a misnomer and would, in our view, be best replaced. My inference is that this policy seeks to refer to 'protected views and vistas', and the landmarks, local heritage assets, etc., within them.</p>	<p>Amend GR4 (E) (b) as follows: 'The protection and preservation of local heritage views-protected views, vistas and landmarks, having regard to Policy GR5 (Views Management), and RAF Northolt Safeguarding Zones (set out on Policies Maps); and'</p>
Historic England	<p>Policy GR4 Building Heights, Supporting Text, Para. 2.4.8</p> <p>We welcome and support the requirement in para. 2.4.8 that all new tall buildings '<i>must be of exemplary design</i>'. In fact, we consider it to be a really critical requirement (that would support the ambition of Strategic Policy 01) and we recommend that it is elevated to the main policy at GR4.E.</p>	<p>Noted and agreed as it would provide clarity and consistency between the policy and supporting text. This would also assist in general conformity with Policy D9 of the London Plan.</p> <p>Proposed modification</p> <p>Amend Part GR4E as follows:</p> <p>a. Would be appropriate for both the application site and the wider context, especially where a proposal may impact areas of significantly lower density and height;</p> <p>b, would be of an exemplary design;</p> <p>b c. The protection and preservation of local heritage views, vistas and landmarks, having regard to Policy GR5 (Views Management), and RAF Northolt Safeguarding Zones (set out on Policies Maps); and</p> <p>c d. Address matters in relation to the safety of occupiers and any mitigation required.</p>

Policy GR4a - Basement Development

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	<p>If basements comply with GR4AA sub-criteria a,b,d and g then it does not matter how far the basement extends to into the rear garden. Criteria BNC are unreasonably punitive given that compliance is required with all the other criteria in this part of the policy and the policy as drafted will represent an unreasonable restriction on development.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>There is a clear difference between part Ab and Ac, as the amenity space can be within the front garden as well as the rear garden, and therefore the policy as drafted addresses the impact on this.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>In addition it is not clear what Independent Housing is where it is referred to in GR4AB. Does it mean private sector housing, detached housing, or C4 housing, all of which may be independent, depending on its context. Even if it were to apply to these forms of housing no rationale has given as to why this should be so and this criterion is confusing and makes the policy unworkable.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Policy GR4.B seeks to ensure that basements do not become self-contained units that are no longer ancillary accommodation to the principal dwelling; this is elaborated on and justified in paragraph 2.4.17. Policy could however be amended for clarity and consistency.</p> <p>Proposed modification</p> <p>Amend Part B as follows: Basement proposals for independent housing self-contained homes will not be supported.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	We note the introduction of this new policy. An additional condition needs to be added to part A ‘ does not adversely impact on sub-surface transport or utilities infrastructure ’ The supporting text should include a requirement to consult with the owners or providers of sub-surface infrastructure to ensure that the proposed works do not have any adverse impacts either during construction or when completed.	This is a general requirement, not specific to basements. No proposed modifications
TfL	The requirement in part Ag to ‘Continue to provide for appropriate landscaping and parking provision within the front garden’ should be amended to remove reference to parking provision as shown.	Parking provision may be appropriate in some parts of the borough, it is not necessary to duplicate Policy M2. No proposed modifications
Historic England	Policy GR4A: Basement Development, Supporting Text, para. 2.4.1.6 & 2.4.19 We welcome that the supporting text to Policy GR4A refers to the historic environment. However, the key heritage concern in relation to basements will be the potential impact of construction on archaeological remains. We therefore recommend that a sentence is added (perhaps at para. 2.4.19?) which highlights this. The new text should explain that any basement proposals within an Archaeological Priority Area (APA) will need to undergo consultation with the Greater London Archaeological Advisory Service (GLAAS) and be accompanied by a desk-based assessment. Alternatively, a cross-reference to the requirements of HE1.H could be added (provided that HE25 is actioned).	Noted and agreed. Proposed Modification Add new Para 2.4.20: Proposals for new basements within an Archaeological Priority Area (APA) should be consulted on with the Greater London Archaeological Advisory Service (GLAAS) and where appropriate be accompanied by a desk-based assessment. Renumber remaining paragraphs accordingly.

Policy GR5 – View Management

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
LB Brent	We note that the protected views identified in Appendix 3 will be safeguarded in accordance with the Harrow Views Management Guidance (2024) and Policy HC4 (London Views Management Framework) of the London Plan (2021). Draft Policy GR5 states: <i>‘B. Where there is a protected view: a. Development within a Protected Views Restricted Corridor (shown in red) that exceeds the specified threshold height will be refused; and b. Development in the Protected Views Setting Corridor (shown in yellow) should form an attractive element in its own right and preserve or enhance the viewers’ ability to recognise and to appreciate the landmark.’</i> We note that that Protected Views Restricted Corridors do not extend into the Borough of Brent. However, two Protected Views Setting Corridors extend into the Borough of Brent: Protected Views Setting Corridor: Old Redding This extends into the north western edge of Brent including part of the Northwick Park Growth Area, beyond which are views towards Wembley and Central London. Planning permission, partly in outline and partly detailed, has already been granted for development within this growth area. The Brent Local Plan includes Policy BNWGA1A: Northwick Park Growth Area which highlights that, although subject to transformational change, the scale of development will need to respond positively to its surrounding context, particularly with regards to building heights. We consider that the proposed Protected Views Setting Corridor is compatible with the redevelopment aspirations set out within the Brent Local Plan.	Noted No proposed modifications

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>Protected Views Setting Corridor: Football Lane This extends across the North Wembley and Preston areas within Brent towards Wembley Park. The Harrow Views Management Guidance (2024) states that it is possible to gain impressive panoramic views over the ridgelines of the Harrow School buildings towards central London and also including Wembley Stadium. Key landmarks in the background to the view include Wembley, the Shard, Post Office tower, and Canary Wharf. We consider that the proposed Protected Views Setting Corridor is compatible with the policies set out within the Brent Local Plan which promote the continued regeneration of Wembley to include additional high quality, tall buildings. Tall buildings between this viewing point and Wembley Stadium would be viewed as part of a cluster of modern development within a dense urban setting close to Wembley stadium, behind which longer distance London views would continue to be appreciated.</p>	
Places for London	<p>We maintain that some development could moderately exceed the ‘restricted corridor’ red line whilst also preserving the view of the silhouette of St Mary’s Church and its setting, particularly noting the urban context and ‘canyon’ view and development in the foreground, which already exceeds the red line threshold. We therefore suggest the following modification to the wording of policy GR5 Part B.a in order to enable development and make the Local Plan sound:</p> <p>Development within a Protected Views Restricted Corridor (shown in red) that exceeds the specified threshold height will be refused. should preserve and enhance the viewer’s ability to recognise and to appreciate the landmark in these views.</p>	<p>Proposed amendment would not be in general conformity with Policy HC4 (London View Management Framework) of the London Plan (2021)</p> <p>No proposed modifications</p>
Places for London	<p>We question the insertion of “<i>maximised</i>” in paragraph GR5 G, which suggests that “<i>opportunities to create new local views and vistas</i>” would be accorded more weight in the planning balance than is appropriate. While local views and vistas can be a planning consideration, it would not be appropriate to ‘maximise’ this at the potential expense of other important planning considerations such as eg. optimisation of development, good design, and the delivery of new homes and jobs.</p>	<p>It is acknowledged that the word ‘maximised’ in this instance suggests a hierarchy of planning considerations whereas the plan needs to be considered as a whole.</p> <p>Proposed modification</p> <p>Amend Part G as follows: ‘Opportunities to create new local views and vistas should be maximised secured through the design and layout of new development.</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>This policy should be combined with tall buildings. As tall buildings are not intended to be allowed anywhere other than the Opportunity Area there is no need to protect buildings that lie outside the opportunity area because tall buildings cannot come forward. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Development outside of the Harrow & Wealdstone Opportunity Area and outside of the designated tall building zones may still impact protected views. The development plan does not explicitly ban on tall building outside of designated tall building zones.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>The framework for controlling views in London is provided by policy HC 4 of the London Plan, and policy GR5 adds nothing to it. Repeating policies adds unnecessary complexity to an already complex policy landscape which will make the Plan harder to use and less effective. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Policy HC3 (Strategic and Local Views) of the London Plan (2021) requires boroughs designate views, and to use the principles of Policy HC4 for the designation and management of local views. Policy GR5 seeks to provide a policy basis for the designation of local views (and shown on planning policies maps) and to assist in the management of them.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	<p>In addition part of this policy imposes a duty to positively enhanced views. Not even conservation areas do this and only require that schemes have a neutral impact or better. No justification has been provided for this additional step to be taken of requiring a positive impact arising from development within a protected view as opposed to development which does not cause harm.</p> <p>This is unreasonably onerous and will provide an additional check on development coming forward. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Policy HC4 of the London Plan (2021) seeks development proposals to make a positive contribution and to enhance peoples experience of the view. Policy GR5 is consistent with this approach.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>This policy should be deleted as it adds nothing to the London Plan policy HC4 and should be combined with policy GR4 in respect of tall buildings where it would sit more comfortably with less repetition and complexity.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Development outside of the Harrow & Wealdstone Opportunity Area and outside of the designated tall building zones may still impact protected views. The development plan does not explicitly place a ban on tall building outside of designated tall building zones</p> <p>No proposed modifications</p>
Historic England	<p>Protected views are managed and assessed in relation to their visual amenity (meaning the overall pleasantness of the views they enjoy of their surroundings) to people. Heritage assets and townscape contribute to visual amenity, and an understanding of their value to the view (acquired from the relevant baseline and assessments) should be made clear in the visual impact assessment. However, protected views may also be important to understanding and appreciating the significance of heritage assets. Visual impact assessments do not assess the effect of the proposed development on the significance of the heritage asset in the view. A separate Heritage Impact Assessment (HIA) is required for that, in the same way that a separate townscape assessment is needed to understand the effect of development of the value of any townscape in the view. In other words, change to a protected view from, or of, a heritage asset (e.g. St Marys Church and Harrow on the Hill Conservation Area) should trigger the need for a separate HIA, in addition to a visual impact assessment (and potentially a townscape assessment if there's townscape in the view).</p> <p>We believe that it is important to draw this point out in the policy and supporting text to GR5, because the purpose of the three assessments is often misunderstood and conflated, leading to inadequate information being provided to decision-makers. This can lead to unintended consequences and be particularly detrimental in terms of delivering sustainable development, as change that may be acceptable in relation to visual amenity or townscape, may not be in heritage terms. This is particularly relevant to para. 2.5.3 which discusses how new development can enhance views and townscape.</p> <p>A good place to make the suggested edit, could be after para. 2.5.1. which says: '<i>...views towards Harrow on the Hill and St. Mary's Church reinforce the historical and cultural importance of that place.</i>' This is correct. But the point could also be made here that views are also important protected views of (or from) heritage assets are part of their setting and contribute to their significance or the appreciation of their significance. Therefore, an HIA is also required.</p>	<p>This policy deals specifically with the management of views through the borough. The heritage value of assets is covered in other policies.</p> <p>No proposed modifications</p>

Policy GR6 – Areas of Special Character

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Hertsmere Borough Council	A large area of the north of the borough is identified as an Area of Special Character and this includes open areas adjacent to Bushey Heath. Part of Bushey Hill Pastures itself extends into Harrow as documented in our own published Landscape Sensitivity Assessment (Landscape Character Area – P.14). We support the overall scope of Policy GR6 and would suggest the supporting text acknowledges this important landscape extends into Bushey Heath.	Noted. Paragraph 2.6.3 identifies area of special character extends into Hertsmere Borough Council No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	This policy should be deleted. It seeks to incorporate a planning policy that imposes Conservation Area levels of protection on areas that are of insufficient quality to be designated as conservation areas. Conservation Areas have existed since 1968 and therefore by now, all those areas that are worthy of such a designation will have been identified and designated. It is ownerless and unreasonable to apply default conservation area status over wide areas of the Borough that are not subject to the same scrutiny and same policy standards that are required when conservation areas are designated. This approach does not reflect government policy, and will restrict development coming forward in one of the few locations of ordinary townscape where development can come forward, free from conservation and other heritage designations. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Areas of Special Character reflect the overall structure of the borough with respect to the distinction between suburban / urban built up areas and the elevated, more rural and / or historic landscapes and the views they offer to and from them. A Conservation Area exists to protect the special architectural or historic interest of a place. Policy GR6 provides the policy mechanism to manage Areas of Special Character and not be conflated with the Historic Environment No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	If an area has a character which is worthy of preservation enhancement, then it should be designated a conservation area. The production of a local plan is the correct opportunity in which to assess whether such areas qualify for that status and if they are then they should be so designated if justified and appropriate. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Areas of Special Character reflect the overall structure of the borough with respect to the distinction between suburban / urban built up areas and the elevated, more rural and / or historic landscapes and the views they offer to and from them. A Conservation Area exists to protect the special architectural and historic interest of a place. Policy GR6 provides the policy mechanism to manage Areas of Special Character and not be conflated with the Historic Environment. Heritage considerations are set out within Chapter 3 of Local Plan. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Allowing a policy in the local plan which will give the LPA carte blanche to identify areas of a special character on an unregulated basis with no policy support from either national policy or specialist Heritage sourced such as Historic England. This will result in onerous planning policies being applied to areas and obstruct development coming forward where it must, if planning policy targets or to be met. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Areas of Special Character are set out in the current Harrow Local Plan (2013), and are proposed to be carried over into the New Local Plan (2021-2041). It does not set out the criteria for, or identify new areas of special character. New areas of special character would have to be introduced through a criteria based approach and consulted upon in accordance with the Harrow Statement of Community Involvement. No proposed modifications
Home Builders Federation	The policy is unsound because it is unjustified and insufficiently positively prepared. The draft policy aims to control the character of development within the areas defined by the Council as 'Areas of Special Character'. Unlike conservation areas this is a local designation created by the Council to restrict development. The map of page 66 indicates that this is quite an extensive designation that is enjoyed, unsurprisingly, by some of the least deprived	Policy GR6 does not provide a presumption against development, rather managing development to ensure the special character as identified is not harmed. It is not appropriate to refer to a single form of development within the policy (such as only residential).

	<p>residents living in Harrow (see map of deprivation on page 20). It also means that some important, sizeable parts of the borough, like south Harrow, Hatch End and Pinner, will be excused from making any meaningful contribution to housing supply even though there are tube stations and district centres located here – areas that are a high priority in the London Plan in order that they make a contribution to housing supply (see London Plan policies especially GG2, C and H1, B 2).</p> <p>The wording of the policy is ambivalent in terms of to what extent housing will be supported by the Council in these areas. The policy needs to be re-drafted to provide a better steer for development - assuming that the Council does support the principle of residential development at these locations. It is important that development, not just minor residential development, can be supported in these locations. This will be achieved through the intensification of brownfield land near train, tube and district centres, subject to close attention to building heights and other design considerations.</p>	<p>No proposed modifications</p>
Historic England	<p>We would query the reference to substantial harm here as (per HE6), it is a high test. Therefore, it may be beneficial to reconsider this wording.</p> <p>Separately, please note that we welcome the supporting text at para. 2.6.8 and 2.6.10.</p>	<p>Noted and agreed that this could be reworded as whilst large parts of Areas of Special Character include heritage assets, the designation itself is not limited to heritage considerations (nor is it a heritage designation) and therefore reference to harm could potentially be misconstrued. Impact on any heritage assets within the areas would be assessed against the relevant heritage policies in the Plan.</p> <p>Proposed modification</p> <p>Amend Part C as follows: ‘Proposals that would <u>substantially harm have an unacceptable impact upon an area of special character, or its setting, will be refused</u></p>

Policy GR7 – External Lighting

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	<p>This policy pulls in two different directions at the same time. It seeks to heavily control the location and amount of illumination while requiring development to incorporate external lighting which at the same time should be designed to mitigate wider harm. Mitigating wider harm is not defined or explained anywhere in the policy, which becomes an onerous and unreasonable objective for applicants to attempt to achieve. All of the criteria set out in parts A,B,N and C are all better located in specific policies dealing with residential amenity or biodiversity.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Paragraph 2.7.6 sets that in determining the appropriateness of external lighting, the Council’s Environmental Health Department will appraise lighting strategies submitted with planning applications to determine their appropriateness. Applicants should refer to the Institution of Lighting Professionals; Guidance Note 01/21 (The Reduction of Obtrusive Light) or any subsequent iteration.</p> <p>The policy is considered a sound response to the need to provide external lighting in new development but ensuring that in doing so, any impacts of this on the wider area is considered and mitigated.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>That is an error in policy GR7 as there are two part A’s. The second part A deals with lighting at sporting facilities. This policy would be better located in the specific sports policy S5. In addition it is not clear how lighting impacts upon the character of open land. Land is open because it is not built on, not because it is illuminated. Unless the object of this policy is to control the design of lighting gantries and pylons, it is not clear why character of open land has been imported as a criterion into this policy. If floodlighting is proposed on open land which is used for sporting facilities, then the character of land will not change because it’s continue sporting use will not be altered by the lighting.</p>	<p>Many of the outdoor sport facilities within the borough require floodlighting. This policy is seeks to ensure that appropriate level of floodlighting is required to meet the needs of the particular sport with an appropriate amount of paraphernalia. Furthermore, this needs to be balanced against the impacts on other matters set out in the policy through illumination levels and light spill.</p> <p>Noted and agreed with respect to numbering.</p>

	The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Proposed amendment: Amend the second paragraph 'A' to 'B'
Environment Agency	We are pleased to see the updates made to these policies since our last response.	Noted No proposed modifications

Policy GR8 – Shopfronts & Forecourts

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
The Pinner Association	Advertisements for shopfronts must accord with the requirements set out in Policy GR9 (Outdoor Advertisements, digital displays and hoarding) and any supplementary planning documents, specifically in relation to Conservation Areas	Noted No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	This policy contains 15 separate parts and is too complex and detailed for what is very minor development. It also raises issues to do with security, heritage and advertising which are better dealt with in other specific subject base policies. This will avoid duplication, avoid complexity and confusion and make the plan easier to navigate and use. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	The policy as drafted addresses the material considerations that arise from such development. No proposed modifications

Policy GR9 – Outdoor Advertising, digital displays and hoardings

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	Criterion F is particularly onerous and unworkable. Apart from the situation where surveillance equipment is present, how will applicants know what proposals there are for future surveillance equipment, which presumably are not in the public domain. Also, how do adverts relate to public perception of security? The relationship is too obscure to be demonstrated, these criteria make the policy unworkable. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Proposals for new surveillance equipment may be proposed as part of nearby / adjacent development. A review of relevant nearby planning permissions will determine this. Inappropriately located and scaled advertisements / hoardings can cause areas to be screened which may result in areas that are unable to be surveyed by users of the area. No proposed modifications
Greg Dowden	Criteria H and I are redundant because these matters are covered by other criteria in particular A, B, C and D. It's not clear why advertisements need to contribute to the safety of the environment. It is reasonable that advertisements do not harm safety or make matters worse, but this criterion imposes a duty to make improvements. This approach is not supported in the NPPF or NPPG and adds uncertainty to the application of the policy make it difficult to comply with. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Policy GR9A h and i provide specific policy in relation to types of infrastructure that are becoming more prevalent within the borough, and therefore policy provides appropriate management of such development in relation to their number and scale. No proposed modifications

Policy GR10 – Infill & Backland Sites

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	Although we welcome the addition of a reference to Policy M2, the wording should be further amended as shown because car parking standards already reflect the scale of development.	Proposed Modification

	'Appropriate levels of car parking is provided in line with Policy M2 commensurate to the scale of development , with servicing and refuse collection adequately addressed.	Amend Part Ae as follows: 'Appropriate levels of car parking is provided in line with Policy M2 commensurate to the scale of development, with servicing and refuse collection adequately addressed.'
Home Builders Federation	Part A, b is unsound because it is negatively worded. Part A, b states: Proposals assist in the delivery of homes as demonstrably needed [Strategic Housing Policy 03]. It is unclear what the Council means by this sentence, and it does not appear to be explained in the supporting text. We suspect that the intention might be to try and control residential development if targets have been met in any one year, or possibly the last three (perhaps based on the Housing Delivery Test). This may not be the council's intention, but a more positively worded policy would not dispute the need for housing, although it might wish to establish the rules and conditions for such development on infill and backland sites. The sentence in part B is unnecessary and should be deleted.	SP03 sets out the types of housing that are required within the borough, and this should be starting point for any new residential development. Policy GR10 reference to SP03 is to ensure new development considered under GR10 assists in delivery of the types of homes needed. It is considered that the drafting of the Policy GR10 does not set a cap on housing numbers. Housing targets within the Plan are expressed as minimums. No proposed modifications
Rajan Patel	I would urge the Council to drop the garden land SPD as its unique among all London LPA that do not have this limitation. I agree a site should be assessed under its own scope and merits but the Garden Land SPD creates uncertainty on redevelopment for small sites as a small house on a large plot even in an urban built up area next to PTAL 4, 5 or 6 would be restricted to just increasing 20% of so above the original footprint. I have secured and built out over 12 small sites in Kingston ranging from 6 to 9 flats on each site, and contributing over 80 new builds for the Borough in 4 years all of high quality, with most having 50% plus family accommodation as the increase in footprint is not limited to a generic assessment but rather to each sites own capacity. I attached an example of a school cottage plan approved in Kingston and now under construction - this was one small house of 65m2 on a decent plot and now accommodates 7 flats, 4 of which are 3 beds. The original footprint would have been no more than 35m2 and on the ground floor alone the new footprint is some 150m2 - this would not be permitted under the 2013 SPD and yet the scheme is approved in Kingston and next to schools, shops, park and public transport. I hope this can be further reviewed in due course as for small sites the garden land SPD is very limiting and removing it means there will be more scope to make better use of small sites in harrow as they also need to be viable under costs inflation and the schemes can then be assessed on their main merits of quality, design etc rather than limitation of % increases of footprints irrespective of plot sizes in urban areas.	The Garden Land Supplementary Planning Document (2013) does not form part of the Local Plan nor is part of the Regulation 19 Consultation. No proposed modifications

Policy GR11 – Planning Obligations

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	Although we welcome the addition of a reference to public transport this should be included alongside affordable housing to ensure consistency with London Plan Policy DF1. It would also be helpful to add active travel improvements to the list of relevant infrastructure as shown below:	Adding public transport to this paragraph as suggested would be duplication as it is specifically stated in the next sentence. The inclusion of 'active travel' in the next sentence is considered a positive suggestion. Proposed Modification:

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>‘Planning obligations will be sought on a scheme-by-scheme basis to secure the provision of affordable housing in relation to residential development schemes and necessary public transport improvements, and to ensure that all relevant development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal. Relevant infrastructure may include matters (but not limited to) such as public transport, active travel, health, counter-terrorism and public realm improvements.</p>	<p>Amendment paragraph A as follows: ‘Relevant infrastructure may include matters (but not limited to) such as public transport, <u>active travel</u>, health, counter-terrorism and public realm improvements’.</p>
TfL	<p>We welcome the addition of the following text to paragraph 2.11.4 although we recommend amendments as shown to ensure consistency with the London Plan and to provide greater clarity.</p> <p>‘Where considered a requirement a S.106 obligation may be secured for public transport for improvements to infrastructure such as transport bus services or bus infrastructure, stations access or capacity, junctions/roads or infrastructure to provide increased capacity or improved accessibility. or to contribute to new an improved public realm. Similarly, S.106 contributions towards walking and cycling infrastructure or the wider public realm may also be required from developments to meet the Mayor’s Healthy Streets Approach or to address deficiencies identified through an Active Travel Zone Assessment.’</p>	<p>It is unclear what benefit tailoring this paragraph specifically towards improved bus provision offers. The suggestion relating to public realm is accepted. Deletion of the first ‘public’ and ‘for’ would also assist in clarity.</p> <p>Proposed Modification:</p> <p>Amend part of paragraph 2.11.4 as follows: ‘Where considered a requirement a S.106 obligation may be secured for public transport for improvements to infrastructure such as public transport services, stations access or capacity, junctions/roads or infrastructure to provide increased capacity or improved accessibility. or to contribute to new an improved public realm</p> <p>...or to contribute to new an improved public realm.</p>
Knight Frank obo Met Police	<p>It is widely accepted and documented that policing infrastructure represents a legitimate item for inclusion within Section 106 agreements. A number of policing authorities have sought legal advice on this issue and received confirmation of this. We consider that the wording within the Emergency Services section within the IDP (as referenced by Draft Policy GR11) to be unsound, because of the following:</p> <ul style="list-style-type: none"> • MPS policing requirements are not set out as a legitimate S106 infrastructure requirement within the IDP or Draft Local Plan, which provides very little clarity to either the MPS or developers on what the S106 charging requirements are. While Draft Policy GR11 does state that “<i>where new development requires a bespoke mitigation to make a scheme acceptable</i>” the Council may enter into a S106 agreement”, we consider this to be insufficient. The MPS’s policing requirements are not subsequently listed as a potential requirement under supporting paragraph 2.11.4, within the IDP, or within the Planning Obligations & Affordable Housing SPD (2013). The MPS therefore strongly recommends that wording which provides further clarity to developers and the MPS that policing infrastructure is a legitimate S106 charging item; that would need to be met through Section 106 contributions be implemented preferably into the Local Plan, or in the IDP. • We are also supplying updated details regarding the ‘Current Provision’ section under the Emergency Services chapter in the IDP, to ensure that it remains up to date. <p>Should the Plan fail to provide further clarity on the S106 infrastructure requirements for policing, the MPS has concerns for the provision of funding to provide required infrastructure as the proposed lack of clarity is not considered to be sound. As such, we consider the Plan would be unsound on the basis of the above.</p>	<p>Policy GR11 refers to all infrastructure and does not limit them to those listed within the policy. Policy GR11 provides the mechanism for all relevant infrastructure.</p> <p>No proposed modifications</p>
Knight Frank obo Met Police	<p>MPS are seeking Section 106 charges to offset the cost of policing infrastructure, based on a charging methodology used widely by other police forces and already tested at appeal and in the courts. A calculator has been produced which assesses these charges, based on the</p>	<p>Policy GR11 refers to all infrastructure and does not limit them to those listed within the policy. Policy GR11 provides the mechanism for all relevant infrastructure.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>standard methodology. Section 106 contributions have been agreed in other London Boroughs based on this approach.</p> <p>There is also a significant requirement for neighbourhood bases in LB Harrow, which is increased by large schemes. As such, the Local Plan must make it clear that S106 contributions will be sought from developers on these schemes to help meet this need. The MPS is seeking the below wording should be included within the IDP, as set out under each subtitle. The proposed wording set out below has been adopted by other London boroughs already, for example in Waltham Forest.</p> <p><i>(the below wording to update the information within the Emergency Services table under 'Current Provision' under the 'Police' subtitle)</i></p> <p>At present there are two Police Stations within the borough, with an additional three Neighbourhood teams as follows:</p> <ul style="list-style-type: none"> • Harrow Police Station. • Pinner Police Station. <p>In addition to the above, the Police also have Neighbourhood bases in the community, which are currently located at:</p> <ul style="list-style-type: none"> • 1 Headstone Drive, Wealdstone; • Centenary Park Pavillion, Culver Grove; and • 155 Uxbridge Road, Hatch End. <p>Future Requirements Neighbourhood Offices</p> <p>The Metropolitan Police Service requirements in LB Harrow are shown in the below map, identifying wards where there is a requirement for a new police base. Whilst two Police Stations and three Neighbourhood Offices are currently functioning in the borough, there is a need for additional Neighbourhood Police Offices, particularly in locations where the nearest office is over twenty minutes away. Wards where Neighbourhood Office Space are likely to be required are mostly located toward the North East and West of the Borough as shown on the Map attached to Rep.</p>	<p>The IDP is intended to be updated regularly and the suggested text can be included in the next update.</p> <p>No proposed modifications</p>
Knight Frank obo Met Police	<p>Section 106 Financial Contributions</p> <p>There is a shortfall in funding for the required police offices and significant development places additional pressure on policing infrastructure in the borough. As such, where developments are of a sufficient scale, section 106 agreements will be used to secure appropriate improvements in neighbourhood police office provision. Some developments will be sufficiently large to give rise to the need for a new police office within the proposed development. In these cases, there will be an expectation for a new police neighbourhood office to be provided on site at peppercorn rent and the fit out costs covered.</p>	<p>Policy GR11 refers to all infrastructure and does not limit them to those listed within the policy. Policy GR11 provides the mechanism for all relevant infrastructure.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>The suitability of planning obligations is governed by the CIL Regulations. The matters outlined in criterion a will raise matters that are better dealt with by CIL than by planning obligations.</p> <p>Other proposals for s.106 contributions lie well outside of the mainstream. The LPA's continued concern with counter terrorism makes another appearance and it will be very hard to imagine a scheme where a planning obligation to address counter terrorist measures would be reasonable for reasons already referred to elsewhere.</p>	<p>Policy GR11 provides a mechanism for obligations 'outside the mainstream' to be sought and secured.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	
Home Builders Federation	<p>The policy is unsound because it is contrary to national and London Plan policy. Part A states that “Planning obligations will be sought on a scheme-by-scheme basis”. Strictly speaking, this should not be necessary. So long as the application complies with the policies in a local plan (these need to be clearly expressed, with no room for doubt), there should be no need for scheme specific negotiation. Indeed, the previous and the current Government are trying to move away from too much dependency of scheme specific negotiations owing to the very serious adverse effect this is having on housing delivery, not least in London. In London completions have fallen to an average of 37,200 homes per year, compared to the 52,300 a year needed, and planning approvals for residential development have collapsed from 89,000 in 2018/19 to 40,200 in 2022/23 (see the London Plan Review: Report of Expert Advisers, 15 January 2024).</p> <p>Moreover, the London Plan includes a ‘threshold’ approach to affordable housing, whereby if the applicant provides 35 per cent affordable housing and is policy compliant in other respects, then there is no need for a scheme related viability assessment. By contrast, Harrow Council appears to be rejecting that approach, and is seeking to extract the maximum development value from every application regardless of what national policy and the London Plan expects. This is the reason housing delivery is in such a parlous state in London. Smaller housebuilders have cited the length of time it takes with councils to secure planning permission as the top obstacle to increasing supply. The research by the HBF, published in December 2024, titled <i>State of Play: Challenges and Opportunities Facing SME Housebuilders</i> (HBF: December 2024) found that delays in securing planning permission and discharging conditions was the top barrier facing SME housebuilders. This concern was shared by 94% of respondents nationally, but higher still in the south of England including London (95%)</p> <p>Part A is unsound and should be redrafted to reflect the principles of the London Plan.</p>	<p>The Community Infrastructure Levy Regulations 2010 (as amended), specifically the ‘three tests’ in Regulation 122, makes it clear that the acceptability of a planning obligation is related to the nature of the development and therefore there will need to be negotiated on a scheme-by-scheme basis having regard to the impacts of the development and what is required to make it acceptable.</p> <p>The Local Plan supports and is consistent with London Plan (2021) in terms of the fast-track approach for affordable housing. However, where this is not met, a site specific / viability tested route must be followed. Policy GR11 is in conformity with the London Plan (2021) on this matter.</p> <p>No proposed modifications</p>

Policy GR12 – Site Allocations

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Standard Response 1	<p>The allocation for sites on Station Road has been significantly inflated: the Tesco site allocation rose from 14 to 500, and the Civic Centre from 300 to 1139 compared to allocations in the 2013 Local Plan. These changes appear to be more driven by developer pressure than by actual capacity calculations, suggesting a target-driven 'anything goes to help the developer' approach, particularly in the Opportunity Area. The Tesco Station Road site, (designated as site-OA7), lies within a protected view area, is not located in the Town Centre, has a Public Transport Accessibility Level (PTAL) of 3-5, and is adjacent to a low-rise area outside the Opportunity Area. It directly backs onto a residential area not within the Opportunity Area, raising serious questions about its suitability for high-density development of up to 500 flats.</p> <p>It is proposed to reassess whether such a high-density allocation for the Tesco and Civic Centre sites aligns with the best interests of the residents as well as the Council’s own assessments. Most of the Opportunity Area has been redesignated to permit developments like Shared Living, which do not address the shortage of social rented and family-sized housing. Indeed, the majority of the units are planned as one or two bedroom flats more</p>	<p>The current Local Plan site allocations were adopted in 2013 and reflected the London Plan housing targets, site specific circumstances (i.e. availability / extant permissions) and evidence base at the time. The housing target for the borough has increased in subsequent versions of the London Plan and sites / capacity need to be identified to reflect these increased targets; it would not be appropriate to rely on capacity figures over a decade old.</p> <p>The Council considers the Opportunity Area to be the most sustainable location in the borough to accommodate new development. There is significant need for new housing, and it is appropriate that the most sustainable areas within the borough are fully explored for capacity. It is a sustainable decision to locate growth in an area with substantial public transport infrastructure, employment, and services / community infrastructure.</p> <p>Each of the proposed site allocations have followed guidance set out in the <i>Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023)</i>.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Leslie Coombes	<p>suitable for investors to rent out for exorbitant returns to single people or couples instead of the desperately needed family units.</p> <p>The 2013 plan designated the Station Road sub-area to maintain its low-rise profile, acting as a buffer between the densely populated Harrow and Wealdstone Town Centres, with an aim to improve public spaces and connectivity while preserving its unique character. It was considered unsuitable for high-density development due to the risk of congestion and blending into a single town centre. In contrast, the current plan permits 18-storey buildings in this congested and polluted area, which is recognised as an air quality management area and was found inappropriate for dense housing in the council's tall buildings study. The 2024 Plan's approval of high-density development in Station Road, despite its claim to harmonize with the lower-density suburbs, seems unfeasible. This may unintentionally result in the amalgamation of Harrow and Wealdstone into a singular town centre, a move not explicitly stated by the council.</p>	<p>No proposed modifications</p> <p>The current Local Plan site allocations were adopted in 2013 and reflected the London Plan housing targets, site specific circumstances (i.e. availability / extant permissions) and evidence base at the time. The housing target for the borough has increased in subsequent versions of the London Plan and sites / capacity need to be identified to reflect these increased targets; it would not be appropriate to rely on capacity figures over a decade old.</p> <p>The Council considers the Opportunity Area to be the most sustainable location in the borough to accommodate new development. There is significant need for new housing, and it is appropriate that the most sustainable areas within the borough are fully explored for capacity. It is a sustainable decision to locate growth in an area with substantial public transport infrastructure, employment, and services / community infrastructure.</p> <p>Each of the proposed site allocations have followed guidance set out in the Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023).</p> <p>No proposed modifications</p>
Sunil Kapoor	<p>The housing allocation for sites on Station Road has been significantly increased: the Tesco site allocation rose from 14 to 500, and the Civic Centre from 300 to 1139 compared to allocations in the 2013 Local Plan. These changes appear to be more driven by developer needs than by actual capacity calculations, suggesting a target-driven 'anything goes' approach, particularly in the Opportunity Area. The Tesco Station Road site, (designated as site-OA7), lies within a protected view area, is not located in the Town Centre, has a Public Transport Accessibility Level (PTAL) of 3-5, and is adjacent to a low-rise area outside the Opportunity Area. It directly backs onto a residential area not within the Opportunity Area, raising questions about its suitability for high-density development of up to 500 flats. It is proposed to reassess whether such a high-density allocation for the Tesco and Civic Centre sites aligns with the best interests of the residents.</p>	<p>No proposed modifications</p> <p>The current Local Plan site allocations were adopted in 2013 and reflected the London Plan housing targets, site specific circumstances (i.e. availability / extant permissions) and evidence base at the time. The housing target for the borough has increased in subsequent versions of the London Plan and sites / capacity need to be identified to reflect these increased targets; it would not be appropriate to rely on capacity figures over a decade old.</p> <p>The Council considers the Opportunity Area to be the most sustainable location in the borough to accommodate new development. There is significant need for new housing, and it is appropriate that the most sustainable areas within the borough are fully explored for capacity. It is a sustainable decision to locate growth in an area with substantial public transport infrastructure, employment, and services / community infrastructure.</p> <p>Each of the proposed site allocations have followed guidance set out in the Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023).</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>The site allocations comprise the second half of the draft local plan and therefore do not require a policy in the first half of the plan. This policy deals with compulsory purchase, and it should be re-named to reflect that.</p> <p>BB this policy is unnecessary and should be deleted. If the site has received an allocation and it has been assembled by compulsory purchase then that is the end of the matter. Adding in the idea of comprehensive development confuses this position and suggests that the allocated site should only come forward as part of a wider site comprising other non-</p>	<p>Policy GR12 provides a policy basis for the Site Allocations within the Local Plan, and its location in the Good Growth chapter is appropriate. Policy GR12 seeks to ensure that the Council will support the delivery of allocated sites and assist in unblocking barriers that constraint their delivery or the optimal use of the site or adjoining sites. The reference to the use of Compulsory Purchase Orders is one such method to overcome barriers to delivery.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>allocated sites which may be outside the applicant's control. This will just create confusion and delay and prevent even allocated sites from potentially coming forward.</p> <p>Policy BC should also be deleted. By definition an allocated site has been allocated explicitly to achieve the delivery of homes and other identified needs and therefore it is not necessary for this to be further justified by this policy.</p> <p>This would only make sense if policy GR 12 B addressed non-site allocation sites that ought to be compulsorily purchased but this is not clear. Because the entire policy is called Site Allocations it suggests that GR 12 B only relates to allocated sites. It may be that the LPA intended a division whereby GR 12 A deals with allocated sites and GR 12 B deals with non-allocated sites however, as drafted this is entirely unclear and therefore the policy should be deleted.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Comprehensive development is encouraged (rather than piecemeal) as this will often lead to the optimal use of sites where an allocation is made up of a number of sites.</p> <p>No proposed modifications</p>
<p>Greg Dowden / Broadgate Development Partners Ltd</p>	<p>Policy GR 12 C it is not clear who the applicants will be in this scenario. The LPA are the acquiring authority and they are the ones that trigger compulsory purchase proceedings. They will have due regard to the impacts on cost and liability as part of their decision whether to compulsorily purchase a site or not. It is not necessary for this matter to be dealt with by a specific planning policy.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>The LPA will work with the applicant of a planning application, in particular on an allocated site, where there are barriers to development. The LPA will assist in its remit to facilitate the use of Compulsory Purchase Order to assemble land. If a CPO is proposed, it is reasonable for an applicant to be able to demonstrate that the impact of any costs of this on development viability.</p> <p>No proposed modifications</p>
<p>Greg Dowden / Broadgate Development Partners Ltd</p>	<p>Policy GR 12 D should also be deleted. If a site has been identified and it has been agreed to be compulsorily purchased, as drafted this policy expects landowners and applicants to demonstrate that they have assembled the largest site that they can, even though this may be larger than the site which in which they are interested or which is viable. It continually requires site owners to seek to require the adjoining site and it is not clear when the position of site optimisation will be reached, and who will be the judge of that. This policy is particularly ownerless and vague.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Site allocations are mapped and therefore the extent of site assembly is clear. Outside of this, applicants are expected to explore opportunities for site assembly and demonstrate any such discussions regardless if they were positive or not.</p> <p>No proposed modifications</p>
<p>Greg Dowden / Broadgate Development Partners Ltd</p>	<p>Policy CE is also unreasonable. It may be that there are no proposals on a site allocation or proposals to compulsorily require a site. It will therefore not be known by an adjoining site owner whether their scheme will or will not prejudice the future delivery of a site. Adjoining sites should not be prevented from coming forward if they are in a position to do so and meeting identified need on a shorter timeframe if slower moving larger sites cannot be promoted fast enough. Such sites should not receive additional protection at the expense of smaller sites which can be brought to the market quicker.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted.</p>	<p>Windfall sites adjacent to an allocated site (if not able to be assembled) should demonstrate that development would still be able to be delivered on the allocated site, and not frustrated through a windfall development. It is an exercise to ensure the capacity of allocated sites can still be delivered over the plan period.</p> <p>No proposed modifications</p>
<p>Environment Agency</p>	<p>We believe using the term "<i>Flood zone (Surface Water) 3a</i>" is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is</p>	<p>Proposed Modification</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Amend references to flood zone (surface water) 3a to high/ medium/ low risk of surface water flooding as appropriate in the site allocations, as set out in the SFRA. See individual Site Allocations.

Strategic Policy 2 - Harrow's Historic Environment

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Historic England	We welcome the amendments to this policy, but in terms of conformity with the NPPF and London Plan we would query if the policy could mention ensuring that the historic environment is central to place-making, potentially including the promotion of heritage-led regeneration, particularly where this brings long term value and sense of place to development. Similarly, a point regarding the use of Article 4 Directions and taking enforcement action where necessary would be beneficial. We mention the latter as there is some good supporting text on the matter, but no clear hook in terms of policy criteria. (See HE18)	Neither of the matters raised are considered to represent issues with the soundness of the plan. The Council does not wish to specify the prioritisation of a specific spatial objective in this policy, with the plan being read. Matters relating to enforcement and Article 4 Directions are not specific nor unique to heritage matters and specific referencing here would not be appropriate. No proposed modifications
Historic England	We suggest clarifying Strategic Policy 02.A.e as per HE12. For example, ' <i>Ensuring that new development within the locally strategic protected views (as set out within the policies map) does not harm views the significance of heritage assets within those views, for example, St Mary's Church spire and on Harrow on the Hill Conservation Area.</i> '	This proposed amendment is considered positive with respect to clarity. Proposed amendment: Amend SP02, Part Ae as follows: Ensuring that new development within the locally <u>strategic</u> protected views (as set out within the policies map) <u>does not harm views the significance of heritage assets within those views, for example to St Mary's Church spire and on Harrow on the Hill Conservation Area and other identified assets.</u>
Historic England	We welcome the ambition of Strategic Policy 02.C but suggest that it might be more clearly stated. For example, ' <i>Support the integrated management of the natural and historic environment where they conserve and enhance the significance of both and optimise co-benefits, especially for climate change.</i> '	This proposed amendment is considered positive with respect to clarity. Proposed amendment: Amend SP02, Part C as follows: Support the integrated management measures to heritage assets to mitigate and adapt to climate change, of the natural and historic environment where this conserves and enhances and nature where appropriate, where these are able to be undertaken sensitively, whilst not harming the significance of both and optimise co-benefits, especially for climate change. the heritage asset
Historic England	Whilst we do not seek to encourage duplication, Strategic Policy 02.B and 02.D paraphrase points made in the NPPF and to avoid any issues with conformity it may be best to repeat them verbatim.	Noted. The Council is not seeking to duplicate the NPPF. No proposed modifications
Historic England	We welcome that there is some strong supporting text, but we suggest that its structure is revisited to ensure that all points mentioned have a hook in the preceding policy and follow the order of points covered. (See HE14)	This is not required for soundness and supporting text is only required where necessary rather than needing to cover every aspect of the policy.

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		No proposed modifications
Historic England	We welcome that Harrow is updating its APAs in line with the London Plan. This merits inclusion in the supporting text, perhaps at para. 3.04. where it states that the council will continue to work with partners to keep up to date evidence on heritage assets. The same point could be made and expanded upon at para. 3.1.17. Here it would be worth explaining what the new tiers will mean for applicants (i.e. that tier 1 sites are equivalent to nationally important remains and subject to the same policies).	This is considered repetitious of the London Plan and not essential to the soundness of the plan. It also risks dating quickly. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	In policy 02A only subsection A should be retained. None of the other criteria in B to F are land use planning activities and do not warrant local plan policies being made in respect of them. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	The Council considers that the paragraphs address different matters. As a strategic policy, it sets the overarching, holistic policy for heritage assets in the borough. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Policy B should be deleted as its meaning is unclear. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	The Council considers that the paragraph is beneficial in confirming the status of heritage assets even if they are in a poor condition. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Policy C should be deleted as it does not add anything which is not already covered in policy AA. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	The Council considers that the paragraphs address different matters to the rest of the policy and therefore adds to it and should therefore be retained. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Policy D should be deleted because its meaning is unclear because of poor drafting. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	The Council considers that the wording is appropriate. No proposed modifications

Policy HE1 – Historic Environment

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Places for London	We support the deletion of paragraphs Ba.to g. and, instead, reliance on assessment through a Heritage Impact Assessment which would need to follow the tests and balancing set out in the NPPF. This addresses our Regulation 18 representation on the left.	Noted. No proposed modifications
Places for London	We welcome the removal of references to locally listed buildings in paragraph E and support them being dealt with separately from statutory listed buildings (and other designated heritage assets) within new paragraph J . This addresses our Regulation 18 representation on the left.	Noted. Refer however to representations from Historic England. No proposed modifications
Places for London	The additional text for paragraph I (<i>Registered Parks and Gardens</i>) should refer to a balanced judgment (in accordance with the NPPF) being taken in cases where development impacts on significance or setting. In addition, the reference to locally listed parks and gardens should be removed because non-designated heritage assets are now dealt with in paragraph J .	It is considered that the provisions of Part I of the policy should apply to both locally and registered listed parks and gardens (refer to representations from Historic England). No proposed modifications

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Places for London	<p>In addition to (A) and (B) above, when considering proposals affecting the significance of registered and/or locally listed parks and gardens, the Council will:</p> <p>a. Ensure that development does not detract from the significance of the park, garden or landscape (including any contribution made by setting); or prejudice its continued operation or future restoration. In weighing applications that affect the significance or setting of the asset, a balanced judgement will be taken including the public benefits of a scheme;</p>	<p>It is considered that the provisions of Part I of the policy should apply to both locally and registered listed parks and gardens (refer to representations from Historic England).</p> <p>The second suggested modification is considered unnecessary as it duplicates the NPPF.</p> <p>No proposed modifications.</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>HE1A does not reflect the national policy regime for the historic environment set out in the NPPF and NPPG. The concept of sustainable enjoyment of the historic environment does not exist in the NPPF and this policy suggests that there may be circumstances where harm to the historic environment could be done by a scheme yet providing it also resulted in sustainable enjoyment of the historic environment occurring it would be acceptable. This conflicts with national policy.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>The Council contends that the sustainable enjoyment of heritage assets, while not specifically quoted from the NPPF/G, is a sustainable approach and a consideration in any planning balance judgement.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Policy B should also be deleted as it does not affect national policy. Any assessment should be proportionate and this important qualification is missing from this policy.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>This part of the Policy is in line with the NPPF/G.</p> <p>No proposed modifications.</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Policy E should be deleted because the phrase maximise all opportunities to secure the future of this buildings is an aspiration not a planning policy. The statement lacks rigour and will not provide a basis for efficiently or consistently determining planning applications.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Maximising opportunities to retain listed buildings is an appropriate outcome for a planning policy.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Policy H should be also deleted. The council must have due regard to all up-to-date guidance published by historic bodies in respect of all forms of heritage asset not just archaeological.</p> <p>This position does not warrant a planning policy to state what the council must do in any event. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>This part of the Policy is in line with the NPPF/G</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Policy I simply repeats policies that have already been set out above or elsewhere in the local plan. It adds nothing new and through repetition only serves to add complexity and confusion to a plan that is already over long and too complex.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>This part of the Policy is in line with the NPPF/G.</p> <p>No proposed modifications.</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Policy J should also be deleted. It does not reflect government policy about non-designated house assets and excludes the public benefit test that is a key feature of the NPPF. This policy has drafted this misleading and does not reflect national policy closely enough and so should be deleted.</p>	<p>This part of the Policy is in line with the NPPF/G. Refer however to representations from Historic England.</p> <p>No proposed modifications.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	
Historic England	Apologies as edits suggested at Regulation 18 have not worked well. It is recommended that the designated and non-designated subtitles are deleted and that each policy subtitle is amended to cover the designated type of asset and its non-designated equivalent. For example, 'Conservation Areas' becomes 'Conservation Areas and Areas of Special Local Character' and 'Scheduled Monuments' becomes 'Scheduled Monuments and Non-designated Archaeological Assets'. The policies for each category of designated and non-designated will have the same considerations, it will just be the weight given to the conservation of the asset that differs according to its importance. The supporting text should be similarly structured.	<p>The representation and proposed modifications are considered to have merit and in many instances revert back to the Regulation 18 version's approach.</p> <p>Proposed modifications: Insert new Part C to read as follows: <u>C. Proposals relating to heritage assets (either designated or non-designated) will be considered against the relevant provisions of the NPPF</u></p> <p>Proposed modification: Delete subheading: Designated Heritage Assets</p> <p>Proposed modification: Update subheadings for each separate heritage asset to combine designated assets and their undesignated equivalents:</p> <p><u>Conservation Areas and Local Areas of Special Character</u></p> <p><u>Listed Buildings and Locally Listed Buildings</u></p> <p><u>Scheduled Monuments and Non-Designated Archaeological Assets</u></p> <p><u>Registered Parks and Gardens (including locally listed parks and gardens); and Locally Listed Parks and Gardens</u></p> <p>Proposed modification: Amend all subheadings from D through to J (inclusive) to read; <u>In addition to (A), and (B) and (C) above...</u></p> <p>Proposed modification: Delete sub-heading Non-Designated Heritage Assets and paragraph J.</p> <p>Non-Designated Heritage assets</p> <p>J. The Council will consider the effects on the significance of a non-designated heritage asset. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be taken.</p> <p>Policy HE1: Historic Environment - Supporting Text</p> <p>Proposed modification - Subheadings After paragraph 3.1.8 Delete subheading Designated Heritage Assets</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>Amend the following subheadings Development within Conservation Areas and Local Areas of Special Character Listed Buildings and Locally Listed Buildings Non-Designated Heritage Assets Registered Parks and Gardens (Locally Listed Park and Gardens) and Locally Listed Parks and Gardens</p> <p>Proposed modification Delete paragraph 3.1.13 Non-designated heritage assets are locally important assets which can range across a number of assets that include locally listed buildings, locally listed parks and gardens, archaeological priority areas and Local Areas of Special Character (LASC). By reason of the difference in listing, there is a differing level of protection afforded to these assets.</p> <p>Proposed modification Relocate paragraph 3.1.14 to paragraph 3.1.11</p> <p>Proposed modification Remove erroneous reference to a paragraph at end of paragraph 3.1.13 ...particularly in respect of buildings on the heritage at risk register (see paragraph 3.25 below):</p> <p>Proposed modification Renumber paragraphs from 3.1.11 to 3.1.22 (end of supporting text).</p>
Historic England	<p>Conflation of townscape and heritage issues often results in development that is better than that which preceded it, being deemed beneficial to the historic environment, when in fact it is not, or it is harmful. To help counteract this, we advise strengthening the policy or supporting text for conservation areas and areas of special landscape character by setting out how beneficial effects should be measured. For example: <i>'To be considered beneficial, a proposal within a conservation area must:</i></p> <p><i>1. Respond to Character: The design of the new building must be informed by a thorough understanding of the existing character and appearance of the conservation area.</i></p> <p><i>2. Better Reveal Significance: The proposal should better reveal or reinforce the area's architectural or historic interest through a contextual and considered design response.</i></p> <p><i>3. Design Quality Benchmark: The quality of the design will be assessed based on how well it responds to the existing historic and architectural character and appearance of the conservation area, rather than the poor quality of the building or space being replaced.</i></p>	<p>This level of detail is considered excessive for a Local Plan policy and / or supporting text and would be best located in supplementary planning guidance, either as part of character assessment and management strategies for individual / groupings of conservation areas, or design codes. It is not considered to represent a matter of soundness.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p><i>Replacing a negative feature with a building of a more contemporary design and in better condition, but still not in keeping with the character and appearance of the conservation area, should not be considered a heritage benefit.</i></p> <p><i>To ensure that redevelopment within conservation areas contributes positively to the area's character and significance, detailed design information is essential. Proposals should include comprehensive details on:</i></p> <ul style="list-style-type: none"> <i>• Scale and Massing: The size, bulk and form of the new development should be in harmony with the existing buildings in the conservation area.</i> <i>• Roof Form and Detailing: The design of roofs, including their shape, pitch, and materials, should be informed by the traditional forms found in the area.</i> <i>• Elevational Detailing and Features: The facades of new buildings should respond to architectural details and features that are characteristic of the conservation area.</i> <i>• Materials: High-quality materials should be used that are in-keeping with historic material use in the area.</i> <i>• Access and Boundary Treatments: The design of access points and boundary treatments should respect the historic layout and patterns of the conservation area.</i> <p><i>Outline applications, which often lack these details, may not provide sufficient information to assess the impact of a proposal. Therefore, detailed applications are encouraged to ensure that the finer design details are considered from the outset, allowing for a thorough assessment of the proposal's impact on the conservation area.</i></p> <p><i>When a proposal departs from the existing character, clear and convincing justification will be needed. It is expected that such designs are outstanding or innovative in a way that will add to the character and architectural legacy of the area.'</i></p>	
Historic England	<p>For consistency, we advise that a heritage at risk criteria is added to the conservation area policy. For example: <i>'c. Maximise all opportunities to secure the future of conservation areas particularly those on the 'heritage at risk' register.'</i></p>	<p>The representation and proposed modification are considered to have merit.</p> <p>Proposed modification:</p> <p>Add a new part (part c) to Part D as follows: 'Maximise all opportunities to secure the future of conservation areas particularly those on the 'heritage at risk' register'.</p>
Historic England	<p>HE.E Listed Buildings and Supporting Text</p> <p>As above, we suggest that the policy and supporting text sections are retitled 'Listed and Locally Listed Buildings'. Then either section could be strengthened to require that proposals ensure new development is in keeping with the significance of the building and harmonious with its surroundings and the wider character of the area. For example, they should:</p> <ol style="list-style-type: none"> 1. Be of a high-quality design and sympathetic in terms of scale and form to the original structure and in the use of materials and other details to the period and style of the original structure. 	<p>This level of detail is considered excessive for a Local Plan policy and / or supporting text and would be best located in supplementary planning guidance. It is not considered to represent a matter of soundness.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>2. Factor sustainability and salvage aspects into proposals and maximise opportunities to mitigate or adapt to climate change through the retention, retrofit, re-use or adaptation, provided that this is not to the detriment of important aspects of significance.</p> <p>3. Maintain the significance of interiors and retain internal features of interest including layouts, methods and means of construction where these are important.</p> <p>4. Demonstrate that the benefits of any proposed change of use would be in keeping with the significance of the structure and wider area.</p>	
Historic England	<p>HE1.H Archaeological Assets</p> <p>We advise expanding this policy to include the following criteria:</p> <ul style="list-style-type: none"> - A presumption in favour of the preservation of regionally and locally important sites, except where the applicant can demonstrate that the benefits of development will outweigh the harm to archaeological remains. - A requirement that any remains of archaeological value are properly understood and, if necessary, evaluated prior to the determination of the planning application. <p>Prior to development, a programme of archaeological investigation, recording and public dissemination/engagement will be required for any archaeological remains lost.</p>	<p>This level of detail is considered excessive for a Local Plan policy and / or supporting text and would be best located in supplementary planning guidance. It is not considered to represent a matter of soundness.</p> <p>No proposed modifications</p>
Historic England	<p>For clarity, it would be useful if the supporting text included a definition (as per the NPPF) of what heritage assets are.</p>	<p>Heritage asset is already defined in the Glossary.</p> <p>No proposed modifications</p>
Historic England	<p>Again, there is some great supporting text for this Policy HE1: Historic Environment. However, it might be useful to look at the structure and ensure that it all has a relevant policy hook (the climate change and public access text may be better placed in the strategic section?). Adding a short section at the end with a sentence or two on Heritage at Risk would also support the policy criteria that refer to this.</p>	<p>This is not required for soundness and supporting text is only required where necessary rather than needing to cover every aspect of the policy.</p> <p>No proposed modifications</p>

Policy HE2 – Enabling Development

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	<p>Enabling Development is a creative and flexible tool recognised by national policy in the NPPF to ensure the long-term preservation of the historic environment. It should be embraced as an opportunity to encourage the conservation and preservation of assets that would otherwise fall into disrepair or continue in that state. As drafted the policy is negative and resists enabling development coming forward and this policy should be deleted. It should be drafted to be an open proactive policy that sets out the circumstances where enabling development will be encouraged, not setting out all the circumstances where it will be resisted.</p>	<p>Policy HE2 sets enabling development rightly as the last resort to preserve a heritage asset, and refers to relevant Historic England guidance.</p> <p>No proposed modifications</p>
Historic England	<p>Enabling development is development that is not otherwise in accordance with adopted policy. Historic England are therefore of the view that a policy on enabling development is not a necessary component of a local plan document. As per our Reg.18 response, we maintain that a local plan should adequately set out a positive strategy for the historic environment without the need to include such a policy. However, we welcome that Harrow LPA have proactively addressed our concerns with the wording of the draft Regulation 18 policy and, we do consider the wording to now be appropriate.</p>	<p>Noted.</p> <p>No proposed modifications</p>

Strategic Policy 3 – Meeting Harrow’s Housing Needs

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Standard Response 1	<p>Despite the limited construction of family-sized social homes (for rental) in the borough, there is no indication that the Council can supply the necessary number of such homes. A significant portion of the new housing will consist of one or two bedroom flats. The Council has conflated the provision of social rent homes with so-called 'affordable' rent homes. These two are not necessarily the same and could obscure the actual provision of social rent homes, which are more affordable than intermediate housing.</p> <p>Proposed Change: Residents would likely be more receptive to development if it genuinely addressed the housing crisis, which currently it does not, and will not, in the proposed new Plan. The majority of residents oppose the construction of additional 'luxury flats' which will inevitably be acquired by outside investors for profit. This has been made abundantly clear to the Council on several occasions by local residents. The Council seems to have totally ignored the wishes of the residents who would be directly affected, despite stating they take into consideration views of residents.</p>	<p>The Plan sets out policies that will deliver the number, range of sizes, and types of tenure of new homes that are needed locally. This includes reflecting the targets for each that are required by the London Plan, and local housing needs as identified by the evidence base informing the Local Plan, including for affordable homes, and homes of a range of different sizes. Policies within the plan with respect to the provision of family-size housing strengthen the position from the current Local Plan, reflecting the evidence base. Affordable housing for rent will be social rent, the most affordable tenure. The plan has also had regard to viability evidence to inform policies that will support deliverable developments across the Plan period. The Mayor has advised that he is of the opinion that the draft Plan is in general conformity with the plan.</p> <p>No proposed modifications</p>
Planning Issues	<p>We support this draft policy which supports the delivery of at least 980 units of specialist older person accommodation, comprising retirement housing units extra care housing units between 2022- 32. However, we would observe that this is a significant number of older persons housing and that the delivery of older persons housing over the preceding 10-year period has been nowhere near this level with only a handful of developments coming forward over that period.</p> <p>The 2022 Housing LIN needs survey suggests that at 2022, the existing supply of housing for older people and housing with care was just 1,845 units, some of which was delivered as part of local authority programmes over 50 years ago. This suggests that despite the clear and acknowledged demand for such housing, providers are finding it difficult to secure and bring forward such developments in the area. This may be due to the local land market but clearly, policy restrictions also play a part. The delivery of 980 additional units within this typology will require a step change in delivery and a flexible policy approach by the council. We consider that without a flexible approach, the delivery of this critical housing typology will remain constrained.</p> <p>We recommend that criteria C of this policy is amended to state include the following additional text:</p> <p>The council recognises past levels of undersupply in this typology and the critical need for such housing in Harrow. As such, the application of infrastructure, affordable housing and other policies required elsewhere in the plan will be applied flexibility to housing for older person proposals recognising the viability constraints for this typology as established within the council’s viability evidence base.</p>	<p>Policy HO6 sets out a positive strategy to ensure a sufficient supply of older person accommodation, of the right type, tenure and location is delivered to address local needs, during the plan period. The Local Plan site allocations are expected to provide 81 additional specialised older person accommodation, some permissions have been implemented (since 2021) and further sites will come forward to address older person housing needs. The supporting text of Policy HO6 notes Council owned older person accommodation sites, built in the 1960-80’s are expected to come forward for development, to provide new/enhanced older person accommodation to meet the future needs.</p> <p>This policy is supported by a Local Plan Viability Study. This utilised a typology approach (including older person accommodation) to assess the potential cost impacts of policy requirements and obligations (e.g. affordable housing, infrastructure provision) on the viability of development. It is considered the NPPF (para 58), London Plan (H5: threshold approach) and Local policies (i.e. HO4, provide sufficient flexibility to consider site specific factors that may impact the viability of schemes at application stage. For example, the NPPF provides scope for applicants “to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage (para 58)“.</p> <p>No evidence has been provided to support the representation’s assertion that policy constraints are limiting delivery of older persons accommodation.</p> <p>No proposed modifications</p>
Zahir Abdulla	<p>The council's conflation of social rent and 'affordable' rent housing masks the true extent of the affordable housing shortage. While the need for family-sized social rent homes remains unmet, the proposed development includes a significant number of flats, many of which may be considered 'luxury'. To gain public support, the council should focus on delivering genuinely affordable housing solutions that directly address the housing crisis.</p>	<p>There is no conflation as stated. The Local Plan provides a policy in relation to housing need (HO1) which is based on local evidence base. Policy HO4 sets out how affordable housing will be secured, and is in conformity with the London Plan (2021). It seeks social rented housing as the priority tenure within any affordable housing provision secured through development.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Peter Taylor	The plan says a “minimum of 16,040 (net) homes” will be delivered, but there is no mention of the maximum that is planned for or will be allowed. What is considered the upper limit for the borough?	<p>No proposed modifications</p> <p>The meeting of housing targets must necessarily be expressed as minimums in order to be in general conformity with the London Plan. The targets, as set out in the London Plan, are informed by land availability, and as such they are evidence-based, in so much as there is not known capacity to go substantially beyond the target within the Plan period but windfall sites may come forward and proposals for these would be assessed with respect to their impact, including on infrastructure.</p> <p>No proposed modifications</p>
Peter Taylor	No consideration given to the impact of recently built flats. Concerned multiple issues in relation to these such as they are too expensive for local Harrow residents and sold to international investors. This does not address affordability and issue raised in the Plan	<p>Noted, although no evidence has been submitted to support this assertion. The Plan sets out policies that will deliver the number, range of sizes, and types of tenure of new homes that are needed locally. This includes meeting the targets for each that are required by the London Plan, and local housing needs, including for affordable homes, and homes of different sizes. The evidence base confirms there is a need for private sector housing, having regard to the ability of households to be able to purchase this (see Local Housing Needs Assessment, Chapter 3).</p> <p>No proposed modifications</p>
Peter Taylor	<p>SP3 states indicates a minimum of 4,125 new homes on small sites (below 0.25ha) will be supported on allocated sites within the Plan and windfalls sites, in locations with good public transport accessibility (PTAL 3-6) and 800m of transport hub or a Metropolitan, Major, District town centre boundary.</p> <p>Concerned there is a lack of space for 4,125 new homes on small sites?. It is unclear how figure was derived and how many homes per site/area will be delivered</p>	<p>Policy H2 of the London Plan sets a target to deliver 375 homes per annum on small sites (below 0.25ha), to diversify sources of supply to address local needs (as required by the NPPF). Proposals can include “new build, infill development, residential conversions, redevelopment or extension of existing buildings, etc; to intensify existing residential areas and provide additional housing. They usually come forward via the planning application process and are difficult to identify via the Local Plan making process, unless the sites are submitted.</p> <p>The target is based on past trend in housing delivery. The London Plan (2021) indicates the small site target (375 dpa) can be considered as a reliable source of windfall housing sites and can contribute towards future supply to meet the Local Plan housing requirement (para 72, NPPF). The Small Sites Capacity Study (2022) indicates circa 300 homes per annum (p.a) were delivered on small sites between 2010-19 and there is a capacity to deliver between 380 - 478 homes per year over the Plan period.</p> <p>No proposed modifications</p>
Peter Taylor	<p>The Plan seeks to ensure 50% of all housing delivered are delivered, with a 70: 30 tenure split between low cost rented and intermediate housing.</p> <p>The plan only seeks to ensure that 50% of new dwellings will be genuinely affordable, and it will not be legally mandatory. How will the Council seek to ensure that the 50% target will be hit? This point is unenforceable and misleading.</p>	<p>It is not agreed that the requirements are unenforceable and misleading. The purpose of the Local Plan is to provide a local policy basis for the determination of planning applications, based on local evidence and within general conformity with the London Plan. The up-to-date Local Plan, alongside the London Plan provides a policy basis for determining applications that will meet local housing needs in terms of affordability. The overarching affordable housing requirement and tenure split within that is in general conformity with the London Plan. The</p>

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		<p>process for determining applications and securing affordable housing reflects the NPPF and London Plan.</p> <p>No proposed modifications</p>
Peter Taylor	The whole sections seems only to deal with the number of homes to be built as demanded by the plan, Harrow Councils Housing Needs – not Harrow’s Residents Housing Needs.	<p>Harrow’s housing target is set out in the London Plan. In the preparation of the Harrow Local Plan the council have had regard to local resident’s housing needs as set out in the Harrow Local Housing Needs Assessment.</p> <p>No proposed modifications</p>
Peter Taylor	Build to rent (point G) mentions “high quality design” – how is this measured, and by whom. All housing is designed. What differentiates high quality from quality design or homes that are just designed? – Could the plan not required “the highest quality design”?	<p>‘High quality design’ is a widely accepted requirement, for example, London Plan Policies D4: Delivering Good Design (Part A) and D6: Housing quality and standards. It is measured through the application of relevant policies within the London Plan and Local Plan to a development proposal. ‘Highest quality’ is subjective and excessive; ‘high quality design’ is a sound aspiration that reflects the London Plan.</p> <p>No proposed modifications</p>
Peter Taylor	Parts of the New 2021-2041 Local Plan seems to be responding to the forecast patterns of growth and development it is committing to in other parts of the plan. The Infrastructure Delivery Plan (October 2024) under population growth (page 7 & 8) is forecasting falling populations in 5 years and 15 years in numerous wards across the Borough, and the New 2021-2041 Local Plan does not address this. It is not clear what the population trajectory would be if the development plans being allowed in this plan were not approved. What would be the population trajectory be if the previous plan was extended until 2041 and what is the do nothing (don't apply the New Local Plan 2021-2041) population growth?. The falling populations out lined in the New Plan given all the information to date and forecasts across London would appear to be wrong. This would lead to the planning being based on the population trajectory for these areas and the Borough being wrong.	<p>Harrow’s housing target is set out in the London Plan. Maintaining housing targets from previous plans is not a sound approach, as it does not take unto account previous under-provision of housing and matters such as overcrowding and concealed households (i.e. households that would form if they could i.e. adult children living with their parents).</p> <p>No proposed modifications</p>
Hilary & Leslie Coombes	Higher levels of family social housing need to be delivered to address existing shortfalls in stock, compared to flatted development that tend to be unaffordable	<p>Policy SP3 set the overarching targets to address local needs. Policy HO1 includes a criterion to assess locally specific factors and requires developments to ensure a minimum of 25% (or more) of all new homes (including flatted developments) are family sized. The Plan also includes policies to protect the existing family housing stock (HO2, HO10) and increase the provision of affordable housing (HO4).</p> <p>No proposed modifications</p>
<p>Bell Cornwall obo Old Millhillians part of harrow garden centre site</p> <p>Home Builders Federation</p> <p>Greg Dowden / Broadgate</p>	<p>The strategic target to deliver 98 specialised older people units (or 980 units between 2021-31) has been set too low, as this assumes the older population may fall after 2029. This should be increased to 165 units per annum (or 3000 units between 2017-29) in line with the London Plan benchmark target.</p> <p>Concerned the proposed allocations will deliver total of 81 (.i.e. 56 & 25 units on Sites 14, 18) specialised older person units and result in an under supply against the target (980)</p> <p>Bell Cornwall suggest additional sustainable sites (.i.e. Old Millhillians Club Land) should be allocated in the Plan to deliver specialist older people accommodation within 5 years</p>	<p>In line with the NPPF (para 63) and London Plan (2021) Policy H13, a target to deliver 980 specialised older person accommodation units between 2022-32 is proposed to be included based on a local needs assessment (i.e. LIN study). This is below the 165 units per annum benchmark figure (2017-29) included in policy H13, but the supporting text of this indicates this figure is designed to inform a local level assessment and this does not take account of a lower older people population growth after 2029. The LIN study is considered a robust assessment of need, based on modelling, good practice and research by experts.</p>

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Development Partners Ltd		<p>Policy HO6 sets out a positive strategy to ensure a sufficient supply of older person accommodation, of the right type, tenure and location is delivered to address local needs, during the plan period. The Local Plan site allocations are expected to provide 81 additional specialised older person accommodation, some permissions have been implemented (since 2021) and further sites will come forward to address older person housing needs. The supporting text of Policy HO6 notes Council owned older person accommodation sites, built in the 1960-80's are expected to come forward for development, to provide new/enhanced older person accommodation to meet the future needs. The NPPF includes no requirement for Plans to specifically allocate sufficient sites to fully address older person housing needs, as it requires policies to reflect the need for housing type, tenure, size based on a needs assessment (para 63)</p> <p>No proposed modifications</p>
In Bell Cornwall obo Old Millhillians	<p>The Plan does not include mechanisms to monitor the delivery of older person homes via the conversion and/adaptation of existing C3 units and there is uncertainty in relation to whether providers would deliver these.</p>	<p>Any proposals that result in a material change of use/conversion from other land uses to older person accommodation will require an application to be submitted. The delivery of these will be monitored through established housing monitoring processes.</p> <p>In compliance with London Plan (D7) and Local Plan policies 10% of new dwellings will be required to be designed to meet wheelchair user dwellings standards of Part M3(3) of the Building Regulations, with the balance (90%) having to meet Part M3(2), namely accessible and adaptable dwellings. These are secured via planning conditions and the compliance of development against these are monitored via building control mechanisms. This ensures those who are elderly or experience any disabilities are able to access developments, live independent lives and remain within their homes throughout their lives, without any major alterations to make them safe/functional.</p> <p>No proposed modifications</p>
Hertsmere Borough Council	<p>Concerned there is a significance reliance on small sites windfalls and unimplemented site allocations/pre-application , each amounting to 25% of total housing requirement . Further, the small sites windfall is tied to the London Plan 10-year housing target and is based on the 2017 SHLAA, which is not up to date and robust to justify the largest element of housing supply.</p>	<p>The London Plan (2021) indicates the small site target (375 dpa) can be considered as a reliable source of windfall housing sites and can contribute towards (para 4.2.3) anticipated future supply to meet the Local Plan housing requirement, in line with the NPPF (para 72).</p> <p>The Harrow Small Sites Capacity Study (2022) indicates circa 300 homes per annum were delivered on small sites (below 0.25ha) between 2010-19. Further, it indicates the small sites identified within this had a potential capacity to deliver between 380 - 478 homes per annum over the Plan period. This provides compelling evidence to justify the inclusion of a small site's windfall allowance (i.e. 375 spa) and demonstrates this will be a reliable source of supply. The local evidence also goes beyond that which is required by the London Plan, further justifying the policy.</p>

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		<p>A statement of common ground has been entered into with Hertsmere which acknowledges the more recent evidence base but maintains their observation that ‘there is a significant reliance on small windfall sites’.</p> <p>No proposed modifications</p>
Hertsmere Borough Council	<p>The Council is seeking to meet the transitional arrangements of the NPPF (2024) to avoid a higher housing target. This , along with other Boroughs with a similar approach will have wider implications for growth across north London, south west Herts and will require close working across all authorities in the area.</p>	<p>The latest Local Development Scheme was published in February 2023 and indicates an intention to submit the draft Local Plan for examination in January 2025. The Council is therefore simply following the timeframes proposed in the LDS, which was published well before the new NPPF was published.</p> <p>Housing targets for the borough are set by the London Plan; any higher target in a subsequent London Plan will become part of the development plan when published in its final form; the statement of common ground entered into with Hertsmere acknowledges this.</p> <p>No proposed modifications</p>
Hertsmere Borough Council	<p>The absence of any requirements to deliver First Homes would be contrary to the NPPF (para 66), planning practice guidance and Ministerial Statement, even though low cost rented homes are more genuinely affordable than first homes. This approach needs to be justified and it should clarify first homes will be accepted as an intermediate housing.</p>	<p>The Local Plan clarifies that First Homes are more expensive than the majority of alternative affordable housing products (including London Living Rent housing) and the delivery of these is not considered appropriate to address the local housing needs. Although NPPF 2024 (para 61) will not apply to the examination of the Harrow Local Plan, this states that the Ministerial Statement of 2021 for First Homes (25% of affordable homes) no longer applies but authorities can choose to accept First Homes if they address local needs.</p> <p>No proposed modifications</p>
Pat Beazley	<p>Concerned the Opportunity Area is expected to accommodate an excessive level of the Borough’s future housing needs (.i.e 50%+ t). Suggest this should be reduced to 35% by spreading growth more evenly, to reduce densities.</p>	<p>The Council considers the Opportunity Area to be the most sustainable location in the borough to accommodate new development; this is reflected in its identification as an Opportunity Area in the London Plan. There is significant need for new housing, and it is appropriate that the most sustainable areas within the borough are fully explored for optimal capacity. This has been done through design-led capacity testing. It is a sustainable decision to locate growth in an area rich in public transport, jobs, and services.</p> <p>No proposed modifications</p>
LB Barnet	<p>LB Barnet supports Harrow’s spatial strategy to make provision for meeting its full identified housing need (16,040 (net) homes during the Plan period.</p>	<p>Support welcomed</p> <p>No proposed modifications</p>
Mayor of London	<p>LBH’s housing target as set out in Table 4.1 the LP2021 is for the delivery of 8,020 new homes between 2019 and 2029 and the draft Plan sets out a clear commitment to meet that target. The draft Plan period starts in 2021, with LBH exceeding their housing target by 454 homes between 2019 and the start of the Plan period in 2021.</p>	<p>Support welcomed</p> <p>Proposed Modification, as suggested by Mayor</p> <p>Amend Para 4.3.7 as below:</p>

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	<p>LBH proposes to deliver a minimum of 16,040 net homes during the Plan period (2021/22-2040/41). This equates to 802 per year on average over the Plan period. The intention to roll forward the housing target beyond the London Plan period is supported. It is noted that proposed changes to national policy are likely to mean a significant increase in London's overall housing need figure. The Mayor is in the process of preparing a new Strategic Housing and Land Availability Assessment (SHLAA) and London Plan which will apportion targets across boroughs. Recognition of this context would be a useful consideration when planning for housing beyond 2029 as well as the new NPPF and the mandatory housing requirement for London of 87,992 homes per year.</p> <p>LBH's small site's target is set out in Table 4.2 of the LP2021 to deliver 3,750 new homes a year up to 2029. This is reflected in the draft Plan which is noted and welcomed. In order to meet that target, LBH should explore all the mechanisms at their disposal to facilitate all sources of housing supply including from small housing site development. LBH is advised to follow the guidance set out in Policy H2B of the LP2021 by preparing site-specific briefs, masterplans and housing design codes for small sites. The Mayor has also published his Small Sites Design Codes LPG1 . Small sites should be considered as a valuable source of housing delivery and should be optimised to contribute towards meeting the borough's housing target. It is noted that LBH consulted on a draft Small Sites Design Code SPD in early 2022 and the Mayor encourages this to be developed and adopted.</p>	<p>In addition, proposals will be required to consider any future local guidance that may be produced to increase the provision of well designed new homes on small sites, such as site specific design briefs, master plans and Design Codes in line with the London Plan Guidance (2023), to support well designed new homes on small sites</p>
<p>Nexus Planning obo Taylor Wimpey</p>	<p>The Draft Plan rolls forward the London Plan 10 year housing target, but no justification is provided to demonstrate this is appropriate or sound.</p> <p>The London Plan housing target (52K homes) is set below the local housing need (65K) figure identified by the standard method. It is based on a capacity of sites identified by an out of date 2017 SHLAA that does not take account of availability of more recent site (.i.e Pinner Farm). The London Plan will be out of date and is due to be reviewed by March 2026, in line with the NPPF (para 33, 2023). The standard method (2024) identified a need to deliver 87K homes per annum across London and the Government expect housing delivery to be boosted to address this.</p> <p>It is inappropriate for the Plan to base its housing requirement / target on the London Plan housing target, given this will become out-of-date. The Local Development Scheme indicates, this would be only two months following the intended adoption of the Local Plan, and likely prior to its adoption if the Plan is delayed in the examination. Further, it would be perverse to adopt a Plan based on a suppressed housing target in a London Plan that will be out of date if not reviewed by March 2026. This would be contrary to para 60 of the NPPF that seeks to boost housing delivery and unsound (Para 35d) .</p> <p>Para 78c of the latest NPPF (2024) , will require a 20% buffer to the supply of deliverable housing sites (.i.e. 6 years) from July 2026, where the housing requirement is 80% /less than the housing requirement calculated using the standard method. The Local Plan is likely to be out of date, as soon as it is adopted.</p>	<p>The Council considers it appropriate to include a housing target of 16,040 within the Local Plan. This approach rolls forward the London Plan (2021) ten year housing delivery target of 8020 (2019-29) for another ten years, to cover the Local Plan period between 2021-41 (.i.e. 15 years from expected 2025 adoption date). This approach complies with the test of soundness included with the NPPF (2023) and is in general conformity with the requirements of the London Plan (2021) due to the following reasons:</p> <p>(1) The PPG makes it clear the Mayor of London is required to set a London wide housing target based on a needs assessment and distributing this between Boroughs via a spatial development strategy (.i.e. the London Plan). The London Plan (2021) makes clear that London should be considered as a single housing market area and that boroughs are not required to carry out their own housing needs assessment (para 4.1.2). Further (para 1.4.1) states " Development Plan Documents are not required to take account of nationally derived local-level need figures." (i.e. figures from standard methodology).</p> <p>(2) The timeframes for producing the Local Plan meets the transitional arrangements included within para 234 of the NPPF (2024), as the Regulation 19 document has already been consulted on (i.e. 4 November to 17 December 2024) and the Plan will be submitted, prior the deadline of 12th of March 2025. Therefore, the Local Plan will be examined against the NPPF 2023 and there is no requirement for it to include a housing requirement based local need figure calculated based on the standard method published December 2024.</p>

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	<p>The implications of including a suppressed housing target are increased affordability issues or residents living in unsuitable accommodation and unsustainable commuting patterns into Borough that is expect to experience significant employment growth , as well as an adverse impact on CO2 emissions and achieving net zero carbon increased commuting.</p> <p>The Plan is unsound as it does not seek to meet the minimum LHN based on a standard methodology (.i.e 2294 dpa for Harrow) and not informed by agreement with other boroughs that any unmet needs will be met (.i.e positively prepared). No proportional evidence has assessed the potential implications of meeting the minimum LHN or coming close to this (not justified). The Plan is not seeking to boost housing delivery to meet the minimum LHN, contrary to the NPPF (para 61, 63).</p> <p>To ensure Policy SP3 is sound suggest the following modification:</p> <p>it must identify a minimum housing requirement consistent, or greater than with minimum LHN derived via the Standard Method at the time of submission; identify an agreement with adjoining authorities to accommodate unmet and specify this within the policy; or demonstrate robustly that exceptional circumstances exist to justify an alternative approach to calculating housing need</p>	<p>(3) The Mayor of London’s representation for the Local Plan supports the Council’s approach of rolling forward the London Plan (2021) ten-year housing delivery target of 8020 homes for another ten years (H1), to equal a housing target of 16,040 over the Plan period (2021-41). It states the “<i>proposed changes to NPPF are likely to mean a significant increase in London’s overall housing need figure (.i.e. 87k dpa). The Mayor is in the process of preparing a new SHLAA and the London Plan which will apportion targets across boroughs</i>”.</p> <p>(4) The Local Plan approach of rolling forward the London Plan 10 year housing target over the remaining of the Plan period has been found sound in other recently adopted Local Plans (i.e. Barnet (2024) and Southwark (2022)).</p> <p>(5) The Council’s Duty to Cooperate Statement demonstrates the Council has worked positively and effectively and an ongoing basis with strategic plan making authorities and relevant bodies; to identify and address any cross boundary strategic matters, in line with the NPPF (para 24-27). Any unmet housing of greater London housing market area will be addressed via a future review of the London Plan (2021).</p> <p>No proposed modifications</p>
Nexus Planning obo Taylor Wimpey	<p>The Plan failed to identify a rationale for discounting the high growth alternative. The Reg 18 document stated 8,410 homes were delivered between 2009-21 (average of 841) and it would be difficult to increase delivery on previously developed sites within the urban area, beyond the London Plan target. This option is likely to require the release of Green Belt or Metropolitan Open Land (or the loss of employment land) and no evidence demonstrates any exceptional circumstances exist to justify this. Further, the site selection paper adds that the development of sites within the Green Belt and MOL would not be in line with the London Plan.</p> <p>The above is contrary to London Plan Inspectors report that indicated the housing target has been set below the level of identified needs and housing delivery can only be increased via a Green Belt Review. It is also contrary to the current version of the NPPF that notes that inability to address housing needs without the release of Green Belt, as an exceptional circumstance for the alteration of the boundaries of this (para 145, 2023).</p> <p>The Council has provided no evidence in support of the Plan (either at Regulation 18 or 19 stages) to demonstrate that an assessment has been carried out to evaluate whether exceptional circumstances would exist to release Green Belt land. Also the Reg 18 document indicated there was not sufficient land available in urban area for addressing the suppressed target.</p> <p>Therefore, exceptional circumstances exist to justify the alteration of the Green Belt, to meet the minimum LHN of the Borough and deliver right type, size of housing (including self build) in line with the NPPF (para 63)</p> <p>To ensure Policy SP3 is sound suggest the following modifications:</p>	<p>See above response to the comment in regard to the inclusion housing requirement based on standard method and unmet needs of the London Housing Market Area (HMA).</p> <p>In line with the London Plan and NPPF, the Local Plan preferred spatial strategy seeks to deliver a minimum of 16,040 homes (2021-41), 1000 jobs and other uses to address local needs; via prioritising the intensification, re-development of previously developed sites for mixed uses, town centre and residential uses within the most sustainable, accessible locations of the area’s existing built-up area, where infrastructure capacity exists. Policy SP3 seeks to prioritise the delivery of new housing within the Harrow & Wealdstone Opportunity area (circa 8,750 homes, 1000 jobs), followed by sites within and the edge of town centres, particularly the larger centres (i.e. major and district centres) and small sites in locations with good transport connectivity and within proximity to town centre boundary (i.e. Metropolitan, Major, District). This will ensure residents have good accessibility, to local facilities, services, employment opportunities via sustainable modes of transport, to reduce carbon emissions and address the climate change.</p> <p>A call for sites was undertaken, as part of the Local Plan Reg 18 consultation, to identify all the potential sites to address the future housing needs of the area. The Councils Site Selection Methodology (2024) document sets out the robust approach undertaken to assess the suitability of all existing allocations, submitted sites for potential allocation within the Local Plan and all the evidence base that informed this process.</p>

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	<p>the spatial strategy must be updated to reflect the minimum level of housing growth required and to include a wider range of sites to deliver the size and type of homes required.</p>	<p>Table H1 of the Local Plan (reg 19) document set out the capacity of all potential sources of housing supply such as sites under construction, sites with extant permission, proposed site allocations, less any completions since 2019 (Table H1). This demonstrates the capacity of all sources of housing supply within the existing urban area is 16,973 homes, which is expected to fully meet the future Borough housing needs (.i.e. 16,040) during the Plan period, as well as provide a 5% buffer to address any shortfall housing delivery during an economic downturn. In line with the NPPF (para 145, 146) and London Plan (2021), it is considered that no exceptional circumstances have been demonstrated to justify the release of Green Belt land to address future housing needs, nor is it necessary to do so as no Green Belt release is proposed.</p> <p>The Council does not agree with the representation's assertion that exceptional circumstances exist to justify green belt release as the Council is meeting its housing requirement as set out in the published London Plan. The narrative from the Inspectors' report is not considered relevant nor does it change the legal position that the London Plan sets housing targets for London boroughs.</p> <p>No proposed modifications</p>
<p>Nexus Planning obo Taylor Wimpey</p>	<p>It is inappropriate for table H1 to include the surplus housing delivery prior to the Plan period in the housing supply due to factors noted above .</p>	<p>Disagree: The London Plan (2021) forms part of the Development Plan for the Borough. Policy H1 of the London Plan (2021) set a borough ten-year housing delivery of 8020 (or 802 dpa) per annum between 2019 -29. The inclusion of past housing over delivery within the Plan is considered to be in general conformity with the London Plan (2021). The Mayor has raised no issues in relation to this.</p> <p>No proposed modifications</p>
<p>Nexus Planning obo Taylor Wimpey (Pinnerwood Farm)</p>	<p>Concerned the spatial strategy seeks to focus delivery additional housing primarily on previously developed land, even though this may adversely impact the delivery of affordable and family housing to address local needs. This is contrary to the NPPF that requires Plans to deliver sufficient land of right type, location to support growth, and deliver of a range of homes of the right, type, tenure and size of to address needs (para 60, 63).</p> <p>The key issues raised are;</p> <p>(1) The Opportunity Area (OA) is expected to accommodate 55% of the Plans target. But the Area Action Plan (AAP) intends to prioritise the delivery of family dwellings in the Wealdstone east and west sub areas. It includes a target to deliver 1315 dwellings (17.5%) of family dwellings in these sub areas. Hence, the OA will fail significantly increase the delivery of family sized housing to address needs</p> <p>(2) The rest of the Borough will deliver high density flatted development on previously developed sites, which will fail to deliver sufficient family sized housing. This view is supported by a review of sample sites included in the trajectory of the AMR 2017-19 and expected to be delivered by 2025. This indicates the historic delivery of sites allocated within the rest of the Borough would not deliver sufficient family housing to achieve the 25% strategic target.</p>	<p>In line with the NPPF (paragraph 123) and London Plan, the Spatial Strategy prioritises the development of previously developed sites in the existing built up area to address housing needs. The Plan is proposing to allocate sites with a range of sizes and settings to address housing needs, including affordable and family sized housing.</p> <p>Policy SP3 set the strategic targets and the Plan include a positive strategy to increase the provision of family sized and affordable housing to address local needs. Policy HO1 seeks to ensure proposals address the housing needs of families by requiring developments to ensure; (a) a minimum of 25% of all new home are family sized (b) It also requires flatted developments to give the highest priority to the provision of accommodation for families, on the lower floors of the scheme, with direct access to a private garden or communal amenity space , as well as seeking to resist developments solely comprising of smaller units This recognises previously developed sites are likely to deliver a high levels of flatted developments. The Plan also includes policies (HO2, 10) to protect loss of family housing via conversions (.i.e. no net loss) and HMO's. Policy HO4 seeks to increase the delivery of affordable housing, via applying the threshold approach.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>(3) Small sites (below 0.25ha) will comprise of 47% of future housing supply and these tend to be unsuitable for family sized dwellings and the delivery of affordable housing (if they are not major developments 10 units or more)</p> <p>To ensure Policy SP3 is sound suggest the following modification:</p> <p>critterion 5B should be updated to reflect the actual need for family housing and to identify this as the requirement.</p>	<p>The policies of the AAP will be superseded by the adoption of the Harrow Local Plan. The Local Plan notes the Council intends to produce masterplans for the Harrow Metropolitan Centre, Wealdstone District Centres and other key areas of the Opportunity Area. This will support the delivery of good design and the sustainable development of this strategic area.</p> <p>The design led capacity evidence, assumed 30% of units within the proposed allocations will be family sized dwellings, when assessing the indicative capacity of the housing site allocations. The Local Plan Viability Study (2024) assessed the impact of the affordable housing target, with 70: 30 split (Social rented: low cost ownership) and ensuring 25% of units are family sized housing. This concludes the proposed housing allocations identified are broadly viable and deliverable</p> <p>No proposed modifications</p>
Sunil Kapoor, Leslie Coombes (standard rep)	<p>Concerned new housing delivery will consist of flats and the Plan will fail to deliver a sufficient level of family sized and social rented homes to address local needs.</p> <p>The provision of social rent homes is conflated with 'affordable' rent homes, which are not necessarily the same. This could obscure the actual provision of social rental homes, which are more affordable than intermediate rent/percentage London Rental</p>	<p>Policies SP3 and HO1 require developments to ensure a minimum of 25% of all new homes are family sized; as well as resists schemes that solely of studio flats or an over concentration of 1/2 bedroom units. The Plan also includes policies to ensure increase the provision of family sized housing (HO2), protect the existing stock and ensure no net loss in existing stock (HO2).</p> <p>Policy HO4 clarifies that low cost rented refers to social rented housing or any other affordable rented products, as defined in London Plan (2021) Policy H6. Policy H4 seeks to increase the delivery of affordable housing in new development, as well as prioritise the delivery social rented housing, to enable lower income groups access suitable housing. It also facilitates alternative 'intermediate' forms of affordable housing tenure, such as London Living Rent, as an alternative to Shared Ownership.</p> <p>The Local Plan Viability Study (2024) indicates the proposed affordable housing target (assuming a 70: 30 split between Social rented: low cost ownership housing) is broadly deliverable over the Plan period.</p> <p>No proposed modifications</p>
Savills obo Whitbread (134 Kenton Road)	<p>The London Plan requires Plans to provide a unit size mix breakdown for affordable housing. However, evidence needs to be provided to justify the inclusion of a specific unit mix for market housing, in line with the NPPF.</p> <p>The target to deliver 25% or more family sized units within all tenures of a scheme is too high. This should consider locally specific factors such as a high saturation of family sized housing in suburban areas. The target is contrary to the LHNA that recognises the role private rental housing for single persons and couples plays for releasing family sized housing.</p> <p>Suggest the policy is amended as below</p>	<p>The LHNA (2024) indicates there is a high priority to increase the provision of family sized housing (3 bedroom/+) to; address the needs of existing and future households (i.e. families with children, multi generation families), to reduce overcrowding, provide housing options that are affordable and suitable for younger families and lower income households. Policies SP3 set the overarching strategic targets to address local needs. The Councils housing register indicates that there is a significant unmet need for family sized housing. Further, the Council is increasingly reliant on emergency temporary accommodation to house homeless families (.i.e. B & B, hotels).</p> <p>In line the above evidence and the NPPF (para 63), Policy HO1 includes a detailed criteria for considering locally specific factors and requires developments to ensure a minimum of 25% (or more) of all new homes, on</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>5.B. Mix of Housing by size: The Council will require developments to include a range of housing sizes to address local need including family-sized housing and smaller units to allow for down-sizing A strategic target has been set to ensure a minimum 25% (4,000) of all new dwellings delivered are three bed (or more) family sized dwellings across the Borough over the plan period.</p>	<p>suitable sites are family sized to address local housing needs , as well as includes flexibility to allow applicants to demonstrate why this cannot be achieved.</p> <p>The policy approach seeks to ensure an appropriate balance is achieved between the need to increase the provision of family housing and a competing set of factors, such as increasing the delivery of housing to address housing needs by optimising the output of sites; the need to consider the site size, constraints, location, area’s character and viability.</p> <p>No proposed modifications</p>
Home Builders Federation	<p>Concerned the Local Plan viability assessment only tested a target of providing 35% affordable housing target in residential schemes, rather than 50%. The 50% target with a 70:30 tenure split between socially rented and intermediate housing will be unviable. This will impact the deliverability of sites and addressing housing needs. It is contrary to the NPPF (58) , as it does not provide a guidance on what may be viable for developers and issue is compounded by other requirements (e.g. BNG) .</p>	<p>The Local Plan Viability Assessment (2024) tested affordable housing contributions in the range of 0-50%, assuming a tenure split of 70: 30 between social rented and intermediate housing, as well as other requirements. This indicates the target is broadly deliverable over the plan period (recognising also the policy incorporates the London Plan ‘fast track’ target of 35%), and applied on a ‘maximum viable proportion’ basis taking site-specific factors into account.</p> <p>Local Plan Policy HO4 will apply the threshold approach included within London Plan policies (H4 , H5) to increase the delivering affordable housing This requires a provision of a minimum of 35% affordable housing, with a tenure split of 70:30 between low cost rented and intermediate housing and consideration of the 50% target to apply the fast-track route. Otherwise, a site-specific viability assessment is required and flexibility included in policy to assess impact of different tenure mix. To address economic uncertainties that may arise over the lifetime of a development, the use of ‘review mechanisms’ will be required, where appropriate, to maximise affordable housing delivery (.i.e. improvements in viability).</p> <p>No proposed modifications</p>
Places for London	<p>The Key issues raised are;</p> <p>(1) The Policy should recognition that taller buildings may be required in well-connected, suburban locations in order to use land efficiently and optimally, and to secure the number of homes required.</p> <p>(2) Unclear why the small sites windfall allowance is applied up to 2036 and not the remaining plan period</p> <p>(3) Part 4 of the policy states new development will be directed to locations, where infrastructure has most capacity. This could clarify that this is in locations with good transport accessibility and within 800m of transport hub or town centre</p> <p>(4) Part 5A of the policy could clarify that genuinely affordable housing includes housing that is affordable to both middle- and low-income earners</p>	<p>(1) The Harrow and Wealdstone Opportunity Area has been identified through the London Plan as a well serviced area with excellent access to transport, amenities and employment. This area has significant potential for regeneration through development which will allow for the reinforcement of infrastructure and the revitalisation of the public realm. More than half of all homes will be built in other areas across the borough throughout the plan period at appropriate heights and densities. The draft Local Plan seeks to ensure the housing required to be delivered as set out in the London Plan.</p> <p>The spatial strategy and evidence identify the Harrow & Wealdstone Opportunity Area as the most appropriate location for tall building development. Policy GR4 does not include an explicit objection in principle to tall buildings outside of the designated areas where planning benefits may merit support.</p> <p>(2) In line with the NPPF (para 72), a conservative approach was taken in relation to the small sites (i.e below 0.25ha) windfall allowance. An allowance of 375</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>homes per annum, based on London Plan Policy H2 (2021) and local evidence was applied; over a 11 year period (.i.e 4,125) from the expected adoption date (2025) rather than for the full 15/16 years of the Plan period (2041). The key reasons for this approach are:(a) The level of homes expected to be delivered on small windfall site during the first three years of the Plan (after adoption) will be already known by sites granted permission and under construction. This avoids the potential double counting the capacity (b) The windfall allowance was not applied for another two years to take account of the potential delay in the adoption of the Plan due to unforeseen reasons. The 11 year period therefore relates to the later part of the Plan Period rather than starting from the date of adoption.</p> <p>(3) Policy H1, H2 of the London Plan (2021), part 3c of Policy SP3 already clarify that residential development should be located within the most accessible locations or within proximity to town centres or transport hubs</p> <p>(4) Part 5a of policy SP3 clarifies that low cost rented and intermediate affordable housing must be genuinely affordable based on an assessment of local costs and incomes. The supporting text of London Plan policy H6 provides definitions for affordable housing products and the range of household incomes they cater for.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>The key issues raised are;</p> <p>(1) The housing targets should run from the expected adoption date of 2025 and not 2019, as this will ensure the Plan will address any past under delivery of housing.</p> <p>(2) Part 4 of the policy indicates that development should be directed to locations where infrastructure capacity exists and protect local character. This should be deleted, as it repeats other policies in the Plan.</p> <p>(3) Excluding sites within PTAL 1-2 is a missed opportunity to deliver additional housing and addressing housing crisis</p> <p>(4) Suburban locations do not have any special character and to set design standards for these higher than conservation areas is unreasonable restrictive. This should be deleted</p>	<p>The London Plan (2021) forms part of the Development Plan for the Borough. Policy H1 of this sets Borough ten year housing delivery target of 8020 (2019 -29), which is proposed to be rolled over for the remainder of the Plan (2021-41). The inclusion of past housing over delivery within the Harrow Plan is considered to be in general conformity with the London Plan (2021). In line with the NPPF (para 22), the plan will cover a minimum of 15/16 years from the expected date of adoption (2025). Further, the Mayor raised no conformity issues in relation to this</p> <p>In line with the presumption in favour of sustainable development included within the NPPF, the Local Plan does not seek to prevent new residential development in locations that have PTAL of 1—2. It sets out a policy framework to ensure a significant proportion of new housing growth is directed to the most sustainable and accessible locations of the Borough. Other issues raised do not relate to soundness matters (i.e. 2, 4).</p> <p>No proposed modifications</p>
Carter Jonas for Barratt London	Support the Councils proposed approach in Draft Policy SP3 to accommodate 16,040 additional homes by 2041, as is informed an evidence-based approach	Support noted
Savills for Unibar	<p>The Brent Plan (2022) designates Kenton Road as an intensification area to direct growth of increased height and density due to its sustainability credentials . Unclear why the Harrow Plan designates Kenton Road a Neighbourhood parade</p> <p>The Plan does not identify Kenton Road as an area to direct growth toward to via a policy provision or designation. This is contrary to the Harrow Characterisation and Tall Buildings</p>	<p>The spatial strategy is to direct the majority of growth into the Harrow & Wealdstone Opportunity Area. However, growth will be supported in sustainable locations outside the Opportunity Area where appropriate to the context within which it is located.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>Study that identifies Kenton Road as a ‘Minor Corridor’, and described as an opportunistic area to intensify and direct growth towards due to its high levels of sustainability (.i.e para 6.2, 6.4). The Plan allocate two sites (16, 17) on Kenton Road, which supports the suitability of Kenton Road as an area to direct growth. This is also supported by study for the intensification of Kenton Road produced by Autor Architects (attached)</p> <p>Suggest Kenton Road should be designated for intensification and part 3B of Policy SP3 is amended as follows:</p> <p>Rest of the Borough: A minimum of 3,165 will be delivered through extant permissions and minor corridors and on allocated sites across the rest of the Borough.</p>	

Policy HO1: Dwelling size mix

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Pat Beazley	Demographic data indicates 32.5% of households are 4 or more people, which means more than 25% of homes should be family sized units. Flats in tall buildings are not suitable for families and more family and affordable homes should be delivered, rather than what is most profitable for developers	<p>The LHNA (2024) indicates there is a high priority to increase the provision of family sized housing (3 bedroom/+) to; address the needs of existing and future households (i.e. families with children, multi generation families), reduce overcrowding, provide housing options that are affordable and suitable for younger families and lower income households. In line with this and the NPPF (para 63), Policy SP3 set the overarching strategic targets to address local housing needs. Policy HO1 includes a criteria for considering locally specific factors and requires developments to ensure a minimum of 25% of all new homes to be family sized, as well as includes flexibility to allow applicants to demonstrate why this cannot be achieved.</p> <p>Part B of this policy recognises the delivery of housing on previously developed sites may comprise of flatted accommodation due to their location within/edge of town centres and the Opportunity Area, transport hubs and viability. Due to this, it requires flatted developments to prioritise the delivery of family sized housing on lower floors. This will ensure families have good access to local services, facilities (e.g.education, healthcare), without the reliance of private vehicles, and delivering mixed and inclusive communities.</p> <p>Overall, the proposed policy approach seeks ensure an appropriate balance is achieved between the need to increase the provision of family housing and a competing set of factors, such as increasing the delivery of housing to address housing needs by optimising the output of sites; the need to consider the site size, constraints, location, area’s character and viability.</p> <p>No proposed modifications</p>
Planning Issues	<p>We recommend that this policy acknowledges that specialist housing for older people developments will deliver smaller unit sizes to enable older people to downsize and release larger underoccupied housing stock for families.</p> <p>We recommend that criteria C (6) of this policy is amended to state include the following additional text:</p> <p>It is recognised that specialist housing for older people will typically include mostly</p>	<p>The supporting text of Local Plan Policy HO6 and the London Plan already acknowledge the role specialized older person accommodation can play to allow downsizing and release the stock of larger underutilised family sized housing.</p> <p>Part C6 of Policy HO01 already acknowledges that proposals it for older person accommodation may comprise of Solely of smaller size units for those with specific</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>smaller unit sizes and the council will therefore assess such applications on a case by case basis and this policy will be applied flexibility to such proposals.</p>	<p>needs, providing applicants demonstrate one-bedroom units are the most appropriate form of accommodation.</p> <p>No proposed modifications</p>
<p>Rolfe Judd obo Tesco Stores Ltd</p> <p>Home Builders Federation</p>	<p>The policy wording is overly restrictive and requiring all tenures to provide 25% family sized units. This will impact viability and deliverability of schemes, particularly high density development in the Opportunity Area that will not be able to comply with this.</p> <p>Policy H10 recognises a higher proportion of 1b/2b units are appropriate for locations close to town centres and a higher transport accessibility and the role these can play to free up family dwellings. This only requires Borough guidance on the size on of units required for low cost rented housing.</p> <p>Suggest policy should be amended to;</p> <p>require the 25% family housing target to apply only to affordable housing and a provide flexibility is provided relating to size of units in market housing, as well as clarify that larger redevelopment promoting mixed use high density schemes in opportunity are unlikely to meet this requirement due to viability issues</p>	<p>The LHNA (2024) indicates there is a high priority to increase the provision of family sized housing (3 bedroom/+) to; address the needs of existing and future households (i.e. families with children, multi generation families), reduce overcrowding, provide housing options that are affordable and suitable for younger families and lower income households. In line with this and the NPPF (para 63), Policy SP3 set the overarching strategic targets to address local housing needs. Policy HO1 includes a criteria for considering locally specific factors and requires developments to ensure a minimum of 25% of all new homes to be family sized, as well as includes flexibility to allow applicants to demonstrate why this cannot be achieved.</p> <p>Part B of this policy recognises the delivery of housing on previously developed sites may comprise of flatted accommodation due to their location within/edge of town centres and the Opportunity Area, transport hubs and viability. Due to this, it requires flatted developments to prioritise the delivery of family sized housing on lower floors. This will ensure families have good access to local services, facilities (e.g.education, healthcare), without the reliance of private vehicles, and delivering mixed and inclusive communities.</p> <p>Overall, the proposed policy approach seeks ensure an appropriate balance is achieved between the need to increase the provision of family housing and a competing set of factors, such as increasing the delivery of housing to address housing needs by optimising the output of sites; the need to consider the site size, constraints, location, area’s character and viability.</p> <p>The Local Plan Viability Study (2024) considered the potential impact of the proposed target for ensuring 25% of units are family sized housing. This concludes the proposed housing allocations identified are broadly viable and deliverable on the basis of the higher sales values being achieved by major developments in Harrow Town Centre and in the Opportunity Area . No proposed modifications</p>
<p>Nexus Planning obo Taylor Wimpey</p>	<p>As evidenced by Lichfields, the ability to deliver family housing on brownfield sites is much more limited than on greenfield sites.</p> <p>The Plan does not provide an appropriate range of sites to deliver the type and size of housing needed to meet its evidenced needs and is likely to be restricted with respect to the provision of new areas of public open space and other community facilities as a consequence of focusing so heavily on the delivery of smaller sites. The Plan does not deliver against its own Strategic Objectives.</p> <p>To achieve the required increase in family homes it is necessary to revisit the spatial strategy to allocate the type of sites that can deliver meaningful amounts of family homes</p>	<p>The Local Plan is proposing to allocate a range of housing sites, sizes and locations, based on sites submissions that are considered suitable, available and deliverable in line with the NPPF 2023 and the London Plan (2021), including within the Green Belt (GB1 RNOH). The Local Plan evidence and table H1, demonstrate the Borough has sufficient housing capacity from a range of sources to fully meet/exceed the future housing requirement of 16k over the Plan period, via prioritising previously developed sites within the existing built-up area. In line with the NPPF para(145-46) and London Plan (2021), it is considered that no exceptional circumstances have been demonstrated to justify the release of Green Belt land to address future housing needs.</p> <p>The Plan includes a range of policies to increase the provision of affordable housing and family sized housing, as well as to protect the existing stock. The Local Plan viability</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		assessment assessed the potential impacts of these, using a typology approach. It concludes that the proposed housing allocations are broadly viable and deliverable based on the higher sales values being achieved by major developments in Harrow Town Centre. No proposed modifications
Nexus Planning obo Taylor Wimpey	To comply with paragraph 63 of the December 2023 version of the Framework, criterion 1i) of Policy HO1 requires modification to reflect the identified need for family homes within the London Borough of Harrow – as set out within the Council’s own LHNA.	Policy HO1 seeks to ensure proposals address the housing needs of families by requiring developments to ensure; a minimum of 25% of all new homes, or more on suitable sites are family sized (.i.e. 3 bed or more units). The approach set out in HO1 seeks to ensure an appropriate balance is achieved between the need to increase the provision of family housing and a competing set of factors, such as increasing the delivery of housing to address local needs by optimising the output of sites; the need to consider the site size, constraints, location, area’s character, viability. It also identifies that a higher rate will be required on suitable sites. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	This policy is too long, complex and should be deleted or split into different policy topics. Having 6 criteria to determine size mix is excessive when it indicates this will be determined on a site by site basis Policy requires two bed two person units to be suitable for 4 persons. This will impact the flexibility of sites to deliver new housing and conflict with policy indicates size mix will be determined on a site by site basis Part C of the policy is unnecessary and add complexity (.i.e. smaller units) The Policy is unlikely to be effective because of the uncertainty. It is not sufficiently justified and unsound. It should be redrafted or deleted	Comments noted. However a lack of detail is provided on why the policy may be unsound or require any changes. The policy already includes flexibility because it allows to demonstrate why their proposal cannot meet the requirement of ensuring the smallest two bed units are capable of accommodating four bed spaces based on the submission of robust evidence. No proposed modifications

Policy HO2: Conversion and redevelopment of dwellings

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	The policy is inconsistent with London Plan Policy T6, as it should acknowledge there may be well connected locations where car parking may not be required. Suggest Policy should be amended as below to address this issue: ‘Make adequate provision for parking and Ensure any car parking is provided in line with Policy M2 and provides safe access to and within the site and not lead to any material increase in substandard vehicular access’.	Agree the policy should be updated, to ensure conformity with London Plan Policy T6. Proposed Modification Amend part 2i of this , as below Make adequate provision for parking and Ensure any car parking is provided in line with Policy M2 and provides safe access to and within the site and not lead to any material increase in substandard vehicular access’.
Greg Dowden / Broadgate Development Partners Ltd	Concerned that restricting schemes to areas with a PTAL of 3-6 will artificially constrain the locations where new housing may come forward and delivery.	The Local Plan Spatial Strategy and Policy HO2 seek to encourage the intensification of existing residential uses, within the most sustainable and accessible locations of the Borough (i.e. PTAL 3-6). This will enable residents to access local facilities and services via sustainable modes of transport, reduce the need for additional car parking and adverse

	<p>The criterias in this policy are excessive, a repetition of other parts of the plan and should be deleted.</p> <p>Part 4 of the policy does not add anything to the Plan.</p> <p>The Policy is unlikely to be effective because of the uncertainty. It is not sufficiently justified and unsound. It should be redrafted or deleted</p>	<p>impact on carbon emissions; as well as help protect the existing stock of family sized housing. This ensures general compliance with London Plan (2021) Policies H1, H2 and consistency with the NPPF in relation to promoting sustainable modes of transport</p> <p>The issues raised have been noted. The respondent has failed to provide details on why the Plan is unsound or changes required.</p> <p>No proposed modifications</p>
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Policy HO3: Optimising the use of small housing sites

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	<p>The policy is inconsistent with London Plan Policy T6, as it should acknowledge there may be well connected locations where car parking may not be required. Suggest Policy should be amended as below to address this issue:</p> <p>‘Ensure sufficient parking is provided on site any car parking is provided in line with Policy M2 to avoid the risk of harm to safe operation of the surrounding highway network and safety of other road users’.</p>	<p>Agree the policy should be updated, to ensure compliance with London Plan Policy T6.</p> <p>Proposed modification</p> <p>Amend part 3d as below:</p> <p>Ensure sufficient parking is provided on site any car parking is provided in line with Policy M2 to avoid the risk of harm to safe operation of the surrounding highway network and safety of other road users’.</p>
Planning Issues	<p>Policy HO3: Optimising the use of small housing sites</p> <p>We support the above policy given that housing for older people proposals are capable of achieving high density development on relatively small sites.</p>	<p>Support noted.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>The key issues raised are:</p> <p>(1) Excluding sites outside of areas with a PTAL 3-6 will constrain the level of housing coming forward and should be deleted.</p> <p>(2) Part 2 may impact housing deliver as development will bring incremental change</p> <p>(3) Criteria in Part 3 will prevent sites coming forward and housing delivery</p> <p>(4) Part 4 conflicts with optimisation of sites without defining what this means or set a criteria. (.i.e. a bench mark to assess this)</p> <p>(5) Part 5 recognises there will be circumstances where the LPA is not meeting it housing delivery target, but it does not set out the contingency measures which may be undertaken and is ineffective.</p>	<p>The Policy seeks to support and direct the delivery additional homes on the small sites within the most accessible/sustainable locations of the Borough (i.e. PTAL 3-6, 800m of a transport hub or town centres), in compliance with policy H2 of the London Plan (2021), to encourage sustainable development. Part 2 simply reflects the charact and design-led approach set out on Part 3. Part 3 the policy sets out a criterion for assessing proposals outside of the locations in Part A. Therefore the policy does not prevent small sites outside of the above locations coming forward for development. There is no need to define what optimisation of small sites means, as this will be determined on a case-by-case basis having regard to site and proposal specific considerations, as well the application of relevant policies in the plan, particularly those impacting upon design.</p> <p>In relation to potential contingency measures, a minor modification has been proposed in relation to the Mayor of London representation to clarify that the Council may produce site specific design briefs, master plans and Design Codes in line with the London Plan Guidance (2023), to boost housing delivery on small sites (see above).</p> <p>No proposed modifications</p>
Home Builders Federation	<p>Part 1 is unsound because it is contrary to national and London Plan policy, it seems to prohibit small sites from being considered outside of the criteria in London Plan (H1), even though National Policy and London Plan does not include any restrictions.</p>	<p>The Policy seeks to support and direct the delivery additional homes on the small sites within the most accessible/sustainable locations of the Borough (i.e. PTAL 3-6, 800m of a transport hub or town centres), in compliance with policy H2 of the London Plan (2021), to encourage sustainable development. Part 3 the policy sets out a criterion for assessing proposals outside of the locations in Part A. Therefore the policy does not prevent small sites outside of the above locations coming forward for development.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>The 800m distance radius a train or tube station, or district centre boundary, is too restrictive, and should be changed to 1km. This is a manageable distance for most people to walk or cycle, except for the most physically impaired</p> <p>Suggest the policy is amended as follows~:</p> <p>a. Small housing developments (any site below 0.25 hectares) delivering a net addition of self-contained dwellings through the optimal and efficient use of land, and in accordance with other relevant the Development Plan Policies, will be supported <u>in all locations in the borough</u>. They will be especially encouraged where they are located in the following areas:</p>	No proposed modifications

Policy HO4 - Genuinely Affordable Housing

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
HARROW CIVIC RESIDENTS ASSOC.	Support the policy approach that seeks to ensure a higher percentage of affordable housing units delivered are social rented housing.	Noted. No proposed modifications
Planning Issues	<p>In line with the NPPG Viability section, we would encourage the council to create a bespoke affordable housing policy in respect of housing for older people development. This policy should recognise that such proposals have different viability characteristics and are managed in different ways to mainstream housing development. The typology often proposes less than 40 dwellings, viability nearly also constrains the viable affordable housing percentage at less than 10% affordable housing meaning that on site delivery is not practicable. Even if 35% affordable housing was viable, in our experience, no registered provider is willing to manage units within a small mixed tenure, age restricted development due to the relatively high service charges associated with the communal areas and lodge manager requirements.</p> <p>Other local authorities such as Fareham, Birmingham, Charnwood, BCP and Swale have applied full exemptions from affordable housing requirements in light of their viability testing showing that it would be unviable to require affordable housing from such proposals as well as the critical need for such housing. In this case, the council's plan wide viability clearly shows that the full 35% affordable housing requirement is not viable.</p> <p>Furthermore, the council commission Housing LIN to undertake a housing needs assessment in 2022 which concluded that the housing needs for older persons housing is different to mainstream housing with 20% of identified need for affordable housing (rented). There is a current identified imbalance of tenures with most of the existing supply in the affordable housing sector.</p> <p>We recommend that criteria Q is added to this policy to include the following additional text:</p> <p>It is recognised that specialist housing for older people will require flexibility in the application of policy requirements due to the nature of such developments. The plan wide viability study acknowledges that older person's housing development has different viability characteristics and may not support 35% affordable housing. This policy will be applied flexibly in relation to affordable housing targets, tenure and commuted sum payments for older persons housing proposals. It is</p>	<p>Policy HO6 is supported by a Local Plan viability study. This utilised a typology approach (including housing for the elderly) to assess the potential impacts of policy requirements (e.g. affordable housing) and obligations (i.e. infrastructure provision) on the viability of development. This concludes there are "variations in the percentages of affordable housing that can be provided, depending on private sales values, scheme composition and benchmark land value". Further, it indicates "the emerging target is broadly deliverable over the plan period (recognising also that the policy incorporates the London Plan 'fast track' target of 35%), and applied on a 'maximum viable proportion' basis taking site-specific circumstances into account.</p> <p>Local Plan Policy HO4 and London Plan Policy H5: Threshold approach will apply to residential proposals. It is considered that these allow sufficient flexibility to determine an appropriate proportion and tenure mix for affordable housing based on viability and other factors, on a site-by-site basis. It should be noted the NPPF (para 58) states "<i>it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage</i>".</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	acknowledged that mixed tenure management on such proposals may not be feasible and therefore the council will work with providers of such housing to ensure proposals may come forward. Criteria N d. in relation to vacant building credit should be deleted as it is not consistent with national policy.	
Pat Beazley	There is a lack of demand for shared ownership products as evidenced by the unsold units in new schemes. Low cost rented affordable housing are required to address needs.	Policy HO4 seeks to increase the delivery of affordable housing, as well as prioritise the delivery social rented housing, to enable lower income groups access suitable housing. It also facilitates alternative 'intermediate' forms of affordable housing tenure, such as London Living Rent, as an alternative to Shared Ownership. No proposed modifications
Pamela Fitzpatrick obo Harrow Law Centre	There is significant need for additional affordable housing, compared to the limited existing supply and past decisions on major schemes have failed to address this shortfall. Issues raised in relation to why a housing crisis exists in Harrow, why new housing is unaffordable and the adverse social consequences of this. No issues of soundness raised .	Comments noted Issues raised are beyond the scope of the Regulation 19 consultation and do not relate to soundness. No proposed modifications
Carter Jonas LLP	Disagree with the proposed requirement for development to provide a tenure split of 70:30 split between low cost rented housing and intermediate housing. Suggest a 60:40 affordable housing split should be retained for sites within the Heart of Harrow (excluding the Heart of Harrow that was secured for the sites; in line with the Area Action Plan. This will provide certainty for the delivery of new homes	The policies of the AAP will be superseded by the New Harrow Local Plan, when this is adopted. In line with London Plan Policy H6, Policy HO4 proposes a 70:30 tenure split between low cost rented and intermediate products, based on the LHNA. London Plan Policy H5: Threshold approach will apply to residential proposals and allows flexibility to determine an appropriate tenure mix for residential schemes based on viability and other factors, on a site-by-site basis. In line with this, Part H of Policy HO4 seeks to prioritise the delivery of social rented housing and sets out all the factors that will be considered. No proposed modifications
Mayor of London	The Mayor of London raised no concerns in relation to the content, the proposed amendments (since Reg 18 consultation) to Draft Policy HO4 and its general conformity with the London Plan (2021)	Support noted. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Affordable housing is a concept that does not appear in the London Plan, NPPG and genuinely affordable housing is undefined. This policy is long and complex, covers too much issues that could be covered in a SPD. It duplicates London Plan policy. It is unlikely to be effective due to uncertainty , unjustified and unsound. It should be deleted or redrafted	The respondent has failed to clearly set out how the policy is unsound or if any amendments are required No proposed modifications

Policy HO5: Housing estate renewal and regeneration

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
CPRE	Green spaces and play areas on estates should be retained and increased to ensure sufficient open space for residents to address their needs (e.g. Grange Farm). These spaces should be protected with Town/Village Green status or Local Green Space designation	The Local Plan policies seek to ensure existing open space provisions are protected and development does not result in any net loss. Policy HO5 however recognises that for estate regeneration schemes there may be exceptional circumstances where a balance may be required between protecting external amenity space and allowing a limited net loss to deliver planning benefits such as an improved phasing / decanting strategy for existing

		<p>residents, improving development viability to deliver a higher quality provision of amenity space, additional affordable/right sized housing or community facilities. The supporting text makes it clear that any potential net losses must be justified by the submission of robust evidence, to determine this. There is a separate process to register town/village green outside the local plan process.</p> <p>No proposed modifications</p>
TfL	<p>To ensure soundness and consistency with the London Plan and to avoid undermining the approach to car and cycle parking, the wording in part 1K should be amended as follows:</p> <p>'Compliance with parking standards set out in Policy M2 should apply unless exceptional local circumstances are demonstrated'.</p>	<p>Agree the policy should be updated, to ensure compliance with London Plan Policy T6.</p> <p>Proposed Modification</p> <p>Amend part 1k o , as below: Compliance with parking standards set out in Policy M2 should apply unless exceptional local circumstances are demonstrated'</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>There is no need for this policy, as the Council are the owner of the estates and can consult communities in line with their policies, as well as this will not apply to majority of applications. The estates that are likely to require regeneration should identified via site allocations</p> <p>This policy is too long and prescriptive, complex. Due to this, it creates uncertainty and if is ineffective and unjustified</p>	<p>The respondent failed to provide any details of why this policy may be unsound or any changes that may be required. The representation is factually incorrect, because housing associations can also own housing estates. Regardless of ownership, estate regeneration proposals will require planning permission and the proposed policy sets out the requirements for such proposals.</p> <p>No proposed modifications</p>

Policy HO6: Accommodation for older people

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Bell Cornwall obo Old Millhillians	<p>The MHCG report "Our Future Homes: Housing that promotes wellbeing and community for an ageing population" (2024) is relevant . This states "(...) a proper assessment and response to levels of need, that there is sufficient site allocation for all forms of Older person housing (OPH) /Later living housing (LLH) and that LPAs make better and more timely choices in planning applications for OPH/LLH. This shift should be underpinned by consistent use of shared definitions, policies, and requirements through the NPPF and NPPG and adopted locally in the Local Plan".</p> <p>The allocation of just two unsuitable sites for older person housing , fails to reverse the national shortfalls in supply. The LIN report concludes the Plan should include a target of 165 unit per annum, based on precedent set by other Boroughs. Other boroughs combined using the London Plan figures, but have a policy to review the need and delivery over time</p>	<p>In line with the NPPF (para 63) and London Plan (2021) Policy H13, a target to deliver 980 specialised older person accommodation units between 2022-32 is proposed to be included based on a local needs assessment (i.e. LIN study). This is below the 165 units per annum benchmark figure (2017-29) included in policy H13, but the supporting text of this indicates this figure is designed to inform a local level assessment and this does not take account of a lower older people population growth after 2029. The LIN study is considered a robust assessment of need, based on modelling, good practice and research by experts.</p> <p>Policy HO6 sets out a positive strategy to ensure a sufficient supply of older person accommodation, of the right type, tenure and location is delivered to address local needs, during the plan period. The Local Plan site allocations are expected to provide 81 additional specialised older person accommodation, some permissions have been implemented (since 2021) and further sites will come forward to address older person housing needs. The supporting text of Policy HO6 notes Council owned older person accommodation sites, built in the 1960-80's are expected to come forward for development, to provide new/enhanced older person accommodation to meet the future needs. The NPPF includes no requirement for Plans to specifically allocate sufficient sites to fully address older person housing needs, as it requires policies to reflect the need for housing type, tenure, size based on a needs assessment (para 63)</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Bell Cornwall obo Old Millhillians	<p>Concerned Policy HO6 indicates specialist C3 and non C3 older person accommodation will be suitable in locations with a PTAL rating of 3-6 and easily accessible to local facilities, services (include health), public transport, even though a significant part of the Borough falls within PTAL 1a and 3.</p> <p>Suggest policy should be amended (as below) to support proposals within edge town and neighbourhood centres, to enable site with a low PTAL but are highly accessible to be considered. This would enable older residents to access to local services and facilities and not be isolated from friends, families or experience difficulties accessing essential services like health care</p> <p><i>“Proposals for specialist C3 and non-C3 older people’s residential accommodation such as care homes and extra care facilities will only be suitable where: it is easily accessible to public transport (PTAL 3-6); shops, services, community facilities (including health) appropriate to the needs of the intended occupiers”.</i></p>	<p>The areas of the Borough that fall within PTAL 3-6 are all located within proximity to the existing town centres or train/tube stations and cover the boundaries of the larger centres. In line with the London Plan (H13), this policy ensures older people have good access to local facilities, services (i.e. health) within town centres, public transport & remain independent and socially connected.</p> <p>Further, the Boroughs neighbourhood centres largely enable residents to fulfil their daily convenience goods needs (particularly in suburban locations), but do not enable good access to local facilities/services due to their locations, scale and the limited number of premises. The inclusion of these as suitable locations for older person accommodation would be contrary to London Plan Policies H1, H2 that seek to divert residential development on previously developed sites within/proximity to the larger town centres (District, major and metropolitan), and H13 due to factors noted above</p> <p>No proposed modifications</p>
Planning Issues	<p>Policy HO4: Genuinely Affordable housing</p> <p>In line with the NPPG Viability section, we would encourage the council to create a bespoke affordable housing policy in respect of housing for older people development. This policy should recognise that such proposals have different viability characteristics and are managed in different ways to mainstream housing development. The typology often proposes less than 40 dwellings, viability nearly also constrains the viable affordable housing percentage at less than 10% affordable housing meaning that on site delivery is not practicable. Even if 35% affordable housing was viable, in our experience, no registered provider is willing to manage units within a small mixed tenure, age restricted development due to the relatively high service charges associated with the communal areas and lodge manager requirements.</p> <p>Other local authorities such as Fareham, Birmingham, Charnwood, BCP and Swale have applied full exemptions from affordable housing requirements in light of their viability testing showing that it would be unviable to require affordable housing from such proposals as well as the critical need for such housing. In this case, the council’s plan wide viability clearly shows that the full 35% affordable housing requirement is not viable.</p> <p>Furthermore, the council commission Housing LIN to undertake a housing needs assessment in 2022 which concluded that the housing needs for older persons housing is different to mainstream housing with 20% of identified need for affordable housing (rented). There is a current identified imbalance of tenures with most of the existing supply in the affordable housing sector.</p> <p>We recommend that criteria Q is added to this policy to include the following additional text:</p> <p>It is recognised that specialist housing for older people will require flexibility in the application of policy requirements due to the nature of such developments. The plan wide viability study acknowledges that older person’s housing development has different viability characteristics and may not support 35% affordable housing. This policy will be applied flexibly in relation to affordable housing targets, tenure and commuted sum</p>	<p>Policy HO6 is supported by a Local Plan viability study, this utilised a typology approach (including housing for the elderly) to assess the potential impacts of policy requirements (e.g. affordable housing) and obligations (i.e. infrastructure provision) on the viability of development. This concludes there are “variations in the percentages of affordable housing that can be provided, depending on private sales values, scheme composition and benchmark land value”. Further, it indicates “the emerging target is broadly deliverable over the plan period (recognising also that the policy incorporates the London Plan ‘fast track’ target of 35%), and applied on a ‘maximum viable proportion’ basis taking site-specific circumstances into account.</p> <p>Local Plan Policy HO4 and London Plan Policy H5: Threshold approach will apply to residential proposals. It is considered that these allows sufficient flexibility to determine an appropriate proportion and tenure mix for affordable housing based on viability and other factors, on a site-by-site basis. It should be noted the NPPF (para 58) states “<i>it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage</i>”.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	payments for older persons housing proposals. It is acknowledged that mixed tenure management on such proposals may not be feasible and therefore the council will work with providers of such housing to ensure proposals may come forward. Criteria N d. in relation to vacant building credit should be deleted as it is not consistent with national policy.	
Hertsmere Borough Council	Recommended the Local Plan viability assessment include an assessment of the viability of providing on or off-site Affordable Housing and/or contributions for older person accommodation. The costs associated with specialist forms of private sector housing may mean a different and potentially lower quantum of Affordable Housing provision and this would need to be acknowledged in either Policy H06 or Strategic Policy 03.	The Local Plan Viability Assessment (2024) has recognised the cost associated with private older person accommodation may differ from other types of accommodation. Hence, it has included a separate typology for older person accommodation tested the potential impact of providing affordable viability on site, based on a tenure split of 70%:30% between social rented and shared ownership housing. In line with the NPPF. Policy HO4 requires onsite provision of affordable housing. London Plan Policy H5 will apply and a viability assessment will be required if issues arise and consider site specific factors at planning applications stage. No proposed modifications
TfL	Support the amendment to part 3e of the policy 'in line with Policy M2', in response with previous comments	Support noted. No proposed modifications
Home Builders Federation	Part 1a of the policy is unsound, as it requires proposals to demonstrate an identified need, even though the London Plan has identified a requirement to provide 165 units per annum	The Local Plan policies have been informed by a Housing LIN study (2022) which assessed the housing needs of older person accommodation, and the Plan seeks to address the needs identified by this. The Policies requires proposals to demonstrate an identified local need because (1) The older person accommodation market is evolving, new products are emerging from this process and it will be important to ensure the proposed accommodation will address local needs (2) The supply, government policy and market can change and the requirement to demonstrate a need can ensure flexibility to avoid risk of policy becoming outdated. (3) It reduces the risk of an oversupply of older person housing, which could compromise addressing the needs of conventional housing for families. No proposed modifications

Policy HO7: Supported and Sheltered Housing

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	Policy is vague to be effective and accurately guide new development. It is unclear how an identified need will be calculated, and regard must be had to any good practices relevant to LPA. The loose wording is unjustified and unlikely to be effective due to uncertainty. Suggest policy should be redrafted or deleted	In line with the NPPF (Para63) and London Plan Policy (H17), Local Plan Policy H07 has been informed by a range of evidence-based documents, such as Housing LIN Study: An assessment of housing needs of older people and adults with care/support needs (2023) and the Housing Strategy (2019). The LIN Study sets out the projected support and care needs. Proposals will be required to demonstrate they will address an identified local need due to (1) A range of sheltered and supported housing products can be provided to address the

		<p>needs of vulnerable, disadvantaged individuals and groups. This will ensure the use/accommodation is appropriate for intended user, so that the specific type of managed care or supervision required can be delivered effectively. (2) The supply, government policy and market can change and the requirement to demonstrate a need can ensure flexibility and can avoid risk of policy becoming outdated. (3) It is important to ensure the proposed to deliver is aligned to the Councils health, social care and housing strategies, to address local needs.</p> <p>The Council received no representations from any providers, raising any viability or deliverability issues relating to this policy</p> <p>No proposed modifications</p>
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Policy HO8: Purpose-built student accommodation

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	<p>It is unnecessarily restrictive in giving priority to sites which are located in proximity to the education facility it may serve, even though the market for student accommodation and needs of education institutions is London wide. This is unreasonable and prevents development. Hence , the policy is not effective due to uncertainty and unjustified.</p> <p>Suggest policy should be redrafted or deleted</p>	<p>Policy HO8 seeks to ensure Purpose Built Student Accommodation (PBSA) proposals prioritise sites located within proximity to an education institution. This will promote the use of sustainable modes of transport, reduce car use and help address climate change</p> <p>The Council received no representations from any PBSA providers or educational institutions , raising any viability or deliverability issues in relation to this policy.</p> <p>No proposed modifications</p>

Policy HO9 - Large scale purpose built and conversions for shared living (LSPBSL)

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Standard Response 1 Sunil Kapoor Nimala Shah Hilary & Leslie Coombes	<p>Standard Response</p> <p>There is a significant shortage of social rented and affordable family housing for purchase. The number of build to rent and large scale purpose built shared living schemes (LSPBSL) should be restricted, as they are not required to provide affordable housing.</p> <p>These types of developments should not be confined to the opportunity area, which already the most densely populated area and experiences social problems (.i.e. drugs, crime and begging) due to these.</p> <p>Suggest LSPBSL and Build to Rent developments are spread more evenly across the Borough, particularly near train stations, more</p>	<p>Build to Rent (BTR) Accommodation provides professionally managed self-contained rental housing developments and are required to provide affordable (i.e. on site) and family housing within the scheme, in compliance with Local Plan Policies. Policy SP3 indicates BTR will be supported within the Opportunity Area, Edgware Major Centre and District Town Centres, as well as to ` support mixed and inclusive communities.</p> <p>The LHNA (2024) did not identify any specific requirements to provide LSPBSL to address any local needs. It identified a high priority to increase the provision of self-contained housing, particularly for family and affordable housing, to address needs. Policy HO9 has been drafted to reflect this, whilst balancing this with the potential benefits of LSPBSL (i.e. increase housing delivery) and expanding the range of housing options within the borough. The Opportunity Area is considered in the most sustainable and suitable location for accommodating LSPBSL products due to factors explained below.</p> <p>No proposed modifications</p>
	Need for LSPBSL developments (criteria Aa)	

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
<p>Savills obo Whitbread (134 Kenton Road)</p>	<p>It is too onerous to require LSPBSL proposals to demonstrate a need based on an assessment of local incomes, rent levels and future demographic to demonstrate a need, as this is included in the SHMA.</p> <p>The LHNA indicates there is no rationale for promoting LSPBSL as an active policy, as Harrow does not have a significant student population and a limited projected rise in younger sharing households. This fails to understand LSPBSL is not targeted at the student population and any specific demographics, even though it is likely to be suitable for the 25-34 age group and single persons.</p> <p>The parameters of “need” referenced in this draft policy fails to acknowledge the demand component of co-living accommodation, as the demographic of this would typically occupy private rentals or shared accommodation. However, the nature of co-living in providing a more social and community-led residential product means it would meet a specific demand which cannot otherwise be met by conventional housing. This would in turn enable the target market to remain in the Borough and attract people into it.</p> <p>There is no need to have an existing large student population in situ to meet demand. Rather, co living is central to meeting housing demand at a strategic level across London anchored in accessibility. It is therefore a key product which plugs the gap for those that are unable to access the housing market through more traditional home ownership – or else are unwilling to do so on the basis that such fails to meet the needs of their lifestyles. The demand for and attraction of co-living accommodation would also result in the freeing up of larger family homes that are occupied by families.</p> <p>Suggest Policy is amended as below:</p> <p>a) Proposals will be required to demonstrate <u>how they are better suited</u> to meeting an identified the local housing need <u>than conventional housing based on local incomes, rent levels and existing/future demographics of the Borough</u></p>	<p>The LHNA (SHMA) did not identify any specific requirements to provide LSPBSL to address any local needs, as the younger population (aged 25-44), single households, and student population are not projected to increase, and the area lacks a significant existing student population. It indicates a high priority to increase the delivery of family sized and affordable housing, as well as a lack of need to provide smaller sized units. Further, the Council’s housing register indicates there is a significant unmet need for family sized housing. Due to this the Council is increasingly reliant on emergency temporary accommodation to house homeless families (i.e. B & B, hotels) due to the acute shortage of family housing</p> <p>In response to the above evidence, Policy HO9 set out a positive approach for LSPBSL proposals. It seeks to achieve a balance between the delivery of smaller LSPBSL units that could increase housing delivery and options to address housing needs, within highly accessible locations of the Borough. It also however seeks to ensure the right, type, size of units are delivered to address higher priority housing needs (i.e. family sized and affordable) and support mixed and inclusive communities.</p> <p>In line with the NPPF (Para 60, 63), Criteria Aa of Policy HO9 ensures a sufficient amount and variety of land comes forward to address the future housing needs of groups with specific requirements in terms of size, tenure and type of housing. The key requirement for the area is self-contained family and affordable housing. It also ensures there is not over supply/over concentration of LSPBSL, if the market conditions change and delivery of self-contained housing is not compromised by the LSPBSL developments within the Opportunity Area that is expected to accommodate a significant proportion of housing needs. In line with the London Plan Policy H16, this will help deliver mixed and inclusive communities) in the Opportunity Area, particularly in parts where a high level of smaller sized units have been delivered, including via prior approvals.</p> <p>No proposed modifications</p>
<p>Third Revolution Projects for Kosy Living (52 -68 Palmerstone Road)</p>	<p>The evidence base does not indicate an increased future demand expected for this type of housing and certainly not one that would result in a concentration that prevents more 'conventional' forms of housing coming forward.</p> <p>There is no evidence that there is already a 'particularly high' demand for this type of housing in the borough; or that current demand for LSPBSL is having a negative impact on neighbourhoods.</p> <p>The evidence demonstrates demand for family housing. HMO’s and flat shares in the suburban area compete with family housing, however LSPBSL provide suitable alternatives that would help free up family housing for families. Therefore, there is no justification for the overly restrictive wording of Policy HO9 and it fails the soundness tests set out in Para 36 of the NPPF.</p>	<p>The Local Plan evidence indicates that a significant level of demand is emerging for LSPBSL units within the Opportunity Area (OA) due to its excellent transport links. This location is expected to play a major role for accommodating the future housing needs of the area, by both the Local Plan and London Plan. The level of demand for LSPBSL schemes within the OA is demonstrated by the number of LSPBSL that have been delivered in recent years, the high number of pre-ap discussions from developers and a significant number of sites that are being promoted for LSPBSL via the call-for-sites process. However, the Local Plan evidence (referred to above) indicates a lack of need for delivering LSPBSL and a significant need for delivering self-contained family and affordable housing. Further, the delivery of significant number of LSPBSL within the OA could compromise the delivery of self-contained housing to address local needs. This would be inconsistent with the NPPF and London Plan Policy H16 that seek to deliver of mixed and inclusive within the OA.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>Part (a) and (b) – this policy requirement is unnecessarily onerous and not applied to other similar forms of managed housing such as Build to Rent (BtR) or student accommodation. Housing need is determined by existing and future demographics and this should form part of the LPA evidence base. As already noted there is no evidence of an overwhelming demand for this form of housing that would justify the stringent wording of this policy. Furthermore this policy requirement over-simplifies the issue to income and affordability matters alone – ignoring other reasons people choose to live in this form of housing such as central location, amenities and community living. This part of Policy HO9 provides an unnecessary restriction and is not positive plan-making.</p>	<p>The Local Plan does not propose a similar approach to LSPBSL, Build to Rent (BTR) and Purpose-Built Student accommodation uses in relation to demonstrating a need. The key reasons are; BTR will deliver self-contained housing, including family and affordable housing (on site), as well as support mixed and inclusive communities. Whilst the London Plan (2021) requires PBSA to have a nomination agreement with universities or education institution, to demonstrate a need. The Borough does not have a high student population and there is a lack of developer interest, which means PBSA are unlikely to compromise delivery of self-contained housing to address local needs.</p> <p>No proposed modifications</p>
<p>HTA obo Tide Construction (Queens house car park)</p>	<p>London Plan policy H16 does not require Applicants to demonstrate how proposals meet housing need. It is also not a requirement of the London Plan LSPBSL LPG published earlier this year.</p> <p>The proposed requirement to demonstrate need is not justified. The policy should be amended to remove this onerous obligation. LBH should instead positively plan for co-living development, establishing how this can be beneficial to overall housing delivery and choice, particularly within sustainable Town Centre locations.</p> <p>Co-living, as a form of rental housing, can play a significant role in freeing up established traditional housing stock, particularly family sized housing. New co-living schemes provide a purpose-built, professionally managed, high quality alternative to HMO accommodation for sharers. Co-living schemes also create the benefit of providing Private Rental Sector ('PRS') sharers with more choice within the Borough, freeing up HMO stock for those seeking low-cost housing or allowing for conversions back to family homes.</p> <p>Suggest criteria Aa should be deleted</p>	<p>The LHNA (SHMA) did not identify any specific requirements to provide LSPBSL to address any local needs, as the younger population (aged 25-44), single households, and student population are not projected to increase, and the area lacks a significant existing student population. It indicates a high priority to increase the delivery of family sized and affordable housing, as well as a lack of need to provide smaller sized units. Further, the Council's housing register indicates there is a significant unmet need for family sized housing. Due to this the Council is increasingly reliant on emergency temporary accommodation to house homeless families (i.e. B & B, hotels) due to the acute shortage of family housing</p> <p>In response to the above evidence, Policy HO9 set out a positive approach for LSPBSL proposals. It seeks to achieve a balance between the delivery of smaller LSPBSL units that could increase housing delivery and options to address housing needs, within highly accessible locations of the Borough. It also however seeks to ensure the right, type, size of units are delivered to address higher priority housing needs (i.e. family sized and affordable) and support mixed and inclusive communities,</p> <p>In line with the NPPF (Para 60, 63), Criteria Aa of Policy HO9 ensures a sufficient amount and variety of land comes forward to address the future housing needs of groups with specific requirements in terms of size, tenure and type of housing. The key requirement for the area is self-contained family and affordable housing. It also ensures there is not over supply/over concentration of LSPBSL, if the market conditions change and delivery of self-contained housing is not compromised by the LSPBSL developments within the Opportunity Area that is expected to accommodate a significant proportion of housing needs. In line with the London Plan Policy H16, this will help deliver mixed and inclusive communities) in the Opportunity Area, particularly in parts where a high level of smaller sized units have been delivered, including via prior approvals.</p> <p>No proposed modifications</p>
<p>Savills obo Dandi Living (Kodak Amin)</p>	<p>Savills research indicates strong demand for co-living products across the UK, with a particularly strong market in London. Folk Co-living recently launched their new scheme in Battersea (known as Florence Dock), which provides 270 co-living units. The scheme had a waiting list of 2,000 people even before its official launch. Dandi's</p>	<p>The London Plan (2021) state "Large-scale shared living developments may provide a housing option for single person households who cannot or choose not to live in self-contained homes or HMOs".</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>scheme in Wembley leased all of its 360 beds in just 3 months, whilst Folk's scheme in Earlsfield let 315 beds in 4 months. It is clear that there is high demand for co-living accommodation in urban areas of London such as this, and this is particularly relevant against a backdrop of a multitude of push factors towards co-living, including increasing cost of living, high house prices and rental prices in the PRS, lack of available rental stock (recent research by London School of Economics has found that the number of rental properties for sale that were previously rented has increased from 9% in 2018 to over 40% in 2022), and pull factors like all-inclusive bills, flexible lease lengths and extensive amenities and social spaces.</p> <p>Notwithstanding the above, section 4.9.6 states that the Draft Local Housing Needs Assessment fails to identify any specific housing needs in relation to LSPBSL. This is not considered to be accurate as it is unlikely that the specific need for LSPBSL can be isolated from the general housing needs of single-person households, couples or other young professionals and students. Rather, it should be considered that LSPBSL could meet the needs of all these groups, which represents a wide demographic and significant proportion of the housing market in the Borough, neighbouring boroughs and across London.</p> <p>It is considered appropriate to remove 'identified' from subsection (a) as it is considered that any LSPBSL application will be able to develop its own assessment of the housing need that the proposal will be able to meet. Suggest Part Aa is amended as below:</p> <p>a) Proposals will be required to demonstrate how they are meeting an identified local housing need based on local incomes, rent levels and existing/future demographics of the Borough (NB above is from Reg 18 representation)</p>	<p>The LHNA (SHMA) did not identify any specific requirements to provide LSPBSL to address any local needs, as the younger population (aged 25-44), single households, and student population are not projected to increase, and the area lacks a significant existing student population. It indicates a high priority to increase the delivery of family sized and affordable housing, as well as a lack of need to provide smaller sized units. Further, the Council's housing register indicates there is a significant unmet need for family sized housing. Due to this the Council is increasingly reliant on emergency temporary accommodation to house homeless families (i.e. B & B, hotels) due to the acute shortage of family housing</p> <p>In response to the above evidence, Policy HO9 set out a positive approach for LSPBSL proposals. It seeks to achieve a balance between the delivery of LSPBSL units that could increase housing delivery and options to address housing needs, within highly accessible locations of the Borough. It also however seeks to ensure the right, type, size of units are delivered to address higher priority housing needs (i.e. Family sized and affordable) and support mixed and inclusive communities.</p> <p>In line with the NPPF (Para 60, 63), Criteria Aa of Policy HO9 ensures a sufficient amount and variety of land comes forward to address the future housing needs of groups with specific requirements in terms of size, tenure and type of housing. The key requirement for the area is self-contained family and affordable housing. It also ensures there is not over supply/over concentration of LSPBSL, if the market conditions change and delivery of self-contained housing is not compromised by the LSPBSL developments within the Opportunity Area that is expected to accommodate a significant proportion of housing needs. In line with the London Plan Policy H16, this will help deliver mixed and inclusive communities) in the Opportunity Area, particularly in parts where a high level of smaller sized units have been delivered, including via prior approvals.</p> <p>No proposed modifications</p>
	Demonstrate Affordability of LSPBSL (criteria Ab)	
Savills obo Whitbread (134 Kenton Road)	<p>Subsection (b) of draft policy requires applicants to demonstrate the affordability of the proposed shared-living accommodation with alternative products within the Harrow private rental sector. By its very nature, shared living accommodation which prioritises social interactions and curated communal amenity spaces, has no comparable alternative that would allow for objective rent comparisons. The rents occupants would pay in shared-living accommodation would typically cover bills, services and full use of these facilities – whereas a single room in a house-share would be commensurately cheaper as a result of respective rents covering an occupant's room only.</p> <p>Whilst a market-led comparison of shared-living rents versus private rents can be presented in an application (as part of subsection (a) for example), using this as a benchmark to assess the latter's "affordability" in its own right would be imbalanced. It is therefore suggested subsection (b) is removed.</p>	<p>The Council is aware the rent of LSPBSL products can be include all costs and a wide range of facilities on-site. Whilst the rent of a room in shared house can include all costs, but the quality of two products may differs. This requirement is intended to understand the comparative role LSPBSL can play with respect to housings options / costs rather than necessarily being a direct comparison.</p> <p>The LHNA and completed developments within the Borough indicates LSPBSL tend to be significantly more expensive and less affordable than the alternative private rental products (.i.e. HMO, Flat/house shares). Hence, Criterion Ab seeks to ensure applicants provide evidence in relation to the affordability of LSPBSL products in contrast to alternative products in the private rental sector. This is an important consideration for assessing whether the LSPBSL products will address a local need and whether this will help release the stock of family sized units that are used as HMO or shared houses/flats.</p>

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	Suggest criteria Ab should be deleted	No proposed modifications
Third Revolution Projects for Kosy Living (52 -68 Palmerstone Road)	This policy requirement is unnecessarily onerous and not applied to other similar forms of managed housing such as Build to Rent (BtR) or student accommodation. Housing need is determined by existing and future demographics and this should form part of the LPA evidence base. As already noted there is no evidence of an overwhelming demand for this form of housing that would justify the stringent wording of this policy. Furthermore this policy requirement over-simplifies the issue to income and affordability matters alone – ignoring other reasons people choose to live in this form of housing such as central location, amenities and community living. This part of Policy HO9 provides an unnecessary restriction and is not positive plan-making	<p>The Local Plan evidence indicates that a significant level of demand is emerging for LSPBSL units within the Opportunity Area (OA) due to its excellent transport links. This location is expected to play a major role for accommodating the future housing needs of the area, by both the Local Plan and London Plan. The level of demand for LSPBSL schemes within the OA is demonstrated by the number of LSPBSL that have been delivered in recent years, the high number of pre-applications discussions from developers and significant number of sites that are being promoted for LSPBSL via Local Plan call-for-sites process</p> <p>The LHNA and completed developments within the Borough indicates LSPBSL tend to be significantly more expensive and less affordable than the alternative private rental products (i.e. HMO, Flat/house shares). Hence, Criterion Ab seeks to ensure applicants provide evidence in relation to the affordability of LSPBSL products in contrast to alternative products in the private rental sector. This is an important consideration for assessing whether the LSPBSL products will address a local need and whether this will help release the stock of family sized units that are used as HMO or shared houses/flats.</p> <p>The Local Plan does not propose a similar approach to LSPBSL, Build to Rent (BTR) and Purpose-Built Student accommodation uses in relation to demonstrating a need. They key reasons are; BTR will deliver self-contained housing, including family and affordable housing (on site), as well as support mixed and inclusive communities. Whilst the London Plan (2021) requires PBSA to have a nomination agreement with universities or education institution, to demonstrate a need. The Borough does not have a high student population and there is a lack of developer interest, which means PBSA are unlikely to not compromise delivery of self-contained housing to address local needs.</p> <p>No proposed modifications</p>
HTA obo Tide Construction (Queens house car park)	<p>Criteria b) of Policy HO9 requires Applicants to demonstrate the affordability of the proposed offer within the scheme compared with alternative products within the Borough’s private rental sector. Firstly, it should be recognised that co-living is an alternative form of housing with a payment in lieu required for affordable housing. It is not defined as an affordable product and should be treated no differently in policy terms to other forms of private rental housing.</p> <p>Co-living provides residents with flexible rental arrangements with reduced upfront costs, including deposits and furnishing costs. Our client has commissioned research into local demand for co-living within Harrow as part of the ongoing pre-application process for the Site with the LPA. This has demonstrated that co-living provides good quality, purpose-built accommodation that is affordable compared with other PRS property types, offering good value for money. Once all costs are considered, there is evidence to suggest that Harrow’s existing co-living developments operate with a 12% lower overall cost to residents than traditional new build studio comparisons and 20%</p>	<p>The Council is aware the rent of LSPBSL products can be include all costs and a wide range of facilities on-site. Whilst the rent of a room in shared house can include all costs, but the quality of two products may differs. This requirement is intended to understand the comparative role LSPBSL can play with respect to housings options / costs rather than necessarily being a direct comparison.</p> <p>The LHNA and completed developments within the Borough indicates LSPBSL tend to be significantly more expensive and less affordable than the alternative private rental products (.i.e. HMO, Flat/house shares). Hence, Criterion Ab seeks to ensure applicants provide evidence in relation to the affordability of LSPBSL products in contrast to alternative products in the private rental sector. This is an important consideration for assessing whether the LSPBSL products will address a local need and whether this will help release the stock of family sized units that are used as HMO or shared houses/flats.</p>

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	<p>less than like for like tenants living in Build to Rent (BTR) properties in the Borough. Criteria b) of Draft Policy HO9 should be brought into alignment with relevant criteria set out in Policy H16 and any reference to affordability deleted prior to submission for examination.</p> <p>Suggest criteria Ab should be deleted</p>	<p>No proposed modifications</p>
Scape Living	<p>These representations are submitted by Scape Living a highly experienced developer and operator of residential accommodation, including “large scale purpose built-shared housing” and other forms of specialist housing.</p> <p>Scape supports the decision to include Policy HO9 in the new Local Plan which provides a much-needed policy context for schemes delivering large-scale purpose-built shared housing (“LSPBSL”) recognising that such forms of accommodation form a strategically important part of London’s housing offer which meets distinct housing needs and reduces pressure on other elements of the housing stock.</p> <p>LSPBSL has the potential to make a meaningful contribution towards meeting both Harrow and London’s wider housing needs, as also recognised by The London Plan (2020). In general, we support the criteria set out in Draft Policy HO9 which we consider will help to secure high-quality purpose-built shared housing schemes in appropriate locations.</p> <p>However, we object to the following elements of the draft policy which we consider need to be re-drafted to reflect national guidance, The London Plan and the Council’s evidence base:</p> <p>Part (b) – we support the requirement under part (a) of the draft policy that proposals for shared living will be required to demonstrate how they are meeting local housing needs. However, as a form of market housing, we do not consider the requirement under part (b) to demonstrate the affordability of LSPBSL compared to alternative products within the private rented sector is appropriate or justified.</p> <p>Specifically, as a form of market housing, it would be inconsistent with other forms of housing development to require an applicant to demonstrate the affordability of its proposal other than in the context of viability discussions.</p> <p>Accordingly, we do not consider that this element of the draft policy is sound and should be deleted.</p>	<p>The Council is aware the rent of LSPBSL products can be include all costs and a wide range of facilities on-site. Whilst the rent of a room in shared house can include all costs, but the quality of two products may differs. This requirement is intended to understand the comparative role LSPBSL can play with respect to housings options / costs rather than necessarily being a direct comparison.</p> <p>The LHNA and completed developments within the Borough indicates LSPBSL tend to be significantly more expensive and less affordable than the alternative private rental products (i.e. HMO, Flat/house shares). Hence, Criterion Ab seeks to ensure applicants provide evidence in relation to the affordability of LSPBSL products in contrast to alternative products in the private rental sector. This is an important consideration for assessing whether the LSPBSL products will address a local need and whether this will help release the stock of family sized units that are used as HMO or shared houses/flats.</p> <p>Other forms of conventional housing (compared to LSPBSL schemes) provide self-contained accommodation, that meet internal space standard and can be range of sizes, types, tenures and provide onside affordable housing; in order to address local needs and deliver mixed and inclusive communities. Hence, a differentpolicy approach to LSPBSL is required.</p> <p>No proposed modifications</p>
	<p>Location for LSPBSL (Criteria Ac)</p>	
Savills obo Whitbread (134 Kenton Road)	<p>This requires co-living developments to be located only within the boundaries of Harrow Metropolitan centre and Wealdstone District Centres which forms part of the Opportunity Area. This is considered to be contradictory to London Plan Policy H16 which otherwise agrees that such developments would work well and could be supported in any location that is well-connected with good access to local amenities. The London Plan’s Large-scale Purpose-built Shared Living LPG goes further, noting that areas that are likely to be more suitable for co-living developments include “all</p>	<p>In compliance with the London Plan Policy T6, Policy GR4: Building Heights and LSPBSL LPG, the Local Plan is proposing to direct LSPBSL that are car free developments within the boundary of the Opportunity Area (OA). In line with the London Plan (2021), the Opportunity Area is proposed to accommodate a significant level of the Borough’s housing and employment needs. It contains a Metropolitan and District Town Centre, the Station Road corridor that connects these, as well as two railway stations and a Bus Station. This location is considered to be the most</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>areas of PTAL 5 or 6 and Inner London PTAL 4” and “other town centres with a high or medium growth potential”. It is therefore considered unjustified to restrict co-living developments only to Harrow Metropolitan centre and Wealdstone District Centres</p> <p>Suggest Reg 18 Policy text (criteria c) is amended as follows: Proposals should be located within areas the boundaries of Harrow Metropolitan Centre and Wealdstone District Centre (with a PTAL of 4 5-6 and demonstrable good access to local amenities.)that form part of the Opportunity Area</p>	<p>sustainable locations for accommodating high density LSPBSL developments, as well accessing public transport (i.e. large part within PTAL 5-6), local services, facilities and employment opportunities within the Borough and wider area (central London).</p> <p>No proposed modifications</p>
Savills obo Dandi Living (Kodak Amin)	<p>We recognise that one change has been made to this policy within the latest draft Plan, whereby criteria A (c) has been amended to allow for co-living developments to be located anywhere within the boundary of the Harrow and Wealdstone Opportunity Area. Whilst this is welcomed, as set out within our Regulation 18 representations, there are other areas, including designated town centres which have high public transport accessibility and level of local services and amenities which would not fall within the criteria, but would be able to support LSPBSL. An amendment to this subsection is proposed in the below text box, to include district centres as well as areas of PTAL 4 and above, which would be considered to be highly accessible</p> <p>Suggest Policy is amended as follows:</p> <p>Proposals should be located within any of Harrow’s designated town centres, areas of <u>PTAL 4 or above</u>, or within the boundaries of the Harrow and Wealdstone Opportunity Area</p>	<p>In compliance with the London Plan Policy T6, Policy GR4: Building Heights and LSPBSL LPG, the Local Plan is proposing to direct LSPBSL that are car free developments within the boundary of the Opportunity Area. In line with the London Plan (2021), the Opportunity Area is proposed to accommodate a significant level of the Borough’s housing and employment needs. It contains a Major and District Town Centre, the Station Road corridor that connects these, as well as two railway station and a Bus Station. This location is considered to be the most sustainable locations for accommodating high density LSPBSL developments, as well accessing public transport (.i.e. large part within PTAL 5-6) , local services, facilities and employment opportunities within the Borough and wider area (central London).</p> <p>No proposed modifications</p>
HTA obo Tide Construction (Queens house car park)	<p>Support Part Ac of the Policy HO9 which requires LSPBSL schemes to be located within the Opportunity Area. This is the most sustainable location for such uses and has excellent transport connectivity, as well as will support the regeneration of the town centre. This is consistent with Policy H16 (A3) and positively responds to the LSPBSL London Planning Guidance on the locational and access considerations of LSPBSL</p>	<p>Support noted</p> <p>No proposed modifications</p>
Third Revolution Projects for Kosy Living (52 -68 Palmerstone Road)	<p>Although it is reasonable to limit LSPBSL to a specific area (as per the London Plan guidance), we would suggest a more consistent approach across the Local Plan and either adopting similar wording to Policy HO8 for purpose built student housing; or increasing the defined areas available as per build to rent Policy HO3(Part G). This would be more appropriate and consistent wording across the Local Plan. This part of Policy HO9 is inconsistent with the document as a whole and is not positive plan-making.</p>	<p>Policy SP3 indicates Build to Rent (BTR) developments will be supported within the Opportunity Area, Edgware Major Centre and District Town Centres. It is not appropriate to adopt this approach for LSPBSL. The key reasons are; BTR deliver self-contained residential units and can help address local needs for affordable and family sized housing. BTR deliver affordable housing onsite, which will help create mixed and inclusive communities. Whilst LSPBSL schemes provide non-self-contained accommodation for single persons and are required to provide a financial contribution for the provision of affordable housing units of site.</p> <p>Policy HO8 indicates Purpose built Student accommodation (PBSA) should be on; well-connected sites; within or at the edge (300m) of town centres. It is not considered appropriate to adopt this approach to LSPBSL due to (1) The LHNA indicates the borough does not have a significant student population and is not anticipating significant projected increase. There is no evidence to suggest a high level of developer interest in delivering PBSA in the Borough, which may compromise the delivery of self contained housing, to address local needs.</p> <p>No proposed modifications</p>

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HTA obo Tide Construction (Queens house car park)	<p>Test for over concentration of LSPBSL schemes (criteria Ad)</p> <p>Criteria d) of Draft Policy HO9 outlines that there must not be two LSPBSL schemes within a 250m walking distance of each other to avoid an over-concentration of similar uses. Applicants will be required to demonstrate exceptional circumstances and provide robust evidence addressing several criteria to justify a departure from this requirement.</p> <p>We recognise that this policy position is informed by the new GLA LSPBSL LPG and is focused on ensuring the delivery of mixed and inclusive neighbourhoods that don't create an overconcentration of certain housing typologies. However, new guidance states that ideally, Local Plans should identify where spatial or delivery concentrations of LSPBSL (relative to conventional housing) may be emerging and impacting the ability to ensure mixed and inclusive neighbourhoods. Critically, the LPG is clear in stating that any policy should be sufficiently flexible to ensure any limits are not applied arbitrarily.</p> <p>Suggest in developing a positively prepared policy position (Nb referring Reg 18 version of policy), LBH should</p> <p>identify suitable areas where co-living would be beneficial as part of the overall spatial strategy.</p> <p>developing suitable flexibility within the wording of Policy HO9 (Part D) and deleting a prescriptive walking distance to define overconcentration, along with the evidence requirements outlined in Part D (i) (ii) (iii) which isn't justified and imposes overly restrictive tests for alternative uses.</p>	<p>In compliance with the London Plan LSPBSL LPG (2024), Policy HO9 is proposing to introduce a 250m distance (criteria d) to test to assess the over concentration of such uses within the Opportunity area. It should be noted this criteria includes an element of flexibility, as it allows applicants to demonstrate that appropriate alternative uses would not be unsuitable and viable. The key reasons to justify the inclusion of criteria are:</p> <p>(1) The Local Plan evidence indicates a emergence of a significant level of demand for LSPBSL units within the Opportunity Area (OA). For example, a number of LSPBSL schemes have been delivered in recent years, a high number of pre-application discussions from developers and a significant number of sites that are being promoted for LSPBSL via the call-for-sites process are for LSPBSL; a significant majority of which are within the Opportunity Area.</p> <p>(2) There is a concern that without the inclusion of this test, a high level of LSPBSL may be delivered in the Opportunity Area, even though the LHNA and other evidence have demonstrated a lack of need for these, and the priority need is for self-contained housing (particularly family and affordable housing). Further, housing monitoring data indicates a significant number of smaller sized residential units have been delivered in the Opportunity area (including via the prior approval route).</p> <p>Therefore, there is a concern that the over concentration of LSPBSL (without the 250m test safeguard) would compromise the delivery of self-contained residential accommodation, including addressing priority needs for family and affordable to address local needs. This will adversely impact the creation of mixed and inclusive communities within the Opportunity Area. In addition, this issue would also compound by the fact that LSPBSL are not required to deliver any affordable housing onsite. Therefore, the alternative approach to the preferred approach, would be contrary to NPPF and Policy H16 of the London Plan.</p> <p>No proposed modifications</p>
Third Revolution Projects for Kosy Living (52 -68 Palmerstone Road)	<p>(d) – this is a wholly unnecessary restriction to development with no evidence to support the arbitrary 250m requirement. This policy provides another hurdle to development that is unjustified. LSPBSL is retained in single ownership and therefore it is in the applicants long term interest to ensure it as a viable business model in terms of proximity to nearby competition. BTR and Student Housing are a similar forms of managed housing in single ownership, however the Local Plan does not subject these to the same spatial limitations. If there is an evidence based concern that conventional housing is being crowded out by a concentration of alternative housing (inc. LSPBSL, BtR etc.), then the wrong metric is being applied in this policy - density is not controlled by an arbitrary linear measurement but rather by the proportion of 'conventional' housing to 'alternative' forms of housing as a whole. Finally, in the event that this form of housing is no longer needed, part (h) will ensure that it can be re-purposed to conventional housing. This part of Policy HO9 provides an unnecessary restriction and is not positive plan-making</p>	<p>In compliance with the London Plan LSPBSL LPG (2024), Policy HO9 is proposing to introduce a 250m distance (criteria d) to test to assess the over concentration of such uses within the Opportunity area. It should be noted this criteria includes an element of flexibility, as it allows applicants to demonstrate that appropriate alternative uses would not be unsuitable and viable. The key reasons to justify the inclusion of criteria are:</p> <p>(1) The Local Plan evidence indicates a significant the emergence of a significant level of demand for LSPBSL units within the Opportunity Area (OA). For example, a number of LSPBSL schemes have been delivered in recent years, a high number of pre-application discussions from developers and a significant number of sites that are being promoted for LSPBSL via the call-for-sites process are for LSPBSL; a significant majority of which are within the Opportunity Area.</p>

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		<p>(2) There is a concern that without the inclusion of this test, a high level of LSPBSL may be delivered in the Opportunity Area, even though the LHNA and other evidence have demonstrated a lack of need for these, and the priority need is for self-contained housing (particularly family and affordable housing). Further, housing monitoring data indicates a significant number of smaller sized residential units have been delivered in the Opportunity area (including via the prior approval route).</p> <p>Therefore, there is a concern that the over concentration of LSPBSL (without the 250m test safeguard) would compromise the delivery of self-contained residential accommodation, including addressing priority needs for family and affordable to address local needs. This will adversely impact the creation of mixed and inclusive communities within the Opportunity Area. In addition, this issue would also compound by the fact that LSPBSL are not required to deliver any affordable housing onsite. Therefore, the alternative approach to the preferred approach, would be contrary to NPPF and Policy H16 of the London Plan.</p> <p>No proposed modifications</p>
Scape Living	<p>Part (f) – we support the Council’s objective to maximise the delivery of housing in the borough which LSPBSL would contribute towards.</p> <p>Accordingly, as a form of residential accommodation which contributes towards housing numbers (and local needs), we do not consider it appropriate to exclude LSPBSL from development sites which have been identified as suitable for housing. We support the requirement to demonstrate that LSPBSL must contribute towards local housing needs (ie. part (a) of the draft policy), but consider that part (f) which presumes that LSPBSL is not appropriate on sites allocated for housing should be deleted as this is likely to prejudice the Council meeting its overall housing targets.</p>	<p>The LHNA did not identify any specific requirements to provide LSPBSL to address any local needs, as the younger population (aged 25-44), single households, and student population are not projected to increase, and the area lacks a significant existing student population. It indicates a high priority to increase the delivery of family sized and affordable housing, as well as a lack of need to provide smaller sized units. Further, the Council’s housing register indicates there is a significant unmet need for family sized housing. Due to this the Council is increasingly reliant on emergency temporary accommodation to house homeless families (i.e. B & B, hotels) due to the acute shortage of family housing.</p> <p>In response to the above evidence, Policy HO9 set out a positive approach for LSPBSL proposals. It seeks to achieve a balance between the delivery of smaller LSPBSL units that could increase housing delivery and options to address housing needs, within highly accessible locations of the Borough. It also however seeks to ensure the right, type, size of units are delivered to address higher priority housing needs (i.e. Family sized and affordable) and support mixed and inclusive communities.</p> <p>Part f of Policy HO09 seeks to prioritise the delivery of self-contained housing on allocations and the delivery of LSPBSL do not compromise the Councils ability to ensure new developments are addressing priority housing needs. Part f already includes flexibility in relation to this requirement, if it can be demonstrated viability issues with the delivery of alternatives products to LSPBSL</p> <p>No proposed modifications</p>
HTA obo Tide Construction (Queens house car park)	Flexible workspace and amenities	<p>The need to deliver flexible workspace and publicly accessible amenities, are important for achieving local plan objectives (i.e. inclusive communities, vitality/viability of centres, employment generation) and ensure LSPBSL are promoting the sustainable development. They also provide a satisfactory</p>

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	<p>Criteria A (g) of Draft Policy H09 sets out that the ground floor of any LSPBSL scheme should be designed and located to provide active street frontage or public realm. It must include:</p> <p>(a) Flexible Workspace (b) Public amenities (e.g. restaurants, cafes, leisure facilities) that are accessible to the wider public, to integrate into the surrounding area, as well as develop inclusive and sustainable communities.</p> <p>The delivery of active street frontage remains key to developing successful development proposals, particularly in town centres, and isn't exclusive to co-living schemes or a singular typology. Part G adds an overly prescriptive set of requirements that are being applied in an arbitrary way. This fails to recognise the need for sites to respond to need for workspace and public amenity on a site-by-site basis. It also fails to recognise the constraints some sites can have, particularly in urban locations where the provision of these facilities cannot be satisfactorily accommodated to serve their desired purpose. The policy wording should be amended to be aspirational to ensure viability and the deliverability of Policy HO9.</p> <p>Notwithstanding, Tide Construction's co-living model seeks to foster a sense of community through social events and developing successful ground floor uses which positively interact with the wider area and delivers on the draft criteria. Communal spaces are designed around the entrance to enable events to engage residents as they arrive and leave the building. Communal spaces are prioritised for use and times when residents are likely to be open to engaging with other residents and are designed to be flexible enough for the community to grow. Communal areas include co-working and working from home spaces, communal catering spaces and social events space and wellness centre (including gym and classroom). Ground floor uses are often public facing to ensure integration with the wider public realm and enhance activity within the street.</p>	<p>environment for residents who increasingly work remotely/flexibly and require more space than the smaller private living area, as well as support modern employment arrangements. Flexible workspace is an important aspect for the successful functioning of LSPBSL developments, as well as ensuring integration with wider neighbourhood.</p> <p>The policy text already clarifies that public amenities should be provided in suitable locations and therefore already addresses the points raised in the representation.</p> <p>No proposed modifications</p>
	<p>Flexible design and layout (criteria Ah)</p>	
<p>Savills obo Whitbread (134 Kenton Road/Kodak Admin)</p> <p>Savills obo Dandi Living (Kodak Amin)</p>	<p>Subsection (h) of the draft policy requires shared-housing proposals to demonstrate potential capabilities in converting to Class C1 (hotel) or Class C3 uses in the future without the need for demolition and rebuild. Whilst a capability to convert to C1 is considered feasible given similarities in internal layouts; programming in the capability to convert to C3 is considered problematic. By its very nature, C3 dwellings require different servicing and fire management strategies from that of a shared-living or hotel building so it would be unduly onerous on the final design if a shared-living building is to be capable of adaption to C3.</p> <p>Suggest policy (Ah) should be amended as follows:</p> <p>h) To support a circular economy, proposals must demonstrate a flexible design and layout to allow the LSPBSL scheme to be converted/retrofitted to an C1 hotel or C3 self-contained residential uses, or other town centre uses without the need for substantial demolition and rebuild</p>	<p>The requirement to demonstrate a flexible design/ layout for LSPBSL, to allow the easily conversion/ retrofit it into a C1 hotel or a residential use, is in line with the London Plan (2021), which seeks to promote a circular economy to reduce waste, carbon footprint and climate change.</p> <p>LSPBSL schemes may require a different servicing and management strategies, but no evidence/detail has been provided to demonstrate how this impact the potential / retro-fitting of this to a C3 use. We are aware that Government is intending to require tall buildings above 18m/7storeys to include a second stairway for fire safety reasons.</p> <p>No proposed modifications</p>

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Third Revolution Projects for Kosy Living	(h) – this policy underlines the onerous spatial policies of parts (a), (b), (c), and (d). In the event that the development is not needed, it would ensure that the building can be repurposed to ‘conventional’ housing; and far more readily than other forms of development such as large footprint office or industrial development.	The requirement to demonstrate a flexible design/ layout for LSPBSL, to allow the easily conversion/ retrofit it into a C1 hotel or a residential use, is in line with the London Plan (2021), which seeks to promote a circular economy to reduce waste, carbon footprint and climate change. No proposed modifications
HTA obo Tide Construction (Queens house car park)	Criteria A Part (h) requires proposals to demonstrate a flexible design and layout to allow a LSPBSL scheme to be converted/retrofitted to a hotel (Use Class C1) or self-contained residential uses (Use Class C3), or other town centre uses without the need for demolition and rebuild. This policy replicates Circular Economy Statement requirements and adds an overly prescriptive requirement to Policy HO9 which isn’t justified. Part h should be deleted from the proposed submission version wording to ensure this policy is considered sound and consistent with national and regional guidance.	The requirement to demonstrate a flexible design/ layout for LSPBSL, to allow the easily conversion/ retrofit it into a C1 hotel or a residential use, is in line with the London Plan (2021), which seeks to promote a circular economy to reduce waste, carbon footprint and climate change. No proposed modifications
	Other matters	
HTA obo Tide Construction (Queens house car park)	Part B of the policy that seeks to ensure layout, functional layout of private areas and level/type of communal facilities comply with the LSPBSL LPG should be deleted, as the LPG has now been adopted.	Comment noted. No issue of soundness raised. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	This policy includes additional criterias for LSPBSL schemes, which are unreasonable and is inconsistent with the London Plan Policy H16. It is complex, ineffective and covers matters of other parts of the Plan. It is ineffective, unjustified and will adversely impact the delivery of LSPBSL	Concerns noted. No details on why Policy HO9 is unsound or inconsistent with the London Plan are provided. This policy is considered to be in generally conformity with the Policy H16 of the London Plan (2021), LSPBSL LPG and the NPPF (2023). The Mayor’s representation has raise no concerns in relation to this policy. No proposed modifications

Policy HO10 - Housing with shared facilities (Houses in Multiple Occupation)

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Jonathan Arrowsmith	There is a over-concentration of HMOs on Sussex Road, which has resulted in issues such as anti-social behaviour, crime, rubbish bins and parking. The policy should go further and define overconcentration as being 2 or 3 HMOs within a grouping of 10 properties and consider scenarios where there are HMOs on the other side of the street and include these in the overconcentration definition.	It would be impractical to include HMOs on the opposite side in terms of measuring these relative to the subject property. No proposed modifications
Chandarakar Shah	HMOs do not foster a good living environment, as a transient population are not considerate. It impacts on family or community (.i.e unkept, dirty properties and flytpping). They should not be restricted to the opportunity area and be spread throughout the borough.	Concerns noted. Policy HO10 does not seek to restrict HMO’s proposals to within the Opportunity Area. It seeks to promote HMO’s within the most appropriate locations that have good access to public transport, local; services and facilities (i.e. PTAL 4-6) No proposed modifications
TfL	TfL reiterate previous comments, as no changes were made.	Disagree: London Plan (2021) Policy T6.1 indicates that sui generis residential uses should be car free developments (HMO). Whilst table 10.3 in the supporting text indicates that car free developments should be located within Metropolitan and Major centres and all areas of PTAL 5-

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	'Adequate provision is made for car parking and It is car-free and provides safe access to property and does not result in a harmful cumulative increase in impact on on-street parking (in compliance with policy M2 Parking) or the safety of other road users'.	6 . In contrast, Local Plan Policy HO10 indicates HMO's proposals should be located within an area "within an area that has a PTAL rating of 4-6 with good access to public transport, local services and facilities". It is however proposed to amend the text in light with other modifications for consistency. Proposed modification: The text of Part 11 of the policy should be amended as follows: Adequate provision is made for car parking and Car parking is provided in line policy M2 and provides safe access to property and does not result in a harmful cumulative increase in impact on on-street parking (in compliance with policy M2 Parking) or the safety of other road users'.

Policy HO11 - Self-build and Custom build housing

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	This policy includes a complex criteria for assessing proposals and requires proposals to demonstrate a need. It should ring fence the locations where such housing can come forward. This will limit self /custom build housing coming forward. It is ineffective as it creates uncertainty and is contrary to national policy. It should be redrafted or deleted	The Council do not consider it appropriate for the Plan to include a policy that sets out the locations where self and custom build housing should be delivered. The key reasons are (1) The self-build register indicates a limited level of demand for such plots, possibly due to the scarcity of land, high cost of land and issues with acquiring funding from banks. Such sites have not been submitted via the Local Plan process. No proposed modifications

Policy HO12 – Gypsy & Traveller Provision

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Hertsmere Borough Council	The Watling Farm site is close to the Hertsmere boundary and there are several G & T sites along the A41 corridor. The Plan should be informed by an updated GTANA, based on the revised PPTS G & T definition. If any additional needs arise, new sites should be dispersed across a wider area, considering existing sites close by within Hertfordshire (a).	Policy HO12: G & T accommodations needs, and its supporting text will be updated based on the pitches need identified by the final GLA London Gypsy and Traveller Accommodation Needs Assessment (GTANA) that is expected to be published during Spring 2025. The Council is proposing to accommodate any additional G & T pitch need identified by the GLA GTANA within the existing site allocation at Watlings Farm will include provisions for up to 12 additional pitches within this site. A statement of common ground has been entered into with Hertsmere which acknowledges the current position with respect to the GLA evidence base and the revised PPTS G & T definition. No proposed modifications

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Mayor of London	<p>The Watling Site Farm site is proposed to fully meet the established need to provide 12-13 pitches between 2022-32, based on the ongoing GLA GTANA, as required by Policy H14 of the London Plan (2021).</p> <p>The GLA GTANA is expected to be completed and published by Spring 2025. Depending on the finding of this, the Plan may need to update the level of G & T pitch need and identify further site allocations to find sufficient capacity.</p>	<p>Advise welcomed and comments noted</p> <p>No proposed modifications</p>
Historic England	<p>The plan is proposing to extend existing Gypsy and Travelling site at Watling Farm Close. This is adjacent to Watling Farm that is a Grade II listed building, which means it may result in a change to the significance of its setting.</p> <p>Recommend this is highlighted in the policy and supporting text (as well as site allocation GB2), perhaps at HO12.3.f (because the effect of change via landscaping on heritage significance will also need to be considered) or HO12.3.g (where it could be added to the list of relevant policy designations to be considered)?</p>	<p>Agree that the text to the policy and allocation could be updated as below:</p> <p>Proposed modification</p> <p>Amend part 3f of the Policy HO12 as follows: Add to the end of Part 1: <u>Any expansion will need to be well designed to protect, enhance the significance of nearby Watling Farm GII Listed building and its setting.</u></p>

Strategic Policy 4 – Local Economy

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Standard Response 1	<p>There is still no clear strategy for creating the 1000 jobs. Are there any employers who would be interested in investing here? We have seen many shops close down and new businesses seem to be struggling. Is the Council actively working with any employers to create jobs in the local economy? Does this Plan reflect any actions or plans that employers have asked for to create jobs in the Opportunity Area. Where is the 20 -year job creation strategy in the Plan, similar to that for housing creation? How is this Plan aiming to recover the jobs lost recently in the area at the Council, Debenhams and the conversion of office to accommodation space.</p>	<p>The London Plan (2021) sets out indicative capacity for new homes and jobs (Table 2.1) for opportunity areas, which for Harrow & Wealdstone is 5000 homes and 1000 jobs. Within the remit of the planning legislation, the Harrow Local Plan seeks to ensure that there is sufficient floorspace to cater for quantum of jobs and to create a positive planning policy environment to facilitate its delivery. The Harrow Economic Strategy and other Council strategies and initiatives will contribute to the delivery of the 1000 jobs in the broader sense.</p> <p>No proposed modifications</p>
Hilary & Leslie Coombes	<p>There is still no clear strategy for creating the one thousand jobs associated with the Opportunity Area.</p>	<p>The London Plan (2021) sets out indicative capacity for new homes and jobs (Table 2.1) for opportunity areas, which for Harrow & Wealdstone is 5000 homes and 1000 jobs. Within the remit of the planning legislation, the Harrow Local Plan seeks to ensure that there is sufficient floorspace to cater for quantum of jobs and to create a positive planning policy environment to facilitate its delivery. The Harrow Economic Strategy and other Council strategies and initiatives will contribute to the delivery of the 1000 jobs in the broader sense.</p> <p>No proposed modifications</p>
Hertsmere borough Council	<p>The supporting text to Policy 04 indicates that your Economic Development Needs Assessment (EDNA) (2017) projects a requirement for 6,000 sq m of industrial floorspace. Given the reported significant loss of industrial floorspace reported in Harrow between 2000/1 and 2019/20 (143,000 sq m) and the relative age of the EDNA, pre-dating the Covid pandemic, we are concerned that the projected 6,000 sq m requirement may represent an under-assessment of B2 and particularly B8 land requirements. Hertsmere continues to experience a high level of demand for distribution and warehousing development and we</p>	<p>The Harrow Economic Needs Assessment (2017) was updated by the West London Employment Land Evidence (2019) and West London Employment Land Review (2022).</p> <p>Harrow Local Plan policies prioritises B2/B8 use class within designated industrial sites to ensure such uses are retained, and also supports intensification to meet the 6000sqm of floorspace projected across the plan period.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	would wish to ensure that neighbouring north London boroughs make adequate provision for B2 and B8 requirements during the plan period.	A statement of common ground has been entered into with Hertsmere and acknowledges 'the emerging Local Plan proposes to meet retail and employment floorspace requirements in full'. No proposed modifications
LB Barnet	LB Barnet supports Harrow's spatial strategy to make provision for meeting its full identified housing need (16,040 (net) homes during the Plan period) as detailed in Strategic Policy 03, and sufficient employment floorspace as detailed in Strategic Policy 04.	Noted No proposed modifications
Mayor of London	<p>LBH are promoting strong protection of the borough's Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS) for industrial use, which is welcomed.</p> <p>Paragraph 5.0.6 of the draft Plan establishes a strategic need to deliver 6,000sqm of industrial floorspace over the life of the Plan. This clarity is welcomed and will enable LBH to broadly plan to meet industrial needs. LBH should establish how much of that need is specifically for Class B uses, and then focus on meeting that need, in particular, in designated industrial areas. LBH should focus on those industrial needs which it can control, and which fall outside of Use Class E.</p> <p>The Mayor considers that a proactive approach is required to meet the identified need and LBH should do this by identifying and exploring suitable industrial areas where there is capacity for industrial intensification and promote that through masterplans and/or site allocations. Additionally, LBH should monitor industrial development to ensure that the need is met over the Plan period, especially that need which falls within Class B. Site allocation (OA17- Former Kodak Administration Offices) is located within SIL (0.47ha) and has been identified for co-location with non-industrial uses, specifically residential uses on the upper floors. The site is currently occupied by an office building which has been vacant since 2018. If it is LBH's intention to introduce residential uses at this site, it is suggested that the borough downgrade the designation to LSIS or remove the designation entirely.</p> <p>LBH are proposing to designate three new areas of LSIS and release an existing one, which appears to be entirely occupied by residential uses. This is noted and generally supported.</p>	Noted. Comments in relation to the former Kodak site are addressed under the section dealing with site allocations. No proposed modifications
Leslie Coombes	Does this plan reflect any actions or plans that employers have asked for to create jobs in the opportunity area. Where is the 20-year job creation strategy in the plan, like the details about housing creation? How is this plan aiming to recover the jobs lost recently in the area at the Council, Debenhams, and the conversion of office space and retail space .	The London Plan (2021) sets out indicative capacity for new homes and jobs (Table 2.1) for opportunity areas, which for Harrow & Wealdstone is 5000 homes and 1000 jobs. Within the remit of the planning legislation, the Harrow Local Plan seeks to ensure that there is sufficient floorspace to cater for quantum of jobs and to create a positive planning policy environment to facilitate its delivery. The Harrow Economic Strategy and other Council strategies and initiatives will contribute to the delivery of the 1000 jobs in the broader sense. No proposed modifications
Sunil Kapoor	There is still no clear strategy for creating the 1000 jobs associated with the Opportunity Area. Are there any employers who would be interested in investing here? Is the Council actively working with any employers to create jobs in the local economy. Does this plan reflect any actions or plans that employers have asked for to create jobs in the opportunity	The London Plan (2021) sets out indicative capacity for new homes and jobs (Table 2.1) for opportunity areas, which for Harrow & Wealdstone is 5000 homes and 1000 jobs. Within the remit of the planning legislation, the Harrow Local Plan seeks to ensure that there is sufficient floorspace to cater for quantum of jobs and to create a positive

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	area. Where is the 20-year job creation strategy in the plan, like the details about housing creation? How is this plan aiming to recover the jobs lost recently in the area at the Council, Debenhams and the conversion of office space to accommodation.	planning policy environment to facilitate its delivery. The Harrow Economic Strategy and other Council strategies and initiatives will contribute to the delivery of the 1000 jobs in the broader sense. No proposed modifications

Strategic Policy 5 – Harrow & Wealdstone Opportunity Area

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Standard Response 1	The new Plan retains the sub-areas outlined in the 2013 Plan, each with a designated role. However, the specific role of each sub-area, especially the Station Road Area, has become unclear. The 2013 Plan designated the Station Road sub-area to maintain its low-rise profile, acting as a buffer between the densely populated Harrow and Wealdstone Town Centres, with an aim to improve public spaces and connectivity while preserving its unique character. It was considered unsuitable for high-density development due to the risk of congestion and blending into an enlarged town centre. In contrast, the current Plan permits 18-storey buildings in this congested and polluted area, which is recognised as an air quality management area and was found inappropriate for dense housing in the Council's own Tall Buildings Study. The 2024 Plan's approval of high-density development in Station Road, despite its claim to harmonise with the lower-density suburbs, is clearly incompatible. This may unintentionally result in the amalgamation of Harrow and Wealdstone into a singular town centre, a move not directly stated by the Council. It is suggested that the Council re-evaluate the density levels in line with the Tall Buildings Study and honestly clarify whether they have some underlying plan to merge Harrow Town Centre with Wealdstone Town Centre.	The current Local Plan site allocations were adopted in 2013 and reflected the London Plan housing targets, site specific circumstances (i.e. availability / extant permissions) and evidence base at the time. The housing target for the borough has increased in subsequent versions of the London Plan and sites / capacity need to be identified to reflect these increased targets. The Council considers the Opportunity Area (including Station Road) to be the most sustainable location in the borough to accommodate new development. There is significant need for new housing, and it is appropriate that the most sustainable areas within the borough are fully explored for capacity. It is a sustainable decision to locate growth in an area with substantial public transport infrastructure, employment, and services / community infrastructure. Each of the proposed site allocations have followed guidance set out in the Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023). No proposed modifications
Jean Gray	I am objecting to the congestion and further strain on GP surgeries and other infrastructure in the area which would be brought about by the Tesco Towers development in Station Road.	The Council has prepared an Infrastructure Delivery Plan to identify the infrastructure required to support the level of development identified in the draft Plan; the Council will work with infrastructure providers to support the delivery of that infrastructure. The development at the Tesco site on Station Road is an active Planning Application, and not within the remit of the Local Plan Regulation19 consultation. No proposed modifications
Chandrakar Shah	The Opportunity Area is already facing chaos especially traffic jams due to too many vehicles, combined with too many roadworks. There are also many schools around the area, causing concern about the safety of the children at school drop off and pick up times. There is also a high chance of accidents occurring due to frayed tempers and rage amongst drivers, residents and pedestrian, this does not foster good community cohesion, which is essential for a happy electorate. This area needs some proper regeneration, not new high rise flats. Additionally, we remember being consulted and told that the Station road area would remain low rise and there would be improvements in the local infrastructure and connectivity	The current Local Plan site allocations were adopted in 2013 and reflected the London Plan housing targets, site specific circumstances (i.e. availability / extant permissions) and evidence base at the time. The housing target for the borough has increased in subsequent versions of the London Plan and sites / capacity need to be identified to reflect these increased targets. The Council considers the Opportunity Area to be the most sustainable location in the borough to accommodate new development. There is significant need for new housing, and it is appropriate that the most sustainable areas within the borough are fully explored for capacity. It is a sustainable decision to locate growth in an area with substantial public transport infrastructure, employment, and services / community infrastructure.

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>between the 2 town centres and ease congestion. Has this plan been abandoned? Is it wise to do so?</p>	<p>Each of the proposed site allocations have followed guidance set out in the Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023).</p> <p>The Council has prepared an Infrastructure Delivery Plan to identify the infrastructure required to support the level of development identified in the draft Plan; the Council will work with infrastructure providers to support the delivery of that infrastructure.</p> <p>No proposed modifications</p>
Nimala Shah	<p>The Opportunity Area is now overdeveloped. There should be no more high rise development in this area. We need proper family homes, not flats. Previously, we were told that the Station Road area was to remain low rise. The only reason it was included in the Opportunity Area was for improvement of public areas. Now you want to build high density developments which do not improve connectivity between the 2 town centres and make traffic and congestion worse.</p> <p>Please leave the Station Road Area as low rise as was originally promised.</p>	<p>The current Local Plan site allocations were adopted in 2013 and reflected the London Plan housing targets, site specific circumstances (i.e. availability / extant permissions) and evidence base at the time. The housing target for the borough has increased in subsequent versions of the London Plan and sites / capacity need to be identified to reflect these increased targets.</p> <p>The Council considers the Opportunity Area (including Station Road) to be the most sustainable location in the borough to accommodate new development. There is significant need for new housing, and it is appropriate that the most sustainable areas within the borough are fully explored for capacity. It is a sustainable decision to locate growth in an area with substantial public transport infrastructure, employment, and services / community infrastructure.</p> <p>Each of the proposed site allocations have followed guidance set out in the Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023).</p> <p>Policy HO1 sets out the housing mix for the borough.</p> <p>No proposed modifications</p>
Martin Jent	<p>There needs to be more consideration given to infrastructure. The current track record is very poor. Evidence of this is seen in the Wealdstone Square and access to Wealdstone shops from the Kodak site. Little regard is given to maintaining the area environment after a project is ended.</p>	<p>The Council has prepared an Infrastructure Delivery Plan to identify the infrastructure required to support the level of development identified in the draft Plan; the Council will work with infrastructure providers to support the delivery of that infrastructure.</p> <p>No proposed modifications</p>
Hilary & Leslie Coombes	<p>In the 2013 plan the Station Road area was seen as a low-rise buffer zone between the two town centres of Harrow and Wealdstone. The new plan seems to allow for high buildings which would join the two town centres together. If this is the overall aim, this entrance to Harrow would become even more congested, polluted and dreary.</p>	<p>The current Local Plan site allocations were adopted in 2013 and reflected the London Plan housing targets, site specific circumstances (i.e. availability / extant permissions) and evidence base at the time. The housing target for the borough has increased in subsequent versions of the London Plan and sites / capacity need to be identified to reflect these increased targets.</p> <p>The Council considers the Opportunity Area (including Station Road) to be the most sustainable location in the borough to accommodate new development. There is significant need for new housing, and it is appropriate that the most sustainable areas within the borough are fully explored for capacity. It is a sustainable decision to locate growth in an area with substantial public transport infrastructure, employment, and services / community infrastructure.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>Each of the proposed site allocations have followed guidance set out in the Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023).</p> <p>No proposed modifications</p>
TfL	<p>We welcome the addition of new sections that provide further details of commitments to address safety issues including violence against women and girls.</p>	<p>Noted.</p> <p>No proposed modifications</p>
TfL	<p>We welcome changes to part De and part Df in line with our regulation 18 representation. However, in part De ‘the pedestrian’ should also have been deleted so that it reads as follows:</p> <p>‘Improve the pedestrian walking connectivity and the walking environment throughout the Metropolitan Centre’.</p> <p>We welcome the change to the second sentence of para. 5.0.38 in line with our regulation 18 representation.</p> <p>We also welcome confirmation that ‘The Harrow Town Centre Masterplan will assist in setting out (among other things) how sustainable transport such as walking and cycling will be considered within the Harrow Town Centre and linking to the wider Harrow & Wealdstone Opportunity and beyond.’</p>	<p>Noted and agreed.</p> <p>Proposed Modification</p> <p>Amend Part De as follows: ‘Improve the pedestrian walking connectivity and the walking environment throughout the Metropolitan Centre’</p>
Pat Beazley	<p>Harrow has significantly lower numbers of jobs per resident than surrounding boroughs. There does not seem to be a plan for creating jobs, as most offices have turned into flats. The Council needs to look into options for creating jobs, otherwise they risk missing the 1000 jobs target.</p>	<p>The London Plan (2021) sets out indicative capacity for new homes and jobs (Table 2.1) for opportunity areas, which for Harrow & Wealdstone is 5000 homes and 1000 jobs. Within the remit of the planning legislation, the Harrow Local Plan seeks to ensure that there is sufficient floorspace to cater for quantum of jobs and to create a positive planning policy environment to facilitate its delivery. The Harrow Economic Strategy and other Council strategies and initiatives will contribute to the delivery of the 1000 jobs in the broader sense.</p> <p>No proposed modifications</p>
National Highways	<p>Based upon the types, locations, parking policies and distance from the SRN, plus historic low levels of commuting from Harrow to locations outside of London by car, we are content that further assessment of the transport implications of the Local Plan is not required. The exception is the allocation of 500 homes at the Royal National Orthopaedic Hospital site, located approximately 1km to the southwest of M1 Junction 4. We are content that any impacts from this site can be covered under a future planning application.</p>	<p>Noted.</p> <p>No proposed modifications</p>
Jane Price	<p>Wealdstone as an area of opportunity is a great idea for us, as Wealdstone residents. I’m still, however unconvinced:</p> <p>At the minute I can’t cycle to the station unless I take to the pavement after Grant Rd Wealdstone High St junction. Plans seem to restrict parking opportunities making it difficult for us, (elderly people with childcare responsibilities] to catch a train to London. Wealdstone is filthy and dangerous. At the minute it is rat infested with litter piled up around benches and next to the bins beside the Post Office. There are no longer quality shops. Before we had music, art and toy shops!!</p> <p>The only quality place is the Post Office, threatened with closure.</p>	<p>The Council considers the Opportunity Area to be the most sustainable location in the borough to accommodate new development. There is significant need for new housing, and it is appropriate that the most sustainable areas within the borough are fully explored for capacity. It is a sustainable decision to locate growth in an area with substantial public transport infrastructure, employment, and services / community infrastructure.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>We have just received texts from our GP to apologise for there being no service at Christmas, unless you're an emergency.</p> <p>I am writing as I fail to see Wealdstone as an area of opportunity for local people, perhaps it serves as an opportunity for investors.</p>	<p>The Council has prepared an Infrastructure Delivery Plan to identify the infrastructure required to support the level of development identified in the draft Plan; the Council will work with infrastructure providers to support the delivery of that infrastructure.</p> <p>No proposed modifications</p>
<p>Rolfe Judd obo Tesco Stores Ltd</p>	<p>Draft Strategic Policy 05 splits the Harrow & Wealdstone Opportunity Area into three distinct areas, including Station Road. Part G of the draft policy sets out the requirements for Station Road: <i>G. Development along Station Road linking Wealdstone District Centre and Harrow Metropolitan Town Centre must make a positive contribution to its environment and identity. Proposals should:</i></p> <p><i>a. Be of a massing, bulk, scale and a high-quality design that optimises land, consistent with the sub-areas inclusion within the broader Opportunity Area (being a designated area suitable for substantial change), whilst ensuring a satisfactory relationship with the surrounding suburban character area which is a much lower density;</i></p> <p><i>b. Provide active, viable and serviceable non-residential ground floor frontages; and</i></p> <p><i>c. Contribute to planned improvements to the public realm and road junctions, including the creation of a green boulevard, which improves the environment and active transport linkages between the two centres.</i></p> <p>Tesco support the inclusion of Strategic Policy 05.G and planning application PL/0693/24 includes proposals that fully address the requirements of parts a-c of the policy. As part of the Harrow and Wealdstone Opportunity Area, Station Road is a highly accessible and sustainable location with significant potential to accommodate high quality development which optimises density in accordance with London Plan Policy D3 whilst also repairing the street scene, enhancing the public realm and improving connectivity between Harrow and Wealdstone town centres.</p>	<p>Noted</p> <p>No proposed modifications</p>
<p>Sunil Kapoor</p>	<p>The new plan retains the sub-areas outlined in the 2013 plan, each with a designated role. However, the specific role of each sub-area, especially the Station Road Area, has become unclear. The 2013 plan designated the Station Road sub-area to maintain its low-rise profile, acting as a buffer between the densely populated Harrow and Wealdstone Town Centres, with an aim to improve public spaces and connectivity while preserving its unique character. It was considered unsuitable for high-density development due to the risk of congestion and blending into a single town centre. In contrast, the current plan permits 18-storey buildings in this congested and polluted area, which is recognized as an air quality management area and was found inappropriate for dense housing in the council's tall buildings study. The 2024 Plan's approval of high-density development in Station Road, despite its claim to harmonize with the lower-density suburbs, seems unfeasible. This may unintentionally result in the amalgamation of Harrow and Wealdstone into a singular town centre, a move not directly stated by the council. It is suggested that the council reevaluate the density levels in line with the tall buildings study and clarify whether they plan to merge Harrow Town Centre with Wealdstone Town Centre.</p>	<p>The current Local Plan site allocations were adopted in 2013 and reflected the London Plan housing targets, site specific circumstances (i.e. availability / extant permissions) and evidence base at the time. The housing target for the borough has increased in subsequent versions of the London Plan and sites / capacity need to be identified to reflect these increased targets.</p> <p>The Council considers the Opportunity Area (including Station Road) to be the most sustainable location in the borough to accommodate new development. There is significant need for new housing, and it is appropriate that the most sustainable areas within the borough are fully explored for capacity. It is a sustainable decision to locate growth in an area with substantial public transport infrastructure, employment, and services / community infrastructure.</p> <p>Each of the proposed site allocations have followed guidance set out in the Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023).</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Carter Jonas LLP	<p>Strategic Policy 05 (Harrow & Wealdstone Opportunity Area) sets out that the Council will direct and support development within the Harrow & Wealdstone Opportunity Area, where it assists in the growth and regeneration of the Area, and delivers against the growth potential identified in the London Plan (2021) through the delivery of 5000 new homes and 1000 jobs. Strategic Policy 05 also requires development within the Wealdstone Town Centre to strengthen the vibrancy and vitality of the district centre and improve the environment and identity of Wealdstone as a location for business, industrial activity and family living.</p> <p>The consented proposals for Eastman Village include both housing and employment generating floorspace which will assist the Council in realising the objectives of Strategic Policy 05. The quantum of housing proposed, the mixture of tenures, and the provision of a variety of non-residential uses will ensure that Eastman Village will contribute to the vibrancy of Wealdstone Town Centre whilst respecting and reinforcing the centre’s heritage and character through design and landscaping. The provision of high-quality public realm will assist with reducing the perceived crime and security concerns noted within the supporting text of Strategic Policy 05.</p> <p>In summary, we therefore do not have any additional comments to make to those provided at the Regulation. 18 consultation stage. We therefore continue to strongly agree to the approach set out in the Local Plan.</p>	<p>No proposed modifications</p> <p>Noted</p> <p>No proposed modifications</p>
Places for London	<p>We support the proposed changes to Strategic Policy 05.D.e and paragraph 5.0.38² to prioritise sustainable transport such as walking and cycling in Harrow Town Centre.</p> <p>We generally support the changes to paragraph 5.0.34³ (to confirm that BtR developments can also be acceptable within District Town centres) but consider that an additional amendment is required for reasons of consistency and clarity. The paragraph states that “... <i>the predominant character of the borough is two – three storey in suburban locations and three to four storeys with the town centres and near transport hubs...</i>”. To be consistent with this, we suggest the following additional changes to the paragraph to confirm that BtR development can also be acceptable near transport hubs.</p> <p>Proposals for Built to Rent developments are likely to be acceptable within the boundaries of the Opportunity Area, and the District Town Centres and near transport hubs, subject to compliance with other policies of the Development Plan. These locations provide good access to public transport, local services, facilities and pursuing employment opportunities. This will encourage increased sustainable modes of transport, reduce car use and the risk of increased on-street car parking in the surrounding area. Build to rent schemes accommodate a minimum of 50 units (or more) and require the delivery of a significant quantity of units; to benefit from economies of scale and fund the cost of managing and operating the development. Therefore build to rent schemes on smaller sized sites, particularly outside of the above proposed locations (i.e. suburban areas) would require</p>	<p>The Council’s aims in terms of delivery of build to rent developments is that they will have a beneficial impact on local centres, and this is the preferred location for them. This may not be the case at transport hubs which could draw this investment across the wider London area.</p> <p>No proposed modifications</p>

² Based on the Schedule of Changes. However, there is inconsistency in paragraph numbering - in the Proposed Submission (Regulation 19) version of the Local Plan, this is numbered 5.0.39

³ Based on the Schedule of Changes. However, there is inconsistency in paragraph numbering - in the Proposed Submission (Regulation 19) version of the Local Plan, this is numbered 5.0.35.

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>development to be built at a high density on 4 or more storeys, in order to ensure viability. This would be contrary to the predominate predominant character of the Borough which is two -three storey in suburban locations and three to four storeys with the town centres and near transport hubs, which means locations outside of the Opportunity Area, and District Town Centres and near transport hubs are not likely to be suitable for Build to Rent Developments. Overall, the proposed policy approach will minimise any potential harmful effects on the character areas of the Borough and ensure viability of potential development proposals.</p>	
<p>Greg Dowden / Broadgate Development Partners Ltd</p>	<p>This is the principal location to which all major development and tall buildings in the Borough is to be directed. It is to be expected therefore that the strategic policy sets a detailed framework to guide this development. Policy A should contain a breakdown of the 5000 sign homes in terms of unit mix and size, and supporting a minimum of 1000 jobs is a meaningless target. It should be expressed in terms of new commercial floor space and 1,000 jobs is in any event a very low target to aim for over the plan period.</p> <p>Policy B in its pursuit of comprehensive development will act as a break on perfectly viable commercial schemes which could come forward but which will not be large enough for the LPA to entertain. The LPA therefore will blight sites through waiting indefinitely for large enough sites to come forward capable in their judgement of comprehensive development instead of taking the opportunity presented by smaller sites come forward in their own time as market conditions dictate.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Strategic Policy 05 reflects the indicative capacity for homes and jobs as set out in table 2.1 of the London Plan (2021). These are indicative figures and should be seen as a starting point.</p> <p>Supporting comprehensive development provides a greater opportunity for site optimisation when land is a scarce resource. The policy does not provide a presumption against windfall development or development of a site on its own where this is the most practical or viable option for progressing a site in a timely manner.</p> <p>No proposed modifications</p>
<p>Greg Dowden / Broadgate Development Partners Ltd</p>	<p>Policy C should be deleted as its meaning is unclear. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Strategic Policy 05 (C) acknowledges that not all areas of the Harrow & Wealdstone Opportunity Area are capable of significant development opportunities. SP05(C) sets out that the Opportunity Area cannot be treated as one development opportunity without nuance.</p> <p>No proposed modifications</p>
<p>Greg Dowden / Broadgate Development Partners Ltd</p>	<p>Detailed maps should be provided of the boundaries for the Opportunity Area and for the sub area is within it. As the major location for new development in the Borough it warrants clear identification of its boundaries so applicants can be certain of whether they are within or outside it and therefore which policies apply. At present this is not clear which will make the delivery of the Local Plan objectives uncertain and weak.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>The opportunity area and the designated town centres are set out in policy maps. Station Road links the two town centres.</p> <p>No proposed modifications</p>
<p>Carter Jonas for Barratt London</p>	<p>Strategic Policy 05 (Harrow & Wealdstone Opportunity Area) sets out that the Council will direct and support development within the Harrow & Wealdstone Opportunity Area, where it assists in the growth and regeneration of the Area, and delivers against the growth potential identified in the London Plan (2021) through the delivery of 5000 new homes and 1000 jobs. Strategic Policy 05 also requires development within the Wealdstone Town Centre to</p>	<p>Noted</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>strengthen the vibrancy and vitality of the district centre and improve the environment and identity of Wealdstone as a location for business, industrial activity and family living. The consented proposals for Eastman Village include both housing and employment generating floorspace which will assist the Council in realising the objectives of Strategic Policy 05. The quantum of housing proposed, the mixture of tenures, and the provision of a variety of nonresidential uses will ensure that Eastman Village will contribute to the vibrancy of Wealdstone Town Centre whilst respecting and reinforcing the centre's heritage and character through design and landscaping. The provision of high-quality public realm will assist with reducing the perceived crime and security concerns noted within the supporting text of Strategic Policy 05</p> <p>In summary, we therefore do not have any additional comments to make to those provided at the Regulation. 18 consultation stage. We therefore continue to strongly agree to the approach set out in the Local Plan.</p>	
Historic England	<p>We welcome and support Strategic Policy 05.A.d. which seeks to conserve and enhance the significance of heritage assets. However, including a sentence or two in the supporting text to explain the OAs key heritage sensitivities (the listed and scheduled Headstone Manore complex and Harrow on the Hill Conservation Areas), would be beneficial.</p> <p>For example, at para. 50.36 it could be stated that: <i>'High quality development that introduces appropriate town centre uses and are sizes that are able to contribute to the economy will be supported. As will that which seeks to conserve and enhance the significance of the nearby Harrow on the Hill conservation areas, and the heritage assets associated with it - most notably the G I church of St Mary which, along with other elements of the conservation area, is the focus of several protected views through Harrow.'</i></p>	<p>It is not necessary to add text related to heritage conservation into this policy. It is covered in other policies in the Plan.</p> <p>No proposed modifications</p>
Historic England	<p>Similarly, para 5.0.45 would be a suitable place to add a point about Headstone Manor. For example, <i>'Developments in these locations needs to ensure that design responds to the character. In particular, it needs to respect and integrate with of the area and specifically where new development is sought to be brought forward where the two distinct character areas and respond sensitively to the significance of the nationally important Headstone Manor complex. adjoin, care needs to be taken to ensure both character areas are respected.'</i></p>	<p>It is not necessary to add text related to heritage conservation into this policy. It is covered in other policies in the Plan.</p> <p>No proposed modifications</p>

Policy LE1 – Development Principals & Town Centre Hierarchy

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	<p>Part 8 does not reflect the NPPF or NPPG in its policy objective of directing town Centre uses to town centres.</p> <p>The policy an introduces you concepts of acceptability such as vitality of environment which do not appear in relation to defined town Centre uses in national policy.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted.</p> <p>The policy therefore should be re drafted to reflect this point or deleted</p>	<p>Policy LE1 provides a town centre first approach, whilst recognising that residential uses above town centre uses is an acceptable use and can lead to positive impacts on town centre viability and vibrancy.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	<p>This policy adds nothing to the policy framework for the Opportunity Area. It simply repeats policies which appear elsewhere and are in any event applicable to new development in the in this location. The repetition of planning policies simply causes confusion and uncertainty.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>The policy framework set out for the Opportunity Area (SP05) relates to the opportunity area. Policy LE1 exists to cover all town centres within LB Harrow. Policy SP05 only relates to Harrow Metropolitan Town Centre and Wealdstone District Centre and cannot be applied to centres / neighbourhood parades outside of this area.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Policy is unreasonable because it does not take account of existing sites where residential uses on the ground floor already exist. This policy would make such sites undevelopable unless that ground floor is that use was to be lost. Such loss conflicts with other policies elsewhere in the plan which seek to retain housing where it exists representing an inconsistency between policies which the Council should not have allowed to arise. This will create uncertainty for applicants and will make delivery of the Identified needs uncertain.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Policy LE1 would not sterilise a site as asserted within the representation, rather any development would be considered on its own merit, against the wider development plan, and recommended on planning balance. Policy LE1 sets out that developments with residential use on the ground floor of a town centre or neighbourhood parade would not be supported.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Policy F must define what are essential day-to-day amenities that need to be protected. It is not sufficient to exclude everything except that which is a day-to-day amenity and resist the loss of everything that is not. If the council do not define what that phrase means. As drafted the policy for community facilities is unworkable and uncertain.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Part F provides a sufficient definition as to what is being sought to be protected.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Policy G is inconsistent with and conflicts with national policy set out in the NPPF. This makes clear that where residential town centre uses can meet the sequential test then they will be acceptable in terms of national policy. Despite this this policy as drafted seeks still seeks to resist Schemes that will meet the sequential test. This is unreasonable and conflicts with national policy creating uncertainty for applicants in promoting schemes, and land owners.</p>	<p>The passing of a sequential test does not automatically result in a proposal being considered acceptable. NPPF also requires impact assessments for out of centre retail development, and this requirement is not disengaged where a sequential test has been passed. The policy requirements set out Part G are considered appropriate for uses outside of town centres / less sustainable locations.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	
Greg Dowden / Broadgate Development Partners Ltd	Policy H is the LPA's own version of a sequential test. Accordingly, it is not consistent with national policy set out in the NPPF. No justification is proposed for this sequential test and it will serve to provide continuous uncertainty for the duration of the lifetime of the plan. For instance no floor space in areas subject to B,C or D can be released until there is no vacant floor space outside of designated town centres. The onus will be placed on the applicant on every occasion to demonstrate this which is a burden, as they will have to demonstrate a negative if such a thing is even possible. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	The sequential test set out in Part H takes a town centre first approach, seeking to ensure floorspace in less preferable locations is able to be released prior to that within town centre locations. It is reasonable to protect a main town centre use more robustly than one that is location outside of a town centre, but doesn't not provide a presumption against development. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	In addition it's not clear whether the 12 month marketing period is on top of the local sequential test or in addition to it. It will be exceptionally difficult if both hurdles have to be jumped because vacant floor space continually appears and disappears making it almost impossible to coordinate a period where there is stability in the office market outside of designated town centres to allow a 12 month run at a marketing campaign. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Representation is unclear. If a 12 month marketing campaign is unable to be undertaken due to floorspace continually appearing/disappearing, then it would indicate that the floorspace is not surplus and its release to another use is not required to address a vacancy concern. No proposed modifications

Policy LE2 – Night-Time & Evening Economy

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	We note the addition of explanatory text in para. 5.2.3 'Whilst sustainable modes of transport, including walking and cycling are encouraged, nevertheless some nighttime activities may still rely on vehicles such as the private car and taxi / uber movements. Night-time activities should set out how servicing such as taxi / uber drop offs and pickups are able to be undertaken without harm to neighbouring properties or highway safety.' We welcome the addition of part D although we suggest a minor amendment to emphasise the need for safe night-time travel as follows: 'All new proposed night-time activities must seek to ensure all residents are able to participate in and travel safely to nighttime activities, ensuring a safe environment and in particular for women and girls, along with the LGBTQ+ community.'	Noted and agreed. Proposed modification Amend Part D as follows: 'All new proposed night-time activities must seek to ensure all residents are able to participate in <u>and travel safely to</u> nighttime activities, ensuring a safe environment and in particular for women and girls, along with the LGBTQ+ community'.
Greg Dowden / Broadgate Development Partners Ltd	The policy does not deal with the case of existing lawful and evening economy uses which lie outside Metropolitan town centres and other centres. In addition there are two policy options which is confusing. The first policy E is onerous and unreasonable. It allows for no exceptions at all to any part of the policy. As has been pointed out existing lawful uses that lie outside designated centres would be contrary to this policy but it cannot be the case that any proposal that may ever come forward on any of those sites will be unacceptable. To create a situation where a policy position where this is a possibility is unreasonably restrictive and onerous.	Existing authorised / lawful evening economy uses do not become unlawful by reason of Policy LE2, as they would have existing use rights. Policy LE2 applies to new development. Proposed modification: Amend numbering (Second E to be replaced with F)

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	

Policy LE3 – Industrial Land

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	This policy is self-contradictory and uncertain. Policy AA encourages industrial activities within SIL locations yet policy AB requires new industrial uses to demonstrate an operational compatibility in need. To prevent industrial uses accessing industrial sites on designated sites is counterintuitive and will achieve the opposite of what the London plan policy seeks to achieve. This is a significant contradiction with regional planning policy. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Policy LE3 A(b) provides flexibility for industrial uses across the plan period to come forward that are not set out in London Plan (2021) Policy E4. This provides future proofing to ensure new and emerging uses currently not known may be able to locate in a designated industrial where they are able to demonstrate compatibility. Uses that are not compatible and therefore able to be located elsewhere can be resisted, which will protect the limited industrial floorspace and premises within the borough. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Part C The LPA are not specialist in the field of industrial property and do not have operational or market experience. It is not for them to prevent floor space being subdivided if that is what the market proposes. The LPA not qualified to judge and in addition it is not clear that subdivision of existing industrial floor space even needs planning permission. This policy is confusing and will result in uncertainty and prevent Development coming forward on locations where that development is explicitly promoted and allowed. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	The Local Plan / LPA is required to ensure there is sufficient and suitably sized floorspace and premises for industrial uses, and that appropriate uses are located within industrial sites, in particular SIL and LSIS. Inappropriate subdivision may prejudice this. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Policy AE ignore the situation where there are already existing office uses within a cell location. Such existing uses should be an exception to the policy and should be allowed to expand if that is what is required. Resistance to co location of residential uses in a cell contradicts the approach set out in London plan policy. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Existing office space within industrial locations would benefit from existing use rights. It would not be impacted by Policy LE3. London Plan Policy E7 is clear that co-location within a SIL is not appropriate. Co-location would be acceptable in LSIS subject to LE3B.1. This is in general conformity with the London Plan (2021). No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	It's it Policy BB is unreasonable for you and emerging industrial uses to seek to demonstrate need and compatibility to be allowed on to operate from an existing LSIS. This will serve to reduce jobs an opportunity which is the opposite outcome to that sort by planning policy at national and regional level. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Policy LE3 A(b) provides flexibility for industrial uses across the plan period to come forward that are not set out in London Plan (2021) Policy E4. This provides future proofing to ensure new and emerging uses currently not known may be able to locate in a designated industrial where they are able to demonstrate compatibility. Uses that are not compatible and therefore able to be located elsewhere can be resisted, which will protect the limited industrial floorspace and premises within the borough. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	BC subdivision does not necessarily require having permission at all and the RPA are not suitably qualified to intervene so directly in the commercial property market. This policy was strict otherwise awful development from coming forward and put operators off making applications or occupying property and creating jobs within the borough.	The Local Plan / LPA is required to ensure there is sufficient and suitably sized floorspace and premises for industrial uses, and that appropriate uses are located within industrial sites, in particular SIL and LSIS. Inappropriate subdivision may prejudice this.

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	<p>Feet one collocation is designed to be a flexible response to challenging sites and the difficulties in providing London’s housing need. Only allowing co-location to come forward as part of the local plan is unnecessarily restrictive and will prevent such sites coming forward as windfall sites in the future. The local plan is now and it is for the LPA to introduce sufficient flexibility to allow Such proposals to come forward. To prevent them in an arbitrary way such as this is country to regional planning policy and will prevent the LPA meeting its identified development needs.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Co-location is able to be delivered through the local plan process or through a masterplan approach. This is in conformity with Policy E7 of the London Plan (2021)</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Non-designated industrial land should not be covered by a blanket approach. The existing uses may or may not be appropriate for their context and there may be significant planning benefits to removing industrial uses or vice versa. This blanket approach commits no exceptions and is onerous and restrictive.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>The approach to non-designated industrial land is a response to the evidence base at both a London wide and Harrow level.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Policy prevents existing on industrial uses on designated industrial land from being able to make any change at all. These uses will stagnate, and will not optimise either the number of jobs that buildings can support or achieve the objectives of meeting the identified need. This is unreasonable restrictive approach to Existing uses his presence is an historical fact and bares no relationship to emerging planning policy.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>London Plan Policy E4 is clear that the metric for sufficient industrial supply relates to floorspace and premises to undertake such uses within London, not in relation to employment generation.</p> <p>No proposed modifications</p>
Home Builders Federation	<p>Elements of the policy are unsound because they are unjustified.</p> <p>We appreciate the need to safeguard industrial land. Nevertheless, the Council could be more supportive of the intensification of industrial land for residential so long as this is done in a planned way, with proper regard for design and agent of change principles.</p>	<p>Noted. Policy allows for co-location with residential in LSIS. The approach set out in the policy is considered to be in general conformity with the London Plan and the representation has not provided an explanation as to why they consider the policy to be unsound nor why the policy should seek to depart from the approach set out in the London Plan.</p> <p>No proposed modifications</p>
Home Builders Federation	<p>A.1 states that colocation of industrial and residential on strategic industrial land will not be supported. Although it is unlikely that residential and industrial uses can co-exist satisfactorily, instead, we recommend that the Council allows for the possibility that this might happen if very well planned. The policy should be amended to read: “Co-location of residential within a SIL will generally be resisted, but the Council will consider exceptional schemes and designs that do not in any way compromise the industrial performance.”</p>	<p>Proposed approach would not be in conformity with Londo Plan (2021) Policy E7B.</p> <p>No proposed modifications</p>
Home Builders Federation	Part B.1 states:	Noted

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p><i>B.1 Co-location of residential within a LSIS will only be supported where these have been progressed through the Local Plan process or have a Masterplan agreed with the Local Planning Authority.</i></p> <p>We generally support this approach, but it begs the question whether the Council has identified any LSIS land which could integrate industrial and residential uses.</p>	No proposed modifications

Policy LE4 – Culture & Creative Industries

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Theatres Trust	We continue to welcome this policy, which provides strong protection against the loss of valued cultural facilities including theatres, conforming with paragraph 98 of the NPPF (2024) and London Plan policy. It also effectively facilitates the possibility of new facilities.	Noted. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	No criteria are given in policy LE4A which will not allow consistency of application. This will create uncertainty for applicants and prevent schemes coming forward. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Policy LE4A a – e provide criteria. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Part B is unreasonable as it only allows expansion of cultural and creative facilities where there is a demonstrable need. The LPA are not in a position to assess that need. It is for operators and owners to take the risk and for the LPA simply to control the external effects of such increases in floor space. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	The LPA seeks to encourage and support types of use that there is an evidenced need for within the evidence base that underpins the Local Plan, or where an applicant is able to demonstrate need. The LPA also seeks to ensure that such uses would be delivered in appropriate locations. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Part 4B should be deleted as it adds nothing to enable assessment for applications and simply clocks up the local plan with an and unnecessarily repetitive policy. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	The LPA consider that the criteria set out under LE4B are material planning considerations when determining planning applications for a range of cultural facilities. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Part C there is a significant inconsistency in the LPA's approach to creative and cultural facilities when compared to other uses. With other uses a 24 month marketing period is required but here what needs to happen is that alternative cultural or creative industry uses are considered. Criterion C this approach is unreasonably owners and inflexible and will prevent the free operating and efficient operating of the property market to allow Land of buildings to be recycled quickly and efficiently into alternative uses. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	It is considered that not explicitly requiring marketing within this policy is in generally conformity with Policy HC5 Supporting London's culture and creative industries of the London Plan, which also does not require marketing (but does for other uses). The draft policy sets out a mechanism to release such uses where appropriately evidenced. No proposed modifications

Policy LE5 – Tourism & Visitor Accommodation

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Savills obo Whitbread	<p>C. The Council will resist the loss of tourist infrastructure. Any loss of tourism infrastructure will only be supported where:</p> <p>a. There is no longer a need for that facility; or</p> <p>b. The redevelopment of the site would deliver result in an over-riding public benefits which over-ride those currently provided by the existing uses; and</p> <p>c. Any change in use or redevelopment complies with other policy requirements of the development plan, or</p> <p>d. The loss of such is offset through a reprovion either on site or elsewhere in the Borough;</p> <p>Supporting Text: <i>The London Plan (2021) estimates that an additional 58,000 bedrooms of serviced accommodation will be needed in London by 2041, and also set out a requirement for Harrow to deliver 347 rooms. The Harrow Economic Needs Study (2024) noted the impact of the Coronavirus pandemic, and forecasts that 270 additional rooms could be required to be provided within Harrow from 2023 – 2041. The Council will look to meet the demand as set out above through supporting appropriate new and retaining existing hotel / tourist accommodation in appropriate locations unless the loss of a hotel is to be replaced elsewhere within the borough as part of a wider consolidation and enhancement strategy</i></p>	<p>The Council is seeking to take a positive approach to provision of hotel accommodation in the borough, in line with regional and local evidence. It is however acknowledged that operators of hotels may have an active programme to enhance the quality of their hotels / rooms within the borough, which may include better locations and / or better-quality buildings (i.e. environmental performance, contemporary provision) and therefore represent an overall positive outcome even if not a numerical increase in room numbers. The addition of paragraph Cd to the policy would reflect such a circumstance.</p> <p>It is also acknowledged that paragraph 5.5.2 could be simplified with respect to references to evidence base and added to to reflect the change to paragraph C.</p> <p>Proposed modifications</p> <p>Amend Policy LE5, paragraph C as follows:</p> <p>c. Any change in use or redevelopment complies with other policy requirements of the development plan; and</p> <p>d. There would be no net loss from the borough stocks over the plan period through reprovion on site or elsewhere within the borough.</p> <p>Amend paragraph 5.5.2 as follows:</p> <p>5.5.2 As an outer London borough, Harrow’s tourism economy is still an integral part of the local and wider economy. A strong tourism economy provides opportunities for local residents through jobs and supports local businesses across the borough. The London Plan (2021) estimates that an additional 58,000 bedrooms of serviced accommodation will be needed in London by 2041 and also set out a requirement for Harrow to deliver 347 rooms. The Harrow Economic Needs Study (2024) noted the impact of the Coronavirus pandemic, and forecasts that 270 <u>additional</u> rooms to be provided within Harrow from 2023 – 2041. The Council will look to meet the demand as set out above <u>over the plan period</u> through supporting appropriate new and retaining existing hotel / tourist accommodation in appropriate locations <u>unless the loss of a hotel is to be or has been replaced elsewhere within the borough which maybe secured through a legal agreement.</u></p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Tourism and visitor accommodation should also be directed to suitable sites which lie outside of existing centres but which provide existing tourism and visitor facilities.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>New tourism and visitor accommodation is a main town centre use as set out in the NPPF, which are also generally the most sustainable locations. Policy LE5 seeks to direct new development to such locations. Existing infrastructure outside of these locations would have existing use rights, and Policy LE5 does not provide a resumption against extensions to or intensification of existing infrastructure.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	Policy C is unnecessarily repetitive and pointless. It should be deleted. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Representation provides no reasoning for deletion, nor is it considered repetitive. London Plan 2021 and Harrow Economic Needs Study sets out a need for tourist infrastructure across London and Harrow. Policy LE4C provides protection for such uses but a mechanism to release from their use where appropriate. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Policy should be deleted. This is the first mention of the circular economy and it is not clear what it is about tourism and visitor accommodation. That means this sector must specifically address this matter it is . The circular economy is the subject of specific policies elsewhere chapter 9 of the in the emerging plan and it is confusing for them to be introduced here out of context. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	LE5E seeks to ensure the re-use of buildings where their adaption can be undertaken to other appropriate uses whereby avoiding demolition and rebuild. No proposed modifications

Strategic Policy 6 – Social & Community Infrastructure

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Dharmesh Patel	Supports the policy	Support noted No proposed modifications
Standard Response 1	The details regarding infrastructure remain obscure. There is no dedicated funding, and there's a reliance on incentivised contributions from developers, which are not even assured as developers often wrangle out of them after permissions have already been granted. The development strategy near Harrow and Wealdstone transport hubs appears to presume that people will utilise the transport to commute to and from Harrow, yet it provides no attractions for residents within Harrow itself. Both Harrow Leisure Centre and Hatch End swimming pool are nearing the end of their functional lifespan and need to be replaced, but there is no funded Plan in place for their replacement or renovation, nor have any potential new sites been suggested/identified. A number of important issues surrounding healthcare have been identified, but no meaningful solutions have been proposed. There is a capacity shortfall in GPs, with no current strategy to address this, despite the rising population. The Primary Care Strategy for Harrow (Harrow CCG 2018/19 – 2022/23) recognised that the borough has experienced a surge in demand due to an aging population and significant growth that will increase the borough's population by 20,000 people over the next eight years. The 2022-2030 Harrow Health and Wellbeing Strategy emphasises the specific needs of people living in poverty, noting that "people in our poorest neighbourhoods die more than four years earlier than those in the wealthiest parts of Harrow." This is an additional area of concern due to the lack of GP capacity in these areas. Data analysis has shown that deprivation levels in the borough range from low to very high, with an average deprivation score of 15.03, compared to the England average of 21.67. The strategy outlines specific challenges related to health inequalities, obesity, mental health, and social isolation in Harrow. The existing health infrastructure cannot support new housing developments without securing additional medical care facilities. While engagement	The plan contains policies that encourage the provision of new leisure facilities and healthy town to meet the needs of residents The policy seeks to protect existing community uses and ensure that sufficient community infrastructure is delivered to meet the needs arising from new development. This overarching policy reflects the findings of the IDP. This is a 'live' document that will continue to be updated over the course of the plan period, as detailed infrastructure cost information becomes available. The Council will continue to work with infrastructure providers to facilitate the delivery of infrastructure within the borough. No proposed modifications

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	<p>between the ICB and the Council continues to ensure new provisions on regeneration and new development sites, investment in expanding existing primary and secondary care is also crucial. In consultation with the Head of Public Health in Harrow, a clear evidence base for healthcare provision was identified, but there are service provision gaps, particularly in the central area of the borough, including within the Opportunity Area. There is a high risk that further development in this area will exacerbate pressure on GPs as the population grows and ages.</p> <p>The Local Economic Needs Assessment forecasts a shortfall in water supply and suggests demand-side measures such as retro-fitting, water metering and stricter building regulations. With no apparent strategy to tackle the water scarcity, residents are just expected to adjust their consumption accordingly.</p> <p>The Local Economic Assessment's electricity report indicates that the electricity grid is facing considerable strain from high-density development and redevelopment. Already, residents in the vicinity of the Opportunity Area have been subject to numerous unplanned power outages and drops in internet services. In 2024, there have already been at least five such incidents. The increasing population is likely to intensify these issues. Currently, there is no documented strategy to address this problem.</p> <p>According to the Council's data (New Harrow Local Plan - Infrastructure Delivery Plan, page 7), the population will decrease in every ward except for those within the Opportunity area, which will see an increase over the next five years as follows: Marlborough by 7,847; Greenhill by 2,777; Headstone South by 962; Harrow on the Hill by 166, totalling 11,752 in five years, and up to 21,000 in 15 years. Given this scenario, it raises the question of why development would be concentrated in the Opportunity Area when it is already the most densely populated, and struggling to meet the infrastructure demands of its current residents. It actually makes no logical sense, and lays ground for future problems</p> <p>The New Harrow Local Plan - Infrastructure Delivery Plan generally indicates that funding for projects has not been sourced. Refer to the table: Harrow New Local Plan 2021-2041 - Infrastructure Delivery Plan (IDP) - Appendix 1 Infrastructure Schedule (as of 28 October 2024). This implies that the issue of infrastructure remains unresolved.</p> <p>Residents have been demanding adequate infrastructure to meet present and future needs, but this seems to be falling upon deaf ears.</p>	
Zahir Abdulla	<p>Harrow's ambitious development plans are overshadowed by significant infrastructure challenges. Key concerns include:</p> <p>Housing and Transport: The proposed development strategy prioritizes housing near transport hubs without sufficient local amenities. This approach neglects the needs of residents within Harrow itself.</p> <p>Leisure Facilities: Essential facilities like Harrow Leisure Centre and Hatch End swimming pool are nearing the end of their lifespan, yet there's no concrete plan for their replacement.</p> <p>Healthcare Crisis: The borough faces a severe GP shortage, exacerbated by an aging population and rapid growth. The Primary Care Strategy and the Health and Wellbeing Strategy highlight significant health inequalities and the need for urgent investment in primary and secondary care.</p>	<p>The plan contains policies that encourage the provision of new leisure facilities and healthy town to meet the needs of residents</p> <p>The policy seeks to protect existing community uses and ensure that sufficient community infrastructure is delivered to meet the needs arising from new development.</p> <p>This overarching policy reflects the findings of the IDP. This is a 'live' document that will continue to be updated over the course of the plan period, as detailed infrastructure cost information becomes available. The Council will continue to work with infrastructure providers to facilitate the delivery of infrastructure within the borough.</p>

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	<p>Water and Energy Shortages: The Local Economic Needs Assessment warns of potential water scarcity and electricity grid strain due to increased demand from new developments.</p> <p>Population Imbalance: The New Harrow Local Plan identifies a significant population increase in the already densely populated Opportunity Area, raising concerns about the capacity of existing infrastructure to cope.</p> <p>Funding Uncertainty: The Infrastructure Delivery Plan reveals a lack of secured funding for many critical projects, leaving the future of Harrow's infrastructure uncertain.</p> <p>Residents demand a comprehensive plan to address these pressing issues and ensure that future development is sustainable and beneficial to the community.</p>	<p>No proposed modifications</p>
<p>HARROW CIVIC RESIDENTS ASSOC.</p>	<p>The Local Plan provides little or no information on how the health needs of the increased population in the Opportunity Area will be met, this is of concern to the HARROW CIVIC RESIDENTS ASSOC. speaking on behalf of residents who have faced challenges accessing basic services.</p>	<p>The Local Plan contains policies to restrict the loss of essential infrastructure. The IDP identifies the expected need for health facilities over the plan period. This is a live document that will be updated as further information on these needs comes forward.</p> <p>No proposed modifications</p>
<p>Harrow Muslim Council</p>	<p>It is great that the policy makes note of the need to expand burial grounds in clause 6.1.7. Further to meetings I have had with Cllr Ashton and the planning department, it would be great to get further information on what land has been allocated to be used for Muslim burials and what the process will be to make this a reality. As discussed there is a big need for this in Harrow, as I understand we have now run out of burial space.</p>	<p>This matter is addressed in para. 6.1.7 of the plan.</p> <p>A Statement of Common Ground has been entered into with Brent and Ealing with respect to joint working to consider this matter at a sub-regional level.</p> <p>Harrow will participate in the forthcoming London-wide Audit of London Burial Space Provision being undertaken by the Mayor of London to inform the forthcoming new London Plan. The audit is planned to be undertaken during Autumn 2025. It is understood from the GLA that the project will update the last audit and, at present, no significant divergence from the existing methodology is planned. Overarching aims will be to: determine existing and future supply and demand for space on a per borough basis; summarise capacities; and provide recommendations to address shortages. Once completed, it will form part of the evidence base for Borough-wide work on burial space and for each Borough's development plan</p> <p>No proposed modifications</p>
<p>Chandarakar Shah</p>	<p>Currently, the A and E department's waiting times have increased dramatically, leading to residents waiting hours for urgent/emergency treatment.</p> <p>Appointment waiting times for GPs have increased. We have waited weeks for appointments. Polyclinics no longer accommodate walk ins and offer specialised rather than general treatments. This has led to a strained and inadequate medical facilities, even for the current population level.</p> <p>We have experienced unusually high number of power cuts, which have been attributed directly to the building of new flats without first securing sufficient capacity. As a vulnerable senior, I have received emails from UK power networks to register with them for priority services at times of powercuts. This is clear evidence that the network is not sufficient to meet current needs and will only get worse if you new flats are developed without addressing the capacity need.</p> <p>Your documentation has identified problems in capacity, but hasn't suggested funded</p>	<p>Comments noted. Infrastructure needs are identified in the IDP – these include healthcare and electricity generation. The IDP is a living document and will continue to be updated throughout the lifetime of the plan.</p> <p>Health needs are identified in the IDP</p> <p>Infrastructure delivery is also dependent on a range of other parties, including the providers. The Council will continue to work with infrastructure providers to facilitate the infrastructure required to support the level of development envisaged in the Local Plan.</p> <p>Parking is covered by other policies in the plan.</p> <p>No proposed modifications</p>

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	<p>solution. This is very worrying!</p> <p>Parking has become a major issue, especially near the Kodak Centre development (Eastman Village). The new residents have moved into accommodation with no parking spaces, but still insist on parking in neighbouring roads.</p>	
Nimala Shah	<p>There are major concerns about health and social care facilities which have been found to be inadequate for the current population, let alone thousands of new residents. GPs, Hospitals, clinics are already oversubscribed. Appointment are difficult to secure. Your report on the infrastructure identifies problems with no real solution or funding.</p> <p>There are issues with electricity and water supply, which also do not have proper solutions</p> <p>Please secure proper infrastructure before building any more flats.</p>	<p>Comments noted.</p> <p>The policy seeks to ensure that new development adequately meets infrastructure needs. Infrastructure delivery is also dependent on a range of other parties, including the providers. The Council will continue to work with infrastructure providers to facilitate the infrastructure required to support the level of development envisaged in the Local Plan.</p> <p>No proposed modifications</p>
Hilary & Leslie Coombes	<p>There is little information about infrastructure and no dedicated funding. More people in the Opportunity Area will mean greater demand for healthcare provision, services such as water, electricity, schools and leisure facilities yet there is no documented strategy for any of this. With such a densely populated area already, without proper planning the outlook for the area appears bleak.</p>	<p>Comments noted. The IDP is a living document that will continue to be updated with information on infrastructure delivery and funding as this emerges over the plan period.</p> <p>No proposed modifications</p>
Pat Beazley	<p>Schools, medical facilities, sports and recreation facilities are mentioned, but no firm numbers, locations or requirements have been provided.</p> <p>There is no ring fenced funding for infrastructure. The plan relies on CIL payments, which the council does not always collect. For example, the council are now unable to collect 1.4million from the Safari development.</p> <p>The previous plan had schools and doctor's surgeries located at the Kodak site. These are yet to be built and the site is nearly at capacity. Is there enough space left at the Kodak site to accommodate these? Is there going to be a school at the Civic Centre site?</p> <p>The council need to pursue funding for infrastructure and not rely on developers who will in most cases try to back out</p>	<p>Comments noted. The IDP is a living document that identifies needs and will continue to be updated with information on infrastructure delivery and funding.</p> <p>Infrastructure delivery is also dependent on a range of other parties, including the providers. The Council will continue to work with infrastructure providers to facilitate the infrastructure required to support the level of development envisaged in the Local Plan.</p> <p>No proposed modifications</p>
Leslie Coombes	<p>The details regarding infrastructure remain insufficient. There is no dedicated funding, and there is a reliance on contributions from developers, which are not assured as developers often manage to avoid them. five years, and up to 21,000 in 15 years. The question is also why development would be concentrated in the Opportunity Area when it is already the most densely populated and struggling to meet the infrastructure demands of its current residents.</p> <p>The New Harrow Local Plan - Infrastructure Delivery Plan indicates that funding for projects has not been sourced. Refer to the table: Harrow New Local Plan 2021-2041 - Infrastructure Delivery Plan (IDP) - Appendix 1 Infrastructure Schedule (as of 28 October 2024). This implies that the issue of infrastructure remains unresolved.</p>	<p>Comments noted. The IDP is a living document that identifies needs and will continue to be updated with information on infrastructure delivery and funding.</p> <p>Infrastructure delivery is also dependent on a range of other parties, including the providers.</p> <p>No proposed modifications</p>
Nexus Planning obo Taylor Wimpey	<p>No modifications are required to Strategic Policy 06 itself. However, to deliver the requirements of the policy and the relevant Strategic Objective with respect to social and physical infrastructure in compliance with the paragraph 20, 97 and 99 of the December 2023 version of the Framework, the spatial strategy must be amended to allocate sites that are capable of delivering required infrastructure facilities to serve the increased population</p>	<p>Comments noted. The Council is not proposing to release Green Belt land for development as it is considered the development and infrastructure needs can be met within the urban area of the borough / brownfield sites.</p> <p>No proposed modification</p>

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	<p>growth without exacerbating the pressure on already overstretched facilities in the Harrow and Wealdstone Opportunity Area. This will require a consideration of sites currently located within the Green Belt.</p>	
Sunil Kapoor	<p>The details regarding infrastructure remain insufficient. There is no dedicated funding, and there's a reliance on contributions from developers, which are not assured as developers often manage to avoid them. The development strategy of building homes near Harrow and Wealdstone transport hubs appears to presume that people will utilise the transport hubs to commute to and from Harrow, yet it provides no attractions for residents within Harrow itself. Both Harrow Leisure Centre and Hatch End swimming pool are nearing the end of their functional lifespan and need to be replaced, but there is no funded plan in place for their replacement, nor have any potential new sites been pinpointed.</p> <p>Several concerning issues surrounding healthcare have been identified, and no meaningful solutions have been proposed. There is a capacity shortfall for GPs, and there is no current strategy to address this shortfall, especially considering the rising population. The Primary Care Strategy for Harrow (Harrow CCG 2018/19 – 2022/23) recognised that the borough has experienced a surge in demand due to an aging population and significant growth that will increase the borough's population by 20,000 people over the next eight years. The 2022-2030 Harrow Health and Wellbeing Strategy emphasizes the specific needs of people living in poverty, noting that "people in our poorest neighbourhoods die more than four years earlier than those in the wealthiest parts of Harrow." This is an additional area of concern due to the lack of GP capacity in these areas. Data analysis has shown that deprivation levels in the borough range from low to very high, with an average deprivation score of 15.03, compared to the England average of 21.67. The strategy outlines specific challenges related to health inequalities, obesity, mental health, and social isolation in Harrow. The existing health infrastructure cannot support new housing developments without securing appropriate mitigation measures. While engagement between the ICB and the council continues to ensure new provisions on regeneration and new development sites, investment in expanding existing primary and secondary care is also crucial. In consultation with the Head of Public Health in Harrow, a clear evidence base for healthcare provision was identified, but there are service provision gaps, particularly in the central area of the borough, including within the Opportunity Area. There is a risk that further development in this area will exacerbate pressure on GPs as the population grows and ages.</p> <p>The Local Economic Needs Assessment forecasts a shortfall in water supply and suggests demand-side measures such as retrofitting, water metering, and stricter building regulations. With no apparent strategy to tackle the water scarcity, residents are expected to adjust their consumption accordingly.</p> <p>The Local Economic Assessment's electricity report indicates that the electricity grid is facing considerable strain from high-density development and redevelopment. Consequently, residents in the vicinity of the Opportunity Area have been subject to numerous unplanned power outages. In 2024, there have already been at least five such incidents. The increasing population is likely to intensify these issues. Currently, there is no documented strategy to address this shortfall.</p> <p>According to the council's data (New Harrow Local Plan - Infrastructure Delivery Plan, page 7), the population will decrease in every ward except for those within the opportunity area, which will see an increase over the next five years as follows: Marlborough will increase by 7,847;</p>	<p>The plan contains policies that encourage the provision of new leisure facilities and healthy town to meet the needs of residents.</p> <p>The policy seeks to protect existing community uses and ensure that sufficient community infrastructure is delivered to meet the needs arising from new development.</p> <p>This overarching policy reflects the findings of the IDP. This is a 'live' document that will continue to be updated over the course of the plan period, as detailed infrastructure cost information becomes available. The Council will continue to work with infrastructure providers to facilitate the infrastructure required to support the level of development envisaged in the Local Plan.</p> <p>No proposed modifications</p>

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	Greenhill will increase by 2,777; Headstone South will increase by 962; Harrow on the Hill will increase by 166, totalling 11,752 in five years, and up to 21,000 in 15 years. Given this data, it raises the question of why development would be concentrated in the Opportunity Area when it is already the most densely populated and struggling to meet the infrastructure d	
Carter Jonas LLP	<p>Strategic Policy 06 (Social and Community Infrastructure) sets out that development must contribute to the protection, enhancement and additional provision of; community services and facilities; physical, social, green and blue infrastructure, to adequately address the Borough's existing and future needs.</p> <p>The Eastman Village development includes public realm and landscape proposals with a rich and distinctive network of routes, streets and other public spaces, including the provision of areas for formal / informal play. CIL and S106 contributions have been used to fund other community infrastructure facilities and will continue do so as further phases of the development come forward. The importance of such facilities cannot be understated, and it is through the continued development of sites such as Eastman Village that the objectives of the policies set out in Chapter 06 will be realised.</p> <p>In summary, we therefore do not have any additional comments to make to those provided at the Regulation 18 consultation stage. We therefore continue to strongly agree to the approach set out in the Local Plan.</p>	<p>Comments noted</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	Policy 06 A only requires a contribution to be made to social community infrastructure. No measurement or definition is given of what a contribution should be and therefore the policy is meaningless. In addition it's most unlikely that a proposal will be able to protect, enhance and provide additional infrastructure all at the same time yet this is what the policy requires. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted	<p>Part A of the policy notes that development should contribute to physical, social and green infrastructure as well as community infrastructure. This is a high level policy that sets a framework for subsequent policies in the Plan.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Policy AA will add a further degree of difficulty by only allowing new development to come forward if it can be coordinated with provision of physical and social infrastructure. In addition the definition of appropriate is not included making this policy uncertain and difficult to meet.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Infrastructure delivered should be phased to support housing growth; such an approach is supported by the NPPF.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	Policy AB seems to repeat policy AA with the same flaws and defects. It is repetitive and confusing. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	<p>No repetition, although wording could be more concise.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Parts A to E the best judges of where physical or social infrastructure is needed are the owners and operators of such infrastructure. If owners or operators wish to bring forward schemes then they should be free to do so and not have to demonstrate need to the LPA who then the events are ill placed to assess such need.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Policy seeks to ensure sufficient infrastructure comes forward for planned growth. This does not restrict planned delivery from infrastructure providers.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	Policy AE afford development is to contribute to the delivery of strategic infrastructure, then there is no need for coordination and phasing or demonstrating adequate capacity as required by policies AA and AB. This inconsistency in the policy approach within a single policy will make it under the owners and will require applicants to make potentially multiple Unnecessary contributions to community infrastructure. The objective of policy AE is in any event achieved by policy AF which is a further reason why policy should be deleted.	It is acknowledged that this criterion is arguably too broad and that not all development in the borough will be required to contribute to strategic infrastructure and criterion could be deleted. Suggested modification: Amend SP06 as follows: d. Resisting the loss of community facilities unless adequate arrangements are in place for their replacement or the enhancement of other existing facilities contributing to an overall improvement in local provision; and e. Requiring all development to contribute to the delivery of strategic infrastructure identified in the Infrastructure Delivery Plan; and f. e. Utilising the Community Infrastructure Levy (CIL) or any subsequent mechanisms to fund the maintenance and provision of infrastructure through legal agreements.
Greg Dowden / Broadgate Development Partners Ltd	Part F this policy does not make it clear that the provision of infrastructure should only be done so where it is reasonable to do so and compliant with the relevant cell regulations and other legislation.	Part f relates to spending of CIL funds rather than the collection of CIL. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	It is considered that the points raised in the representation can be addressed (if necessary) and the draft policy is sound. No proposed modifications
Carter Jonas for Barratt London	Strategic Policy 06 (Social and Community Infrastructure) sets out that development must contribute to the protection, enhancement and additional provision of; community services and facilities; physical, social, green and blue infrastructure, to adequately address the Borough's existing and future needs. The Eastman Village development includes public realm and landscape proposals with a rich and distinctive network of routes, streets and other public spaces, including the provision of areas for formal / informal play. CIL and S106 contributions have been used to fund other community infrastructure facilities and will continue do so as further phases of the development come forward. The importance of such facilities cannot be understated, and it is through the continued development of sites such as Eastman Village that the objectives of the policies set out in Chapter 06 will be realised. In summary, we therefore do not have any additional comments to make to those provided at the Regulation 18 consultation stage. We therefore continue to strongly agree to the approach set out in the Local Plan. In summary, we therefore do not have any additional comments to make to those provided at the Regulation 18 consultation stage. We therefore continue to strongly agree to the approach set out in the Local Plan.	Comments noted. No proposed modifications

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Home Builders Federation	<p>Part A a is unsound as it is ineffective.</p> <p>Part A a requires that new development and growth is co-ordinated and phased in tandem with the provision of appropriate physical and social infrastructure.</p> <p>It is not quite clear what is being proposed here, but it does suggest that a development granted planning permission, may be forced to build-out to a timetable set by the providers of physical and social infrastructure. While this would be desirable, and possibly essential in terms of some types of infrastructure, it does also mean that the housebuilder with planning permission may be dependent on the delivery of infrastructure by a third party and to a timetable over which it has no control.</p> <p>This is too restrictive. It could become an impediment to delivery. We recommend instead that this part of the policy should be changed to read that it may be necessary, in some instances, such as major strategic schemes, to coordinating the pace of housebuilding with the provision of critical infrastructure.</p>	<p>Policy requires new development to be supported by infrastructure that underpins planned growth. This is essential to ensure sustainable development and is consistent with the NPPF and in general conformity with the London Plan.</p> <p>No proposed modifications</p>
Home Builders Federation	<p>Part B is unsound because it is contrary to national policy.</p> <p>Part B requires proposals for new development to demonstrate adequate infrastructure capacity exists, or will be provided on and off site, to serve the development.</p> <p>It is for the Council, through the preparation of its local plan, to be confident that the infrastructure exists, or will exist, to enable the plan to be delivered. If this is in doubt, then the plan is unsound.</p> <p>While applicants will be responsible for the delivery of certain items of infrastructure, such as things provided for on-site via S106, they are not responsible for the delivery of critical strategic infrastructure like the supply of water services and electricity. Housebuilders cannot plan for or remedy these things.</p> <p>This policy will act as an impediment to delivery.</p> <p>If the Council doubts that the necessary infrastructure will be available to enable the aims of its plan to be delivered, then this must be clarified now. Otherwise, the plan is unsound because it is undeliverable.</p>	<p>Part B relates to proposals for new development, for which applicants are responsible. Representation notes that applicants will be responsible for certain items of infrastructure. As such, part (b) is sound.</p> <p>No proposed modifications</p>

Policy CI1 - Safeguarding and Securing Social Infrastructure

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Sport England	<p>Sport England highlighted in its comments to the Regulation 18 submission that it did not consider Policy CI1 to be sound in relation to sport and recreation facilities for the following reason(s):</p> <p><i>“...Sport England would object to the wording of other elements of Policy CI1. In regard to Policy CI1 C. a, evidence of effective marketing does not mean that a sports facility or site is not needed nor does this meet the requirements of both the NPPF, paragraph 103, and Sport England policy, which require a site to be fully assessed as surplus to current and future sporting need. As highlighted above, the Councils Indoor and Outdoor Sports Facilities Strategy should identify any sites that are surplus. It would also appear, as currently drafted, Policy CI1 is in conflict with Policy CI3 in this respect. As a result, Sport England recommends that Policy CI1 C. a. is reworded to clearly indicate that a robust assessment must be undertaken that identifies a site as surplus to current and future sport need when a loss to a community sports facility is proposed.</i></p>	<p>Paragraph 6.1.1 indicates that ‘Sport and Recreation infrastructure requirements are dealt with explicitly in Policy CI3’; consequently, there is no conflict between CI1 and CI3. It is noted that Sport England considers Policy CI3 as being sound, apart from a cross-reference to Policy CI1 in relation to locational considerations (addressed below).</p> <p>No proposed modifications</p>
Sport England	<p>Policy CI1 C. c & d. indicate that a replacement facility should be provided that would better meet the specific needs of existing and future users in regard to quantity, quality and location or the</p>	<p>CI1 is a general policy relating to social infrastructure provision. CI3 will be the primary policy relating to these facilities. Para 6.1.1 directs the reader to this.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>redevelopment would secure enhanced social infrastructure re-provision (on or off-site) ensuring continued delivery of social infrastructure and related services. Although Sport England welcome the spirit of these element of Policy CI1, it does not fully align with the NPPF, paragraph 103. In relation to sport, the replacement should be at least quality, quantity and in a suitable location as well as meeting specific a need which is slightly different to current wording of the Policy CIL C. c & d. It is recognised that in most situations the difference in the requirements is unlikely to cause any unintended consequences but there could be occasions where there is net loss of provision or floorspace that could be detrimental to sport. Sport England, therefore, recommend that this element of Policy CI1 are reconsidered, especially in relation to d.”</p> <p>The above appeared to be addressed in Paragraph 6.1.1 of the Regulation 19 submission version where it states “Sport and Recreation infrastructure requirements are dealt with explicitly in Policy CI3”, thus implying that the Policy CI1 does not apply to sport and recreation infrastructure. The requirement to accord with Policy CI1 in the Sport and Recreation Policy (i.e. Policy CI3) is therefore confusing as to whether Policy CI1 does or does not relate to sport and recreation infrastructure.</p>	<p>No proposed modifications</p>
Sport England	<p>In the interests of clarity, Sport England does not consider Policy CI3 to be sound if Policy CI3 E a. just requires accordance with Policy CI1 as Policy CI1 does not comply with the NPPF, paragraph 103, when considering sport and recreation facilities. If Policy CI3 E a. removes the requirement of meeting Policy CI1 then Sport England would consider Policy CI3 to be sound.</p>	<p>Noted and agreed.</p> <p>Suggested modification</p> <p>Amend Part E (a) of Policy CI3 as follows: Any loss of facilities would be replaced with by equivalent or better provision in terms of quantity and quality, in a suitable location in accordance with Policy CI1 (Safeguarding and securing social infrastructure); or</p>
Mayor of London	<p>Paragraph 6.1.7 of Policy CI1 sets out that LBH is ‘continuing to seek to identify and understand community need related to burial space’. LP2021 Policy S7 sets out that Development Plans should ensure provision is made for the different burial requirements of London’s communities. A needs assessment for burial space including an audit of existing provision should inform the level of need required in the draft Plan.</p> <p>LBH’s intention to work with other boroughs is supported, given this can be a cross-boundary issue, and the use of agreements such as through the Duty to Cooperate, or its successor, are encouraged.</p>	<p>Supported noted and welcomed</p> <p>A Statement of Common Ground has been entered into with Brent and Ealing with respect to joint working to consider this matter at a sub-regional level.</p> <p>Harrow will participate in the forthcoming London-wide Audit of London Burial Space Provision being undertaken by the Mayor of London to inform the forthcoming new London Plan. The audit is planned to be undertaken during Autumn 2025. It is understood from the GLA that the project will update the last audit and, at present, no significant divergence from the existing methodology is planned. Overarching aims will be to: determine existing and future supply and demand for space on a per borough basis; summarise capacities; and provide recommendations to address shortages. Once completed, it will form part of the evidence base for Borough-wide work on burial space and for each Borough’s development plan</p> <p>No proposed modifications</p>
Savills obo Whitbread	<p>Facilities providing a wide variety of services that are essential to the sustainability and wellbeing of a community such as education facilities, places of worship, burial space, policing and justice, health provision, community, polling stations, cultural, public houses (insofar as their value would necessitate protection under London Plan Policy HC7), recreation and sports facilities. This list is not intended to be exhaustive and other facilities may be included.</p>	<p>It is considered there is no need to repeat provisions of the London Plan.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Savills obo Whitbread	<p>C. The Council seeks to retain and protect existing social infrastructure and community facilities from loss to alternative non-social infrastructure or community uses. Any proposals that result in loss of these uses will be resisted, unless proposals can adequately demonstrate that:</p> <p>a. The existing social infrastructure will be replaced by an alternative or an enhanced social infrastructure use that would better meet the specific needs of existing and future users in regard to quantity, quality and location in line with Part B of this policy; or</p> <p>b. The site is unsuitable for the current use, or there is no longer a need for the current use or for an alternative community use (as evidenced by 12 24 months of effective marketing), and there is no projected future need, or the site is unsuitable for the current use and there is no need for any other suitable community use on the site; or</p> <p>c. The site is unsuitable for the current use and there is no need for any other suitable community use on the site; or</p> <p>d. The loss of social infrastructure would not result in a shortfall in provision of that use; or</p> <p>e. A replacement facility is provided that would better meet the specific needs of existing and future users in regard to quantity, quality and location; or</p> <p>f. Redevelopment would secure enhanced social infrastructure re-provision (on or off-site) ensuring continued delivery of social infrastructure and related services.</p> <p>D. Any proposal to redevelop an existing social infrastructure site should prioritise the use of the site for an alternative social infrastructure use.</p>	<p>Justification for these changes is unclear and they are not necessary for soundness.</p> <p>No proposed modifications</p>
Sunil Kapoor	<p>The safety and security of the borough will be put at risk as the police and hospital facilities are insufficient to cover the neighbourhood... how will this be addressed?</p>	<p>Emergency service and health provision is addressed in the Council's IDP.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Part 1A social infrastructure should be defined within the main part of the policy. Without understanding what it is the policies is difficult to follow and will not provide a reliable guide to Development. If the policy simply repeats that the London plan then it no it has no distinguishing function and serves no purpose.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Social Infrastructure is explained in para 6.1.1</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Part B It is not clear why the LPA is making it so difficult for you or enhance social community infrastructure to come forward. Social and community facilities are a good thing to be encouraged yet this provides an over complex system designed to make it difficult for them to come forward. It's unreasonable to have to show demonstratable need for facilities when by definition, an application for a scheme demonstrates need.</p>	<p>It is considered that the Policy sets appropriate and relevant criteria for new social infrastructure to ensure they are beneficial to the borough without adversely impacting upon other objectives and policies within the Local Plan.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	
Greg Dowden / Broadgate Development Partners Ltd	Part BB it is meaningless to require facilities to be located within the community they are intended to serve. Community is not defined and without this is a meaningless concept. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Policy is considered to be sufficiently clear as it establishes a link between intended uses and the location of a proposed infrastructure facility. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Part BD is very poorly drafted. What are “all abilities accessible buildings”? In addition why is it preferable to group all social infrastructure together. Resilience is created by diversity and yet this policy seeks to homogenise community provision and provide it at the rate of the lowest common denominator. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Terminology relates to the ability of individuals to access the building. Drafting could however be improved. Proposed modification Amend Part Bb as follows: ‘Are provided in flexible and; adaptable and-all abilities accessible buildings that are accessible to all, and; preferably co-located with other social infrastructure uses; and
Greg Dowden / Broadgate Development Partners Ltd	Part BE imposes a double burden on applicants and owners. If a new social infrastructure scheme is being promoted this in itself is a positive thing which meets local plan objectives. Why is it necessary to then compulsorily maximise wider community benefit through a community use agreement. It’s a good thing that such schemes come forward in the first place without being made to having penalised and made to provide double benefits. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	It is acknowledged that there maybe circumstances where community use agreements may not be appropriate and that the use of the word ‘must’ maybe unrealistic. An amendment could therefore be made to reflect this. Proposed modification Amend Part Be as follows: <u>Must Seek to maximise wider community benefit through the utilisation of measures such as community use agreements.</u>
Greg Dowden / Broadgate Development Partners Ltd	Policy C logically this policy should appear before new social infrastructure. It is plainly unreasonable and impossible to demonstrate no projected future need. If a scheme is able to demonstrate 24 months of effective marketing, then this of itself demonstrates that there is no projected future need. In addition no justification is given for the period of 24 months. Finally it is not clear why the additional requirement that there is an additional requirement to demonstrate no need for any other suitable community use on the site. This would be part of the effective 24 months marketing exercise which would be expected to pick up any existing demand for community facilities. This represents a double test which schemes must pass, which it will be exceptionally difficult to achieve as there are no criteria by which to judge the success or failure of the policy. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Reordering is not necessary for soundness but there is merit to the suggestion. Policy seeks to resist the loss of community facilities and 24 months represents a reasonable marketing period to demonstrate that there is no need for the facility. Part Ca is considered to represent a logical sequence with respect to marketing existing use and once that demonstrates no need for that current use, alternative uses may be considered (which may or may not have been evidence when marketed as the starting point in the current use is to be retained). Suggested modification Re-order policy so that Existing Social Infrastructure (heading and Parts C and D) appears first
Greg Dowden / Broadgate Development Partners Ltd	Part CB Any loss of social infrastructure will result in a shortfall in provision because provision after the loss will by definition be reduced. The Councils objective is already covered in CA and this policy is muddled and confusing and impossible to satisfy and should be deleted or redrafted to pick up this point.	It is acknowledged that Part C (suggested to be renumbered Part A) of the policy could be redrafted to be clearer as elements are repeated or redundant by virtue of other parts. This can be achieved by combining parts b and c. Suggested modification

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Amend submitted Part C as follows:</p> <p>C. The Council seeks to retain and protect existing social infrastructure and community facilities from loss to alternative uses. Any proposals that result in loss of these uses will be resisted, unless proposals can adequately demonstrate that:</p> <ul style="list-style-type: none"> a. There is no longer a need for the current use (as evidenced by 24 months of effective marketing), and there is no projected future need, or the site is unsuitable for the current use and there is no need for any other suitable community use on the site; and or b. The loss of social infrastructure would not result in a shortfall in provision of that use <u>A replacement off site facility is provided that would not result in a shortfall in provision and would better meet the specific needs of existing and future users in regard to quantity, quality and location; or</u> c. A replacement facility is provided that would better meet the specific needs of existing and future users in regard to quantity, quality and location; or dc. Redevelopment would secure <u>on-site</u> enhanced social infrastructure reprovision (on or off-site) ensuring continued delivery of social infrastructure and related services.
<p>Greg Dowden / Broadgate Development Partners Ltd</p>	<p>Policy CC and policy CD duplicate each other. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Noted and addressed in the suggested modifications above. Further guidance could be provided within supporting text.</p> <p>Suggested modification</p> <p>Amend paragraph 6.1.6 as follows:</p> <p>6.1.6 Any proposals involving the loss of a community use should be evidenced by 24 months of continuous effective marketing, at a reasonable market rate. Evidence should include various examples of online and local marketing through reputable agents. Where it can be demonstrated that healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, the requirements listed under Part C and D of the Policy will not apply. <u>Redevelopment of any facilities and subsequent reprovision should improve the experience of existing uses or the facility and incorporate additional capacity to meet future demand.</u></p>
<p>Greg Dowden / Broadgate Development Partners Ltd</p>	<p>Policy D this adds the post-marketing test of prioritising sites for alternative social infrastructure use. Any latent demand for such uses will be revealed by the 24 month marketing exercise and therefore does not need to be the subject of a separate policy provision. This policy is onerous duplicates policy CA and should be deleted.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>It is acknowledged that Part D duplicates Part Ca and could therefore be deleted.</p> <p>Proposed modification</p> <p>Delete Part D: Any proposal to redevelop an existing social infrastructure site should prioritise the use of the site for an alternative social infrastructure use.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Home Builders Federation	<p>Part A is unsound because it is unlawful and contrary to national policy.</p> <p>Part A states that: ‘Proposals will be required to make contributions towards the provision of enhanced or new social infrastructure, in locations where there are existing capacity issues or a need is identified, to support new development.’ 10</p> <p>Planning obligations cannot be used to remedy failings with existing infrastructure. It can be used to mitigate the effect of the development by providing new social infrastructure when a new need is created.</p>	<p>Suggested amendments to ensure consistency with national policy.</p> <p>Proposed modification</p> <p>Amend Part A as follows: ‘Proposals will be required to make contributions towards the provision of enhanced or new social infrastructure <u>where additional needs are generated. Facilities should be appropriately located to meet these needs.</u> in locations where there are existing facilities capacity issues or a need is identified, to support new development</p>

Policy CI2 - Play and Informal Leisure

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	<p>Development proposals likely to be occupied or used by children relate to residential or educational schemes, not all schemes. The policy should be amended to make this clear otherwise it will be its scope will be uncertain and confusing for applicants. Such confusion will delay applications being determined and prevent them from coming forward.</p> <p>For instance a building proposed to be used as a youth club may have no external space available to it at all. A youth club would clearly be a be beneficial use and social community infrastructure yet under this policy could not be certain of being granted planning permission because it could not provide the required amount of external play space.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Proposals will be assessed on a case by case basis to determine the applicability of the policy.</p> <p>No proposed modifications</p>

Policy CI3 - Sport and Recreation

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	<p>Part A proposals for new any new development will always be subject to Greenbelt and MOL space policies along with heritage and biodiversity policies and impact on residential amenity and highway safety. There is therefore no need for additional reference to these policies which should be deleted to simplify the plan, shorten it and prevent complexity and duplication.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Policy contains an appropriate criteria-based approach.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Part B takes no accounts of lawful development. Proposals that are ancillary or unlikely to require planning permission and lawful changes of use may achieve displacement or prejudice facilities in a way which this part seeks to prevent.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound</p>	<p>The Local Plan can only address development that requires planning permission.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	
Greg Dowden / Broadgate Development Partners Ltd	<p>Part D It is clearly unreasonable for even minor developments to facilitate community access through a community use agreement. This is a sledgehammer to crack a nut and would prove and unduly onerous. In addition it will almost be impossible to demonstrate that a community use is not feasible because the policy is drafted with the underlying presumption that it is.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p> <p>The policy is too loosely drawn to be effective and therefore should be re drafted to reflect this point or deleted.</p>	<p>Part D specifically excludes minor developments.</p> <p>No proposed modification</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Part E This policy is too vague. It does not make clear what sort of development would prejudice the use of a sports recreation facility and in what way prejudice is not defined in any way. As this is the integral factor to this policy and is un-defined the policy is uncertain and unworkable.</p> <p>In addition the criterion under Part EB that on any replacement, the replacement must clearly outweigh the loss of the existing facility is unreasonably onerous. The situation envisaged by this policy is for reprovision of alternative sports recreation facilities, not their loss. It is unreasonable that additional barriers should be put in the way of such proposals, particularly as the rest of the policy regime seeks to prevent the loss of such facilities in the first place. It is therefore unnecessary that need should be identified in the circumstances where there is only a change in sports and recreational provision, not a loss.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>It is considered that this policy will be sufficiently clear when applied to specific proposals in terms of whether or not it prejudices a sports and recreation facility.</p> <p>No proposed modifications</p>
Environment Agency	We recommend that the leisure uses map should include blue spaces (i.e. mark on the rivers) as well as the green spaces, given how our rivers could (with some work) contribute/are already contributing to community leisure.	<p>This representation does not go to the heart of soundness of the policy.</p> <p>No proposed modifications</p>

Policy CI4 - Digital and Communications Infrastructure

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	<p>This policy is uncertain and unclear. It is not possible to understand from the policy whether criteria A,B, and C all need to be satisfied or whether they are alternatives to each other.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Agree, the policy would benefit from clarification that all criteria apply.</p> <p>Proposed modifications:</p> <p>Amend Part Ab as follows: 'The siting and design of the installation would minimise its impact upon the amenity of neighbouring occupiers, the host building (where relevant), and the appearance and character of the area; and'</p>
Greg Dowden / Broadgate	Part C is also unreasonable because it puts the onus on the applicant to secure permission to use land which may be outside their ownership or control. If an operator cannot secure that co location then there is no further justification available to them and	The proposed approach is considered to be consistent with national policy and provides scope for applicants to demonstrate that use of existing infrastructure is not possible.

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Development Partners Ltd	no sanction against the owner of the infrastructure who is refusing to allow co-location. This policy will create deadlock and delay and prevent infrastructure from coming forward where it is needed. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	No proposed modifications
Historic England	Policy CI4.A.c Digital and Communications Infrastructure We welcome the reference to heritage at Policy CI4.A.c. However, we query the wording ' <i>unacceptable impact</i> ', based on it being vague and ambiguous. We suggest revisiting it. Perhaps ' <i>where harm is avoided and minimised</i> ' and/or ' <i>the benefits outweigh the harm to</i> ' might be clearer?	Support noted. Criterion relates to multiple policy considerations and wording is considered appropriate as 'harm' has a particular meaning in the context of heritage assets but not the other assets listed. No proposed modifications

Strategic Policy 7 – Green Infrastructure

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
CPRE	<ul style="list-style-type: none"> Under CN3: Reducing Flood Risk and CN4: Sustainable Drainage, the Council should identify any derelict green sites or disused playing fields (whether privately owned or not) and allocate these for a clear green infrastructure purpose i.e. with a nature, flood management or recreation designation. Railway sidings can and should be allocated for nature recovery. Front and back garden vegetation / natural surfaces can be protected – including with TPOs for trees and as part of Pavement Crossover policies. We have created a map showing sites in Harrow which are not being actively managed, possibly derelict, usually neglected, sometimes deliberately. These are sites which are usually protected Green Belt or Metropolitan Open Land - protected from development to ensure London does not sprawl into the countryside and so land in London is used efficiently - and so there remain large open spaces within the city in perpetuity. The sites are usually, but not always, in private ownership. They may have been bought by speculators and developers. The map can be viewed here: https://www.google.com/maps/d/u/0/edit?mid=17h5tLN5_WE1D7a4kWHsTAifxUw_-1-s&usp=sharing Our interest in identifying these sites is to demonstrate that there are many sites which have vast potential to fulfil the Mayor's habitat creation targets - as well as sites to build the many wetlands which are needed to make London resilient to climate change and to filter rainwater from road drains to stop road run-off pollution going straight into London's rivers. 	Site have been allocated on the basis of up-to-date evidence. No further allocations are proposed at this stage. No proposed modifications
CPRE	Finally, attached to this submission is a separate image file outlining our proposed M25 of trees route. The line in yellow shows route for creating connectivity in tree cover around the capital, across borough boundaries. We very much hope that as part of its land-use planning, Harrow Council could support and encourage a range of treescape along this line ranging from planting and allowing natural regeneration of native woodland, to orchard areas, to areas of intensified street tree planting and the creation of garden streets in response to the urgent need for action on climate change and biodiversity strengthening. We are happy to talk to the Council about the map and how it has been	Policies in the emerging Local Plan support tree planting alongside the policies in the London Plan. No further allocations are proposed at this stage. No proposed modifications

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>created. It is important to stress the route is provisional and we are in the process of further landowner and community engagement to provide a further layer of verification of the suitability of these sites. A higher resolution zoomable version of the map, and underlying information, is available direct from Greenspace Information for Greater London (GiGL). Members of the Tree Ring Steering group include The Conservation Volunteers, Woodland Trust, Trees for City and Forestry England. The plan also has the unanimous support of the More Natural Capital Coalition - a coalition of 19 environmental charities working across the capital.</p> <p>We have identified the following sites in Harrow which could be considered for tree planting and woodland creation to contribute to a London Tree Ring Community Forest: HRW001 The Hive / Whitchurch Lane HRW002 Watling Farm South HRW003 Sylvia Avenue Open Space HRW004 Pinnerwood Farm HRW005 Raghuvanshi Trust Sports Ground and Hall</p>	
Mayor of London	<p>Strategic Policy 07 and Policy GI1 of the draft Plan is clear that Green Belt and Metropolitan Open Land (MOL) will be protected from inappropriate development which is consistent with LP2021 Policies G2 and G3 which is noted and welcomed.</p> <p>In the site allocations, two Green Belt sites have been identified for development. One of them is at Watling Farm and is for the 12 to 13 additional Gypsy and Traveller pitches required to meet identified need. The other site is the Royal National Orthopaedic Hospital (RNOH) and is allocated for the modernization and extension of the hospital as well as 500 new homes. Both sites are currently allocated in the adopted Local Plan and also have associated but lapsed planning permissions. As such, it is assumed that LBH may need to establish exceptional circumstances to justify the proposed developments in these allocations again.</p>	<p>Comments noted. Allocations should be clearer on the proposals for these sites. It appears that no further release of Green Belt land is proposed so Exceptional Circumstances will not apply.</p> <p>There appears to be no extant planning consent so allocations should recognise the Very Special Circumstances will need to be demonstrated to justify inappropriate development.</p> <p>Suggested modification</p> <p>Note that that proposals for inappropriate development on these sites will need to demonstrate very special circumstances.</p>
Carter Jonas LLP	<p>Strategic Policy 07 (Green Infrastructure) sets out that green infrastructure should be identified, protected, restored, enhanced, and extended. The planning, design, and management of green infrastructure should be integrated, and the context carefully considered to ensure the most appropriate benefits are targeted, maximised and maintained.</p> <p>As previously set out, the requirement for new development to deliver green infrastructure cannot be understated and it is on sites such as Eastman Village where this delivery can be realised.</p> <p>Overall, continue to agree with the overall strategy to protect and enhance green and open spaces, improve biodiversity and encourage opportunities for food growing.</p>	<p>Comments noted</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Policy 07A. Green infrastructure should be identified and it is the function of the local plan to do so.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Green Infrastructure is identified and on the figure on page 224 of the plan and the Policies Map.</p> <p>No proposed modification</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	<p>Part B The circumstances where enhanced access will be appropriate should be set out this policy if it is to remain. There will be some elements of green of a structure which are in private ownership and access is not appropriate. The policy should make this distinction and set out clear criteria.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Policy provides a high-level framework for the approach to supporting the delivery Green Infrastructure across the borough. This level of detail is neither appropriate nor necessary.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Part C repeats policies that appear elsewhere in the plan and the duplication adds complexity and unnecessary length towards us already and over long document. Policy D imposes a blanket ban on development of open space will remove any flexibility and will make the objective of achieving the LPA's housing targets more difficult to achieve than it already is. A blanket ban on development is a hostage to fortune for the LPA and criteria based policies should be developed which will set out the circumstances and types in which Type of development can come forward.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Part C reflects the provisions of national policy and the London Plan and sets the strategic context for Green Infrastructure in the borough, which Green Belt and Metropolitan Open Land represents a significant part of.</p> <p>Similarly Part D replaces national and regional policy and outlines where development maybe permitted and cross-references to the relevant detailed policy.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Policy E already conflicts with policy D because by definition small scale and features will result in the net loss of green space. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Part D allows small scale facilities to improve the functioning of open space. Facilities of this nature will support the overall function and retention of the open space and form an integral part of it rather than representing the loss of open space in the literal sense.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Policy F is a statement of aspiration not a robust planning policy. Neither quality and functionality are explained or defined and these are key to the function and operation of the policy.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Policy provides a high-level framework for the approach to supporting the delivery Green infrastructure across the borough and its drafting is considered appropriate. The level of detail suggested is neither appropriate nor necessary.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Policy G repeats policies that appear elsewhere in the plan and duplicates the effect of the national NPPF policy framework.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Part G is consistent with other parts of the plan and national policy and sets biodiversity in the strategic context with detailed policy provided in the relevant policy.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Part H as drafted imposes duties on areas which may not be at risk of flood and maybe located in flood zone one. It's unreasonable to expect areas which are not subject to flood risk to consider or provide flood risk reduction.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Part H reflects the need to address flood risk across the borough in the context of Green Infrastructure and cross-references the relevant detailed policy.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	Part I is a statement of aspiration that is probably drafted, and is not a planning policy. For instance it is not clear that there is a targeted local ecosystem need engaged by this policy . The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Policy provides a high-level framework for the approach to supporting the delivery Green infrastructure across the borough and its drafting is considered appropriate. The level of detail suggested is neither appropriate nor necessary. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Policy J repeats policies that appear elsewhere in the plan. It adds unnecessary complexity and repetition. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Part J is consistent with other policies in the plan and recognises the role heritage assets have in Green Infrastructure. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Part K repeats policies elsewhere in the plan and even states the policy which it repeats (policy H 14). It adds unnecessary complexity and repetition The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Part K is consistent with other policies in the plan. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Part L is an aspirational statement not a planning policy that repeats emerging policy G15. It adds unnecessary complexity and repetition. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Policy provides a high level framework for the approach to supporting the delivery Green infrastructure across the borough, that is consistent with other policies in the plan No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Part M is unnecessary. If the LPA wish to pursue cross-borough collaboration than they are able to do so without a separate planning policy to encourage them to undertake it. The presence of this plan is unnecessary and just adds additional complexity. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Part M provides statement of intent for the Council which is consistent with national planning policy and the Council's corporate policy and demonstrates that Green Infrastructure needs to be considered holistically, including spatially and across administrative boundaries. No proposed modifications
Carter Jonas for Barratt London	Strategic Policy 07 (Green Infrastructure) sets out that green infrastructure should be identified, protected, restored, enhanced, and extended. The planning, design, and management of green infrastructure should be integrated, and the context carefully considered to ensure the most appropriate benefits are targeted, maximised and maintained. As previously set out, the requirement for new development to deliver green infrastructure cannot be understated and it is on sites such as Eastman Village where this delivery can be realised. Overall, continue to agree with the overall strategy to protect and enhance green and open spaces, improve biodiversity and encourage opportunities for food growing.	Support noted. No proposed modifications
Environment Agency	We're pleased to see the recommended changes to this policy and understand that blue infrastructure is discussed further under Chapter 08. We do, however, believe that the supporting text 7.0.6, could be clearer in specifying which EA guidelines should be followed in relation to this, such as Flood risk activities: environmental	Support noted. Flood risk matters are covered elsewhere in the plan. No proposed modifications
Historic England	Strategic Policy 07.J Green Infrastructure.	Comments and support noted

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>We welcome criteria J of the strategic Green Infrastructure policy but suggest that it is revisited to better capture the following points: 1) Existing green/ blue spaces are often of historic character and may qualify as heritage assets, meaning that they require management in relation to heritage significance, as well as the value of their GI function. 2) That, as per Natural England's GI guidance, a historic character-led approach (which is comparable to a design-led approach in seeking to understand context and then responding appropriately) should be used to identify locations for new green and blue infrastructure, shape designs and maximise the benefits for both the historic and natural environment.</p>	<p>Reference to the heritage value of green infrastructure itself could be incorporated into Part J of the policy, in recognition that they may themselves have heritage value.</p> <p>Suggested reference to Natural England's GI Guidance in the supporting text at paragraph 7.0.2 is considered to have merit.</p> <p>Suggested modifications</p> <p>Amend Part J of the policy as follows: 'Green spaces infrastructure, which itself may have heritage value, should support the historic environment through their ability to enhance heritage assets and link to local history'.</p> <p>Insert the following at the end of paragraph 7.0.2: 'All development should avoid putting pressure on vulnerable ecosystems and mitigate risk through careful planning of green infrastructure, in line with Paragraph 159 of the NPPF 2023. Proposals relating should take account of Natural England's Green Infrastructure Guidance.'</p>

Policy GI1 - Green Belt and Metropolitan Open Land

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
CPRE	<p>We support the Plan's intention to protect the openness and permanence of the Green Belt and MOL, according to the National Planning Policy Framework (NPPF). We would like the Plan to explore new areas of green space that could be designated as MOL, including land which is currently not available to Harrow residents or has been taken out of public use by developers (see the Derelict Green Sites section below). We are pleased that the Council will resist any alteration to the boundaries of MOL at Site Allocation O5 – Harrow School Estate & John Lyon School.</p>	<p>Support noted. MoL designation reflects the latest evidence.</p> <p>No proposed modifications</p>
Historic England	<p>Policy GI1: Green Belt and Metropolitan Open Land</p> <p>We welcome the reference to the protection and enhancement of heritage assets at GI1.C.d. However, we query the preceding text '<i>Proposals for the beneficial use of land in the Green Belt and MOL will be supported where the use would not have an inappropriate impact on the openness and permanence of the Green Belt...</i>'. Might the policy be clearer if it stated: '<i>Proposals for the beneficial use of land in the Green Belt and MOL will be supported where they do not harm use would not have an inappropriate impact on the openness and permanence of the Green Belt...</i>'.</p>	<p>The Council does not agree that this makes things clearer. Criterion relates to multiple policy considerations and wording is considered appropriate as 'harm' has a particular meaning in the context of heritage assets but not the other assets listed.</p> <p>No proposed modifications</p>
Hertsmere Borough Council	<p>We note that point A(b) states that "development adjacent to Green Belt should not have a significant detrimental effect on the openness of the Green Belt, and must respect the character of its surroundings." We are concerned that such a policy would not be justified or consistent with the NPPF. Whereas the impact of development on the setting of certain heritage assets is an important consideration, it is unclear how development adjacent to the Green Belt can or should be assessed in terms of its impact on Green Belt openness. Development of land outside of the Green Belt should not ordinarily be subject to the same tests as the development of land within the Green Belt.</p>	<p>Comments noted. It is anticipated that the plan will be examined under the December 2023 NPPF, which does not refer to Grey Belt land. Inclusion of a statement in the supporting text to confirm this would be beneficial.</p> <p>A statement of common ground has been entered into with Hertsmere which acknowledges that the plan will be examined under the 2023 version of the NPPF.</p> <p>Suggested modification</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>With the publication of the new NPPF and the definition of the Grey Belt, Hertsmere borough Council would expect to see relevant land being released to provide for the shortfall in new homes being delivered by Harrow Council.</p> <p>The Royal National Orthopaedic Hospital is referenced in the support text and is located close to the borough boundary with Hertsmere, serving a much wider community. We would support a pragmatic approach to redevelopment within the site which upgrades the current facilities and building stock.</p>	<p>Amend Para 7.1.1 as follows: Harrow's Green Belt accounts for 21.6% of Harrow's land area, and benefits from a variety of uses that help to maintain its openness and character. As well as a number of farmland and woodland areas, uses of the Borough's Green Belt include sports grounds, public open space, nature reserves and burial space. The Green Belt's purpose is to provide a break between urban areas and rural areas. For the avoidance of doubt, this policy has been prepared to reflect the provisions of Green Belt policy contained in the NPPF (December 2023).</p>
Mayor of London	LBH is proposing to adjust an area of MOL, as part of a land swap which will result in no net loss of MOL. This is at Harrow on the Hill School, for which a planning application was allowed at appeal. The Mayor has no objections to this proposed land swap given that there will be no net loss of MOL.	<p>Comments noted</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	The LPA have not undertaken a greenbelt and MOL review. This policy is therefore not based on a sound evidence space and should not remain in the plan in the absence of such a review. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	<p>A Green Belt review is not required to support the policy, and the plan is considered to be supported by a proportionate evidence base having regard to the NPPF, London Plan and proposed spatial strategy.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Part B is vague and uncertain and appears to set up a buffer zone to the greenbelt which is not acknowledged in national planning policy in the NPPF. The green belt is characterised by its openness and lack of building and this policy requires adjoining sites to be similarly unbuilt and open. This is unnecessarily restrictive and will apply greenbelt policies to areas beyond the greenbelt which is contrary to national green belt policy.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>The Council does not agree with the interpretation and implications of the policy suggested by the representation.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Part C does not define what a beneficial use is that that it seeks to encourage or control. In addition the double negative formula introduced by the "...would not..." have an impact on the policy which makes it clumsy and confusing and makes the policy less intelligible than it should otherwise be.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Paragraph 150 of the NPPF requires local authorities to plan positively to enhance the beneficial use of land in the Green Belt; Part C of the policy reflects this.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Part D adds additional factors into the national greenbelt test that do not appear in the National Green Belt test which creates a conflict with national policy. In addition all the factors that it introduces as criteria are entirely subjective and will give no certainty to applicants or lands in bringing schemes and sites forward.</p> <p>The national Greenbelt policy is onerous enough without adding further local complications. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Part D is broadly consistent with para 154 (g) of the NPPF.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate	Positive should be deleted. It adds additional factors into the national greenbelt test that do not appear in the National Green bit test belt test. This creates a conflict with national	It is unclear what instance of 'positive' is being referred to as it does not appear to be include in the policy.

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Development Partners Ltd	<p>policy. Addition all the factors that it introduces as criteria or entirely subjective and will give no certainty to applicants or lands in bringing schemes and sites forward. The national Greenbelt policy is ownerless enough without introducing a local subjective gloss on that policy.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	<p>Part E introduces a subjective gloss to the national planning policy test which is unjustified. It is also difficult to understand and seems to apply to the very specific case of a smaller site forming part of a larger site within the greenbelt. The Policy is confusing and not effective.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Noted; clarification that part E relates to allocated sites in the Green Belt would address this point.</p> <p>Suggested modification</p> <p>Amend Part E as follows: <u>Proposals on allocated sites GB1 and GB2 will be required to demonstrate very special circumstances and on Green Belt or MOL land that may not be in accordance with the NPPF should be put forward in the context of a comprehensive, long term plan(s) for the site as a whole.</u></p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Part A does not reflect the national greenbelt policy. This requires very special circumstances to exist and the policy instead creates the possibility for very special circumstances that haven't been as demonstrated as clearly as the LPA might wish and which will result refusal of planning permission if they exist. This is contrary to national planning policy and the policy is therefore policy F is therefore confusing and ineffective and will hamper Development coming forward.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>This representation is unclear.</p> <p>No proposed modifications</p>

Policy GI2 - Open Space

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Sport England	<p>In relation to Policy GI2 C. e., Sport England does not consider the wording to align with the NPPF, Paragraph 103, and its own Planning Policy as neither accepts critical social infrastructure being built on sports and recreational buildings and land, including playing fields, unless that critical infrastructure is a sport facility (or the area/facility lost is replaced or identified as surplus). As a result, Sport England advise that Policy GI2 C. e is omitted for this policy to be sound.</p>	<p>It is acknowledged that criterion (e) as currently drafted is not consistent with the NPPF and the loss of sports facilities, and that such matters are covered in Policy CI3 Sport and Recreation.</p> <p>Suggested modification</p> <p>Amend Part C as follows: Existing open space, sports pitches, recreational buildings, and playing fields should not be built on unless: a. An assessment has been undertaken that clearly demonstrates the open space, buildings or land are surplus to requirements; or b. The loss resulting from the proposed development would be replaced by equivalent or better provision, in terms of quantity and quality in a suitable location; or c. <u>Proposals relating to the loss of sports and recreation facilities meet the criteria set out in part E of policy CI3</u> The proposals will result in the loss of</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>sports and recreation facilities (including pitches) and meet the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use, or</p> <p>d. The proposal is for a small ancillary use (maintenance shed, food & beverage, changing rooms) that would enhance the useability of the space and surrounds., or</p> <p>e. The development is required for critical social infrastructure, the positive benefits of which clearly outweigh the loss of the current or former use.</p>
CPRE	<p>We strongly support the Plan's commitment to ensure that development proposals must not result in the net loss of open space. The Plan should address green space needs in terms of green space per person to reflect any deficiency which may be created through high density development and more generally to ensure there is enough green amenity space. The Plan should also introduce a policy to create new green open spaces especially in Areas of Deficiency. 'Streetparks' can be created from 'grey space' i.e. superfluous roads should be converted to accommodate new rain gardens, pocket parks or whole or part of a street converted to a 'streetparks' as has been done at Alfred Place in Camden.</p>	<p>Support noted and welcomed. Proposed site allocations identify sites that are sufficiently large enough to potentially accommodate public open space; many of these sites are in areas of open space deficiency.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>The four criteria which this policy seeks to apply all appear to be mandatory. It is not clear which development proposals must provide them, and as drafted all proposals must. This is unreasonable and onerous and will stop development coming forward. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Criteria in Part A are considered sound and consistent with national policy.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Part B is problematic as not all major development proposals will be able to incorporate publicly available space. If sites cannot contribute, they will be contrary to this policy, but this is a matter where CIL can mitigate impacts. This is a matter best dealt with by CIL and not planning policy. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>It is acknowledged that Part B would benefit from a sequential approach to open space provision.</p> <p>Suggested modification</p> <p>Amend Part B as follows: 'Major development proposals <u>must should</u> incorporate new publicly accessible open space in accordance with the standards set in The London Plan unless it can be clearly demonstrated that it is not feasible, in which case off site contributions will be required</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Part C should be drafted to make clear that existing open space and sports pitches and Playing fields can be built on where the LPA cannot meet its housing target. Without this flexibility the chances of the housing target being met by the LPA are reduced.</p>	<p>Suggested modification does not reflect NPPF.</p> <p>No proposed modifications</p>
Donal Grey	<p>I am not sure why some parks have been given the status of MOL vs DOS but both should have the same protections. Byron park is the only park in Wealdstone and should be protected from over development to keep the area liveable (especially with the thousands of extra homes being built) - the community needs a place to escape and allowing 12 storey tower blocks next to the park will harm the environmental character of the park and would be inappropriate.</p>	<p>Comments noted. Metropolitan Open Space (MOL) and public open space have different functions, as set out in the London Plan.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Nexus Planning obo Taylor Wimpey	the Plan lacks a comprehensive approach to addressing the open space deficiencies identified and fails to allocate a sufficient range of sites that are capable of delivering new, quality green spaces. The Plan's heavy reliance brownfield sites and on smaller sites, many of which cannot support the provision of adequate open space undermines its ability to meet its own strategic objectives related to public open space and community facilities.	The plan supports the provision of new open space in accordance with national policy, as well as its retention (and that of Green Belt and Metropolitan Open Land). No proposed modifications
Nexus Planning obo Taylor Wimpey	Criterion B of Policy GI2 requires modification to require major development to deliver new publicly accessible open space. In the event that off-site contributions are made, the policy should require the location at which the provision would be delivered to be identified. Without such a requirement, there is no certainty that the open space needs arising from development within the London Borough of Harrow would ever be met. Furthermore, to deliver against the relevant Strategic Objective with respect to open space, the spatial strategy requires modification to allocate sites that are capable of delivering areas of new public open space (of the appropriate typologies to address existing shortfalls) to serve the increasing population.	Suggestion that there is a need for further guidance is agreed. It is suggested that this is incorporated into the supporting text with the following paragraph: Suggested modification <u>Insert new paragraph after existing paragraph 7.2.3 as follows: Proposals for new development should, in the first instance, seek to provide open space on site. Alternative approaches to meeting needs will be considered as an exception, including circumstances where evidence demonstrates that the size of the site is not sufficient to deliver useable open spaces and the needs of residents can be better met through other means, such as appropriate off-site provision or improvements to the quality of nearby open spaces. The proposed approach should be considered at the pre-application stage. Where off site provision is found to be an appropriate solution, this should be within walking distance of the development site and its provision will be secured through a S106 planning obligations agreement.</u>

Policy GI3 - Biodiversity

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Elite Planning	<p>The Environment Act 2021 sets a statutory minimum of 10% BNG, permitting higher targets only when supported by robust, proportionate evidence. Harrow's proposed 15% target lacks such justification, rendering it inconsistent with national policy and, therefore, unsound.</p> <p>Inadequate Evidence Base - The National Planning Policy Guidance (NPPG) requires that any uplift in BNG targets be underpinned by clear evidence demonstrating local need and viability. Harrow's justification for the 15% target is based on general assertions of biodiversity deficits without detailed, site-specific data.</p> <p>Harrow's reliance on off-site biodiversity credits intensifies the need for cross-boundary coordination. The Council has not demonstrated adequate collaboration to secure the necessary off-site habitat banks or biodiversity units, risking a breach of the duty to co-operate.</p> <p>Impact on Housing Delivery and Land Supply - Harrow's Local Plan aims to deliver 16,040 homes by 2041, contributing to the national housing target of 370,000 new homes annually. The financial and practical burdens imposed by the combined requirements of Policies GI3 and GI4 jeopardise this objective. Increased development costs may deter investment, delay projects, and reduce overall housing output, undermining both local and national housing strategies.</p> <p>Policy H4 seeks to maximise affordable housing delivery. However, the cumulative costs associated with meeting UGF and BNG requirements are likely to compel developers to</p>	<p>It is considered that the evidence base is sufficient to justify the policy and its impact upon viability has been tested in the Whole Plan Viability Assessment. The ability to achieve offsetting within the borough is addressed in the evidence base and does not raise any duty-to-cooperate issues.</p> <p>No suggested modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>renegotiate Section 106 obligations, prioritising BNG compliance over affordable housing contributions. This trade-off directly undermines Harrow's ability to address pressing local housing needs and exacerbates affordability challenges.</p> <p>The stringent greening and biodiversity requirements may render certain sites financially unviable, effectively reducing the borough's developable land supply. This contraction in available land further impedes the Council's capacity to meet its housing targets and may lead to increased competition for remaining sites, driving up land prices and, consequently, housing costs. The financial obligations imposed by the 15% BNG target will cause inflation of housing costs would promote urban sprawl</p>	
HTA obo Tide Construction	<p>The Council's requirement to increase the level of required biodiversity net gain (BNG) set out in statute is unjustified, setting a minimum net uplift in biodiversity unit value of 15%. This policy is therefore unsound, has not been justified and fails to align with national policy and should therefore be amended.</p> <p>The statutory provisions for BNG are new and time is required to understand how the national 10% requirement will operate in practice. This is particularly the case when this measure can't be seen in isolation from all the other measures in the plan which will impose significant additional costs in the delivery of development on brownfield sites which both government and the London Plan want to see prioritised.</p> <p>Tide Construction is committed to improving BNG and has a track record for doing so. However, the characteristics of sites vary enormously and is not always possible to deliver on-site provision.</p> <p>Having a higher target of 15% and where no on-site provision is deliverable will result in punitive payments further eroding viability and the likelihood on some sites of no proposals coming forward at all. For these reasons, the policy should be amended prior to submission to reflect the statutory BNG requirement of 10% in accordance with legislation and national policy</p>	<p>It is considered that the evidence base is sufficient to justify the policy and its impact upon viability has been tested in the Whole Plan Viability Assessment.</p> <p>No suggested modifications</p>
Carter Jonas for Barratt London	<p>At Part G of Policy GI3, the reduction from 20% to 15% from the Regulation 18 version to the Regulation 19 version of the Local Plan is supported given viability challenges in some areas.</p> <p>Although Part A of Policy GI3 makes reference to development proposals which are exempt from the Environment Act 2021, this is not reiterated in Part G (which sets out the specific BNG requirements for new proposals) which may create confusion during the determination of planning applications which are exempt due, to the inconsistency with the legislation.</p> <p>Overall, continue to agree with the overall strategy to protect and enhance green and open spaces, improve biodiversity and encourage opportunities for food growing. We also agree to the proposal to seek a greater level of biodiversity improvement from new development, however to ensure that Policy GI3 is consistent with the Environment Act 2021, we suggest the following revised wording to Part G of the policy:</p> <p>“G. All major and minor development proposals, <i>unless exempt under the Environment Act 2021</i>, must be supported by a proportionate Biodiversity Net-Gain Plan (BGP) which clearly identifies how the development will minimise harm and maximise biodiversity gain...”</p>	<p>Support noted and suggested modification is considered to have merit</p> <p>Suggested modification</p> <p>Amend wording as proposed, with part G referring to the 2021 Environment Act, as follows:</p> <p>“G. All major and minor development proposals, <u>unless exempt under the Environment Act 2021</u>, must be supported by a proportionate Biodiversity Net-Gain Plan (BGP) which clearly identifies how the development will minimise harm and maximise biodiversity gain...”</p>
Savills obo Solum	<p>This policy confirms that development proposals must protect and enhance the biodiversity and natural capital found within the Borough.</p>	<p>It is considered that the evidence base is sufficient to justify the policy and its impact upon viability has been tested in the Whole Plan Viability Assessment (evidence base will be updated to reflect this fact).</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>Biodiversity Net Gain (BNG) is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a BNG of 10%. Criterion a. of Section G of Policy GI3 requires all development proposals to deliver a minimum of 2 biodiversity units per hectare or a minimum net uplift in biodiversity unit value of 15%, whichever is greater.</p> <p>The Harrow Biodiversity Net Gain Draft Working Paper (November 2024), which forms part of the Local Plan evidence base, states that this target is caveated as it has not been viability tested. It goes on to explain that it is a working paper that will evolve as such information is available and further evidence base gathering will continue up to the Regulation 22 phase on local need, local opportunities and the impacts on viability for development.</p> <p>With regard to viability, this inflated requirement would place significant limitations upon developers, particularly those proposing development proposals on constrained sites. It is therefore requested that the BNG requirement is revised to 10% as per the Environment Act.</p>	<p>No suggested modifications</p>
L&Q	<p>it is highlighted that points a and b above are onerous, noting that the nationally mandatory biodiversity net gain (BNG) requirement is 10%, and given the existing urban greening factor requirements set out in the London Plan. Moreover, as the mandatory BNG has only recently been introduced, there is significant uncertainty within the development industry as to the practical application of these requirements. Therefore, we request that the Council applies some flexibility in the application of a 15% BNG requirement especially where it can be demonstrated that there is an impact on scheme viability, or site constraints mean meeting a and b is not possible.</p>	<p>It is considered that the evidence base is sufficient to justify the policy and its impact upon viability has been tested in the Whole Plan Viability Assessment.</p> <p>No suggested modifications</p>
L&Q	<p>Additionally, we raise significant concern with part c of the policy. We presume that the 'biodiversity enhancements' reference relates to the description of 'wildlife enhancements' set out in the supporting text at 7.3.9, where the examples provided include 'green or brown roof and living walls, bat, bird and invertebrate bricks and boxes bird feeding stations and baths, hibernacula loggaries and log piles, nectar bars, wildlife ponds or scrapes and hedgerow planting'. Requiring one of these items per residential dwelling on large scale major developments is entirely impractical; for some of the large scale schemes this would require hundreds or potentially thousands of 'biodiversity enhancements' which would be highly onerous and impractical to deliver. Parts a and b of the policy together already ensure a significant enhancement of biodiversity, and it is recommended that part c of the policy be removed.</p> <p>As currently drafted, these requirements are onerous and exceed beyond London Plan and national standards, imposing costly requirements at a time when development viability is very challenging.</p>	<p>It is considered that the evidence base is sufficient to justify the policy and its impact upon viability has been tested in the Whole Plan Viability Assessment.</p> <p>It is considered that Part Gc is reasonable and achievable on larger sites, either within the building fabric or in communal areas / amenity space. It is agreed clarification is required with respect to wildlife / biodiversity enhancements. Part Gc is considered different to Part Ga and Gb as those relate to biodiversity habitats whereas Gc (with clarification) is directed to wildlife specifically.</p> <p>Suggested modification:</p> <p>Amend Part Gc as follows: 'A minimum of one <u>biodiversity wildlife</u> enhancement per residential dwelling; and'</p>
L&Q	<ul style="list-style-type: none"> Biodiversity Net-Gain Plan (BGP) which clearly identifies how the development will minimise harm and maximise biodiversity gain. Proposals will be required to demonstrate compliance with the criteria below and provide (unless shown to be unviable or impractical): A minimum of one biodiversity enhancement per residential dwelling; and Details surrounding the delivery, monitoring and maintenance of BNG units, whether wholly on-site, or utilising locally strategic off-setting location(s). 	<p>It is considered that the evidence base is sufficient to justify the policy and its impact upon viability has been tested in the Whole Plan Viability Assessment.</p> <p>No suggested modifications</p>
Savills obo Whitbread	<p>G. All major and minor development proposals must be supported by a proportionate Biodiversity Net-Gain Plan (BGP) which clearly identifies how the development will minimise harm and maximise biodiversity gain. Proposals will be required to demonstrate compliance with the criteria below and provide:</p>	<p>It is considered that the evidence base is sufficient to justify the policy and its impact upon viability has been tested in the Whole Plan Viability Assessment.</p> <p>No suggested modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>a. A minimum of 2 biodiversity units per hectare; or b. A minimum net uplift in biodiversity unit value of 10% as set out by national guidance 20%, whichever is greater; and; and c. A minimum of one biodiversity enhancement per residential dwelling; and d. Details surrounding the delivery, monitoring and maintenance of BNG units, whether wholly on-site, or utilising locally strategic off-setting location(s).</p>	
<p>Swifts Local Network: Swifts & Planning Group</p>	<p>Policy GI3 Biodiversity paragraph 7.3.9 is welcome but it is not sound because there is insufficient detail about best-practice guidance to be effective, and it is not consistent with national policy, because it does not consider London Plan 2021 G6 B4 which calls for features such as artificial nest sites specifically: "that are of particular relevance and benefit in an urban context [i.e. swift bricks]", NPPG 2019 Natural Environment paragraph 023 which specifically highlights the importance of "swift bricks", nor NPPF December 2024 Paragraph 187 (d) (page 54) which states: "planning policies should... incorporate features which support priority or threatened species such as swifts".</p> <p>Please add to Policy GI3: Swift bricks are a universal nest brick for small bird species and should be installed in all new-build developments including extensions in accordance with best-practice guidance such as BS 42021 or CIEEM.</p> <p>Also please add: Swift bricks are a significantly better option than external nest boxes as they are a permanent feature of the building with no maintenance requirements, improved thermal regulation, and aesthetic integration with the design.</p> <p>In more detail, further reasons for these changes are as follows:</p> <p>Swift bricks are excluded from the DEFRA Biodiversity Net Gain metric so need a separate clear policy.</p> <p>Swift bricks are universal nest bricks for small bird species, e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: https://www.nhbc.co.uk/binaries/content/assets/nhbc/foundation/biodiversity-in-new-housing-developments.pdf), which are essential to save a variety of endangered red-listed urban building-dependent small bird species such as swifts and house sparrows.</p> <p>Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have improved thermal regulation with future climate change in mind.</p> <p>Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM (https://cieem.net/resource/the-swift-a-bird-you-need-to-help/)).</p>	<p>As part of the development plan for Harrow, policies in the London Plan will continue to apply when the Local Plan is adopted. Part Gc requires wildlife enhancement for residential development and paragraph 7.3.9 gives examples of these, including bird boxes (which could include swift bricks for smaller birds).</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>The UK Green Building Council (UKGBC) is a membership-led industry network and they have produced a document entitled: "The Nature Recovery & Climate Resilience Playbook" (Version 1.0, November 2022) https://ukgbc.org/resources/the-nature-recovery-and-climate-resilience-playbook/ This document is designed to empower local authorities and planning officers to enhance climate resilience and better protect nature across their local area, and includes a recommendation (page 77) which reflects guidance throughout this document: "Recommendation: Local planning Authorities should introduce standard planning conditions and policies to deliver low cost/no regret biodiversity enhancement measures in new development as appropriate, such as bee bricks, swift boxes [and bricks] and hedgehog highways."</p> <p>Many other local authorities are including detailed swift brick requirements in their Local Plan, such as the majority of London boroughs in their draft or adopted plans including Tower Hamlets Local Plan Regulation 19 stage (Policy B04 paragraph 18.72, https://talk.towerhamlets.gov.uk/local-plan),</p> <p>which follows the exemplary swift brick guidance implemented by Brighton & Hove since 2020,</p> <p>and Wiltshire Local Plan Regulation 19 stage, which requires an enhanced number of 2 swift bricks per dwelling (policy 88: Biodiversity in the built environment, page 246 - "As a minimum, the following are required within new proposals: 1. integrate integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling;" https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19),</p> <p>so such an enhanced level should be considered. Also othe</p>	
RAF Northolt	<p>The MOD additionally note the support for the proposed Policy GI3: Biodiversity and nature recovery and welcomes that the Council have identified in section 7.3.11 "Some forms of environmental improvement or enhancement may not be compatible with aviation safety. Where off-site provision is to provide BNG, the locations of the host development and any other site should be assessed against statutory safeguarding zones and the Ministry of Defence should be consulted where significant elements are in the statutory safeguarding zone for RAF Northolt"</p>	<p>Support noted and welcomed.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>This policy is now redundant because of the national biodiversity net gain policy and the associated metric and Planning condition. These statutory provisions will secure the enhancement and measurements that is required and further planning policies are unnecessary to repeat this process. This policy should be deleted because it's duplicates National policy.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>It is considered that the evidence base is sufficient to justify the policy and its impact upon viability has been tested in the Whole Plan Viability Assessment.</p> <p>No suggested modifications</p>
Home Builders Federation	<p>Part G a and b is unsound because it is unjustified.</p> <p>The Council is seeking a 15 per cent improvement in biodiversity net gain (BNG) or two biodiversity credits per hectare. This is further than the statutory requirement of ten per cent. The Council argues in paragraph 7.3.5 that the policy has a minimum effect on viability, but as observed previously, the assessment only models the effect of this requirement in isolation from other policies like net zero carbon. It should do this in combination. Moreover, scrutiny of</p>	<p>It is considered that the evidence base is sufficient to justify the policy and its impact upon viability has been tested in the Whole Plan Viability Assessment. This assessment has considered the cumulative impact of policies.</p> <p>No suggested modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>the results of modelling 15 per cent, or two biodiversity credits per hectare, reveals problems with viability under many of the scenarios modelled. Non-viability is more common than viability.</p> <p>We recommend that the Council adheres to the statutory requirement.</p>	

Policy GI4 - Urban Greening, Landscaping and Trees

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	<p>We welcome insertion of the new paragraph supporting green infrastructure in kerbside space but suggest an addition as follows: ‘Kerbside space should be used for green infrastructure where it contributes positively to the public realm (in line with policy GR3) and is not required for active travel upgrades or public transport facilities.’</p>	<p>It is considered the suggested modification has merit as it reflects the exemption for active travel upgrades (as another form of sustainable transport).</p> <p>Suggested modification</p> <p>Amend paragraph 7.4.5 by adding the following at the end of the paragraph: ‘or public transport facilities.’</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>This policy emerges from policy London Plan policy which as it was adopted in 2021 predates the present by diversity net gain regulations. This policy is now redundant because of the national biodiversity net gain policy and the associated metric and Planning condition. These statutory provisions will secure the enhancement and measurements that is required and further planning policies are unnecessary to repeat this process. This policy should be deleted because it duplicates National policy.</p>	<p>Policy is consistent with national policy and the London Plan. Urban Greening Factor is different to biodiversity net gain so the London Plan provisions are not redundant. Landscaping serves different (but complementary) functions to biodiversity. Trees /TPOs whilst also having biodiversity value, also have amenity / drainage / climate change benefits.</p> <p>No proposed modifications</p>
Home Builders Federation	<p>The policy is unsound because it is ineffective.</p> <p>The policy should clarify that the Urban Greening Factor can contribute to meeting the biodiversity net gain target. This is currently unclear.</p>	<p>The representation is not considered to represent a matter of soundness; it is however considered that an amendment along the lines suggested is positive and should be included/</p> <p>Suggested modification</p> <p>Clarify that UGF can contribute to BNG with additional supporting text at paragraph 7.4.2</p> <p>The London Plan sets an Urban Greening Factor (UGF) requirement for major developments. The UGF provides a target for the value of green cover that development is expected to provide. The Council will adhere to the recommended UGF factors for major residential and commercial development as set by the London Plan and acknowledges that additional green cover has the potential to contribute towards bio-diversity net gain requirements. Existing green cover retained on site as part of a development proposal will count towards the target UGF score.</p>

Policy GI5 - Food Growing

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
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Greg Dowden / Broadgate Development Partners Ltd	Food growing assets is a new concept that does not appear in the NPPF or NPPG. It should be defined if it is to be a planning policy and currently it is not. This makes the policy inconsistent with national planning policy and uncertain. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Policy is considered to be sound. The NPPF includes several references to food / allotments, including within Chapter 8 Promoting healthy and safe communities. It is required by London Plan Policy G8 Food growing. No proposed modifications.
Greg Dowden / Broadgate Development Partners Ltd	Policy D is not possible to achieve. Food growing occupies the surface area of a site and sites cannot be developed without impacting on that surface area and resulting in the loss of land for growing food. The policy will prevent any change on sites where food growing occurs because it will result in a net loss of food growing area. This is likely to produce sub optimal outcomes for meeting identified need. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Policy is considered to be sound in the context of the NPPF, London Plan and the policy when read in its entirety. No proposed modifications.
Greg Dowden / Broadgate Development Partners Ltd	Policy A confuses food growing and opportunities for diversity, leisure social interaction and education. All matters apart from food growing are covered elsewhere in other policies and do not need to be duplicated in this policy which is redundant in consequence. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted	Policy is considered to be sound; this is reflected in the fact food is referenced in Chapter 8 Promoting healthy and safe communities of the NPPF i.e. the benefits of food growing are not just the projection of food. No proposed modifications.

Strategic Policy 8 – Responding to the Climate & Nature Emergency

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Carter Jonas for Barratt London	Strategic Policy 08 (Responding to the Climate and Nature Emergency) sets out all development in Harrow must implement sustainable development practices and positively manage natural capital. Sustainability and energy efficiency has always been placed at the heart of Eastman Village and the latter phases would uphold these principles and seek to continue with any relevant planning policy. We strongly agree with the Local Plan policies responding to the Climate and Nature Emergency.	Support noted. No proposed modifications.
Environment Agency	Section h(2) of this policy states “ <i>where possible avoiding or otherwise minimising light and noise pollution, and improving air, water and soil quality</i> ”. We suggest that “ <i>water</i> ” in this policy is specified, and recommend it be split into both groundwater and surface water. In this instance groundwater relates to both groundwater quality and quantity. Development should not place a burden on groundwater flow or quantity, as well as protect and enhance groundwater quality. This point is reflected in the Integrated Impact Assessment and was also provided as part of our Regulation 18 response, so it is disappointing to see that this hasn’t been included.	It is considered that water and soil quality cover this sufficiently. No proposed modifications.

Policy CN1 – Sustainable Design & Retrofitting

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Cater Jonas for Barratt London	Policy CN1 (Sustainable Design and Retrofitting) requires all new buildings to be designed and built to be Net Zero Carbon in operation. There is additional text within the Regulation	Noted.

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>19 Local Plan which requires all new buildings to minimise the use of mains water achieving a maximum consumption of 105 litres per head per day, excluding allowance of up to five litres for external water consumption. This is supported as it provides a clear requirement for new development to be assessed upon.</p> <p>Sustainability and energy efficiency has always been placed at the heart of Eastman Village and the latter phases would uphold these principles and seek to continue with any relevant planning policy. We strongly agree with the Local Plan policies responding to the Climate and Nature Emergency.</p>	<p>No proposed modifications.</p>
Planning Issues	<p>Policy CN1: Sustainable Design and Retrofitting and Policy CN2: Energy Infrastructure As noted above, the viability of housing for older people is noted to be less viable than mainstream housing. Proposed amendments to Policy HO6 above would ensure that the council might assess proposals for older persons housing on a site-by-site basis, applying a flexible approach to these requirements.</p>	<p>The Council considers that the policy is justified, having regard to the relevant evidence base, particularly the Delivering Net Zero Report 2023 and Plan-level Viability Assessment 2024. The offsetting mechanism is considered to provide flexibility with respect to site / proposal / technology specific considerations.</p> <p>No proposed modifications.</p>
Rolfe Judd obo Tesco Stores Ltd	<p>Draft Policy CN1.e (Offsetting) states: <i>'Offsetting will only be accepted as a means to achieving planning policy compliance as a last resort if the building is compliant with all other Net Zero Carbon building aspects. In these circumstances, the applicant should establish the shortfall in renewable energy generation to enable the annual renewable energy generation to match the Energy Use Intensity in kWh. The applicant should pay into the Council's offset fund a sum of money equivalent to the shortfall; this contribution will be secured by way of a planning obligation.'</i></p> <p>Measures are intended to incentivise the delivery of sustainable buildings in London, however the two options for the carbon offset fund based on Energy Use Intensity (EUI) and solar PV maximisation deviate from Part L of the Building Regulations and Strategic Policy including London Plan Policy SI 2 which sets the carbon offset price as £95 per tonne. For a policy to be considered sound it must be robustly tested and justified, taking into account the reasonable alternatives, and based on proportionate evidence as well as being consistent with national policy (NPPF para. 35).</p>	<p>The Policy is based on the approach set out in the Council's evidence base, namely the Delivering Net Zero Report (2023). The approach to offsetting is considered to be in general conformity with the London Plan in that carbon reductions should be maximised on-site (rather than offset) and that boroughs can set their own carbon offset price (which is calculated within the Delivering Net Zero Report 2023) and has been tested in the Plan-level Viability Assessment 2024.</p> <p>No proposed modifications.</p>
Home Builders Federation	<p>The policy is unsound because it is contrary to national policy. In requiring net zero carbon, reflecting the LETI doctrine, the Council is departing from the Building Regulations. This requirement to measure embodied carbon is contrary to the Government's policy.</p> <p>The last Housing Minister, Lee Rowley, in his statement to parliament on 13 December 2023 has clarified the Government's approach. As he wrote: <i>A further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes.</i> The Minister continued:</p>	<p>The Council considers that the policy is justified, having regard to the relevant evidence base, particularly the Delivering Net Zero Report 2023 and Plan-level Viability Assessment 2024. The offsetting mechanism is considered to provide flexibility with respect to site / proposal / technology specific considerations.</p> <p>No proposed modifications.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p><i>In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:</i></p> <ul style="list-style-type: none"> <i>• That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.</i> <i>• The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).</i> <p><i>Where plan policies go beyond current or planned building regulations, those policies should be applied flexibly to decisions on planning applications and appeals where the applicant can demonstrate that meeting the higher standards is not technically feasible, in relation to the availability of appropriate local energy infrastructure (for example adequate existing and planned grid connections) and access to adequate supply chains.</i></p> <p><i>To be sound, local plans must be consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, including this one.</i></p> <p><i>It is clear from this statement that Councils should not be setting standards for energy in homes that departs from the approach set out in the Future Homes Standard.</i></p> <p><i>In view of the significant under-performance in housing delivery across London as a whole compared to the London Plan target, this policy is also unjustified. The complexity of planning policies in London is a factor contributing to poor rates of delivery. We recommend that the Council deletes this policy and adheres to the Government's approved approach to deliver zero carbon homes through the Building Regulations.</i></p>	
Home Builders Federation	<p>Second, the viability assessment does indicate that the policy will cause issues for delivery – see tables 6.28.1 onwards to 6.28.2.</p> <p>In the supporting commentary in paragraph 6.28 we note:</p> <p><i>Scenario 1 applies a 3% cost uplift and Scenario 2 applies a 5% uplift. The residual land values for these two scenarios are summarised in Table 6.28.1 (Scenario 1) and Table 6.28.2 (Scenario 2). Table 6.28.3 provides a summary of the change in residual land values for schemes assuming a price point of £7,500 per square metre (the upper end of the Borough-wide range) which indicates that the reduction in residual land values is typically circa 20% for Scenario 1 and circa 33% for Scenario 2, but with higher reductions on larger schemes and some mixed use developments. Where schemes are on the margins of viability, and developers are unable to pass back the cost of NZC to landowners through a lower land price, it is possible that developers will seek to offset the additional cost by reducing the provision of affordable housing. However, the costs of achieving net zero carbon are expected to fall over time as technologies evolve and improve.</i></p> <p>The viability report, does, therefore, indicate how this policy will cause difficulties, and is likely only to work by reducing the affordable housing element. Moreover, as previously</p>	<p>The viability study notes circumstances where viability maybe impacted by the policy (i.e. where schemes are on the margins of viability' but does not identify any overarching viability issues with this policy requirement given likely falls in the costs of achieving zero carbon.</p> <p>No proposed modifications.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	discussed, the viability assessment models the effect of certain local plan policies in isolation, including biodiversity net gain, rather than cumulatively.	
Greg Dowden / Broadgate Development Partners Ltd	Policy B is not an example of one size fits all which will be to the detriment of future occupiers of buildings. Or flexibility is needed. There is no shortage of water as climate change means the country is generally becoming wetter. Where there is an issue is in poor water infrastructure. This is a function of the poor performance of water companies and the future development industry should not be made to Better cost for this historic lack of investment. The policy should be more flexible so that where houses are able to take advantage of grey water suds and water recycling techniques this should be offset against their water consumption which should be allowed to increase in proportion to the amount of recycled water households use. Recycling water will incentivising the recycling of water will significantly contribute to some objectives removing pressure on water infrastructure, and should be reported accordingly. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted	This representation is factually incorrect. The Environment Agency have classified the area served by Thames Water / Affinity Water as being a water stressed area. The policy is therefore justified. It is also necessary in order to be able to condition the requirement on planning permissions and therefore trigger the relevant optional requirements under Part G of the Building Regulations. No proposed modifications.
Greg Dowden / Broadgate Development Partners Ltd	The resilience in the housing stock and societal cohesion requires a diversity in the choice of energy supplies. Putting all eggs into one basket exacerbates the impacts of future shocks changes as the war in Ukraine has demonstrated. It is therefore risky to adopt a mono energy approach to new building. This policy will do this and will increase future exposure to future risk and unpredictable changes in energy markets. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	It is unclear how requiring more energy efficient development, and supporting investment in renewable energy will result in “mono energy approach”. Paragraph 8.1.12 suggests a preference for solar PV but notes other technologies maybe appropriate. No proposed modifications.
Greg Dowden / Broadgate Development Partners Ltd	Part E offsetting provides flexibility to help a very top heavy planning policy function efficiently. It should not be regarded as a last resort as it is a valid way of achieving the reductions the council seek and the route to which those reductions are achieved is immaterial if they are achieved. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Offsetting as the last resort in meeting net zero requirements is in line with the London Plan approach (Policy SI 2 Minimising greenhouse gas emissions and Figure 9.2). No proposed modifications.
Environment Agency	We're pleased with the changes made to this policy following recommendations from our previous response.	Noted. No proposed modifications.

Policy CN2 – Energy Infrastructure

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Avison Young obo National Grid	The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET. NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.	Noted. No proposed modifications.
Avison Young obo National Grid	NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.	Noted. No proposed modifications.

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
RAF Northolt	<p>The MOD note proposed draft Policy CN2: Energy Infrastructure- 8.2.10: Development proposals should maximise the amount of renewable and secondary energy generated on site. This includes the use of solar photovoltaics (PV), heat pumps and solar thermal, both on buildings and at a larger scale on appropriate sites. There is also potential for wind based renewable energy in some locations.</p> <p>The MOD has, in principle, no objection to any renewable energy development, though some infrastructure enabling renewable energy production, for example wind turbine generators or solar photo voltaic panels can, by virtue of their physical dimensions and properties, impact upon military aviation activities, cause obstruction to protected critical airspace surrounding military aerodromes, or impede the operation of safeguarded defence technical installations.</p> <p>Solar PV development can impact on the operation and capability of communications and other technical assets by introducing substantial areas of metal or sources of electromagnetic interference. Depending on the location of development, solar panels may also produce glint and glare which can affect aircrew or air traffic controllers.</p> <p>In addition, where turbines are erected in line of sight to defence radars and other types of defence technical installations, the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government’s online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of, or exceeding 2m.</p> <p>Additionally, it may be necessary in certain circumstances for MOD to require the removal of permitted development rights, where the use of these rights introduces elements that would not be compatible with MOD safeguarding requirements.</p>	<p>Noted but not considered to impact upon the policy as drafted nor does the representation suggest any potential modifications.</p> <p>No proposed modifications.</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Part A it is unreasonable to make owners and applicants provide a specific site specific assessment of the most effective and efficient energy supply options at the planning application stage. This is the very beginning of the process and while it might be reasonable to demonstrate that their scheme is capable of providing a variety of options, to have required the finished solution to have been derived at the planning application stage once is relied on so many detail design features is unbreakable and impractical.</p> <p>The policy is too loosely drawn to be effective and therefore should be re drafted to reflect this point or deleted.</p>	<p>The Council considers that it is appropriate that all new development considers energy supply options at the planning application stage, consistent with the London Plan and the Mayor’s Energy Assessment Guidance 2022. Energy options can influence the design of the scheme and therefore need to be considered from the outset.</p> <p>No proposed modifications.</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Part E is redundant and applies to circular logic. If a development proposal meets all other relevant aspects of this local plan then it will be acceptable in terms of those other policies. It does not require a further energy policy stating that the scheme will be acceptable. This policy should be removed to simplify the plan make it less complex and less and easier to use. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Part E of the policy specifically relates to standalone energy infrastructure not associated with a development for non-energy related uses (i.e. Parts A-D). The Council considers that this Policy is consistent with the NPPF as it provides positive support for such proposals.</p> <p>No proposed modifications.</p>

Policy CN3 – Reducing Flood Risk

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Thames Water	<p>In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".</p> <p>When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.</p> <p>In relation to Policy CN3 F in relation to Basements, Thames Water’s main concerns with regard to subterranean development are:</p> <p>1) The scale of urbanisation throughout London is impacting on the ability of rainwater to soak into the ground resulting in more rainfall in Thames Water’s sewerage network when it rains heavily. New development needs to be controlled to prevent an increase in surface water discharges into the sewerage network.</p> <p>2) By virtue of their low lying nature basements are vulnerable to many types of flooding and in particular sewer flooding. This can be from surcharging of larger trunk sewers but can also result from operational issues with smaller sewers such as blockages. Basements are generally below the level of the sewerage network and therefore the gravity system normally used to discharge waste above ground does not work. During periods of prolonged high rainfall or short duration very intense storms, the main sewers are unable to cope with the storm flows.</p> <p>As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water’s Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section</p> <p>Flood risk policies should also make reference to ‘sewer flooding’ and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.</p>	<p>Part F of the policy requires “resilience measures”, which could include pumps if necessary and appropriate.</p> <p>No proposed modifications.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>The policy should therefore require all new basements to be protected from sewer flooding through the installation of a suitable (positively) pumped device. Clearly this criterion of the policy will only apply when there is a waste outlet from the basement i.e. a basement that includes toilets, bathrooms, utility rooms etc. Applicants should show the location of the device on the drawings submitted with the planning application.</p>	
LB Brent	<p>We suggest adding the text in bold/italics to para 8.3.8: Harrow's Local Flood Risk Management Strategy (2016) outlines the priorities for local flood risk management, assesses risk, provides a delivery Action Plan, and identifies roles and responsibilities of authorities. <i>The London Surface Water Strategy seeks to increase London's resilience to surface water flooding. Harrow falls within the Brent and Harrow Stream Surface Water Catchment Partnership. The Strategy will facilitate collaboration across administrative boundaries and with multiple strategic partners, including securing funding for surface water management projects and maintenance more efficiently.</i></p>	<p>Noted and agreed, although reference to specific boroughs / sub-regional catchment partnerships may date quickly and not be comprehensive.</p> <p>Proposed Modification:</p> <p>Amend paragraph 8.3.8 by adding the following text to the end of the paragraph: <u>The London Surface Water Strategy seeks to increase London's resilience to surface water flooding. The Strategy will facilitate collaboration across administrative boundaries and with multiple strategic partners, including securing funding for surface water management projects and maintenance more efficiently.</u></p>
LB Brent	<p>We are aware that mitigation measures in Harrow could have a positive impact in terms of improving water quality and reducing flood risk in Brent.</p> <p>We suggest adding the text in bold/italics to para 8.3.10: Harrow will work <i>proactively with the London Borough of Brent within the context of the Brent and Harrow Stream Catchment Partnership and</i> with the West London LPA and Strategic Flood Group to adopt a catchment based approach to flood alleviation, <i>mitigating water pollution and improving water quality across the network of waterways</i>, and <i>to</i> the collection and use of developer contributions to fund mitigation measures.</p>	<p>Noted and agreed, although reference to specific boroughs / sub-regional catchment partnerships may date quickly and not be comprehensive.</p> <p>Proposed Modification:</p> <p>Amend paragraph 8.3.10 as follows: 'Harrow will <u>proactively work with the West London LPA and Strategic Flood Group and other partnerships</u> to adopt a catchment based approach to flood alleviation, <u>mitigating water pollution and improving water quality across the network of waterways</u> and <u>to the collection and use of developer contributions to fund mitigation measures.</u></p>
LB Barnet	<p>LB Barnet acknowledges that LB Harrow, in partnership with the North-West London Strategic Flood Group will work with providers to identify and undertake work to design and install strategic flood storage and attenuation drainage solutions (Para. 8.4.2).</p>	<p>Noted.</p> <p>No proposed modifications.</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>This policy should be deleted. It does nothing other than repeat existing planning policy in the NPPF and NPPG. If there is to be a policy at all it should simply say the council will apply flooding and flood policy set out in the NPPF. This would have the virtual being consistent with national policy.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>The Council considers that this policy is appropriate as it seeks apply the NPPF / NPPG in the Harrow context, including any Harrow specific requirements where these are allowed by the NPPF / NPPG. It also reflects the West London SFRA (Level 1) and the Harrow Level 2 SFRA.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Part F ignores the fact that basements can provide valuable areas for flood storage in the case of flooding events and so depending on the use of the basement, they can have a positive impact. A policy a blanket policy preventing any basement coming forward at all in flood zone 3B is ownerless and May prevent an optimal flood risk strategy from emerging.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Basements are not suitable for use as flood storage, particularly in high-risk areas. The extent of Flood Zone 3b in the borough is relatively modest, meaning the impact of restriction on basements will be modest.</p> <p>No proposed modifications.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden BDP	Policy G is vague and uncertain. If it means that if the proceeding provisions of the policy are not complied with in some form then planning permission will be refused, that is one thing but this policy points to an aspiration and warns that permission will be refused if that aspiration is not met. Without further detail or criteria this policy does not function as a planning policy.	Noted and agreed that as drafted, the policy is arguably inflexible with respect to this matter. Proposed modification: Amend Part G as follows: Natural flood management methods should be employed as the preferred approach in new development proposals.
Environment Agency	We're happy to see a change in wording from 'should' to 'must' in clause B(d) as previously recommended but are disappointed that no other changes have been made, especially as we have serious concerns regarding the 3b clauses within this policy (D, E, and supporting text 8.3.12). As stated previously, we believe this will cause confusion and implies that development is acceptable within 3b if it's already built upon, and this conflicts with national policy. Therefore, as this policy is not consistent with national policy , we find this policy unsound . These soundness concerns can be addressed by re-considering the policy wording to ensure: 1. No increase in the built footprint of any existing development within Flood Zone 3b. 2. No increase in the vulnerability classification of any existing development within Flood Zone 3b. Further details can be found in the Flood Risk and Coastal Change section of the Planning Practice Guidance.	Noted. Proposed modification: Add between CN3(B)(d) & (e): e. No increase in the built footprint of any existing development within Flood Zone 3b. f. No increase in the vulnerability classification of any existing development within Flood Zone 3b.

Policy CN4 – Sustainable Drainage

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Thames Water	With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer in accordance with the drainage hierarchy. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding. Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits. In this regard we support Policy CN4 Part A & C & D b.	Noted. No proposed modifications.
Greg Dowden / Broadgate Development Partners Ltd	Part B is unreasonable to require all development to achieve Greenfield run-off rates as a minimum. Many sites in Harrow will be developed already and therefore will not contribute to Greenfield run-off rates by virtue of being developed sites. Comparatively few Greenfield sites will come forward in Harrow where Greenfield run-off rates currently apply.	This requirement is considered to be justified by the Council's evidence base, particularly the West London SFRA (Level 1) and is considered appropriate given the urbanised nature of the borough where the greatest extent of flood risk is that related to surface water flooding.

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>It will be far more effective and beneficial to encourage Greenfield run-off rates to be achieved and reward schemes where this is done by incentivising them to do so, for instance through flexibility in other policy areas or indeed water consumption levels.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>No proposed modifications.</p>
<p>Greg Dowden / Broadgate Development Partners Ltd</p>	<p>It's unreasonable to require major developments to make provision for storage and passage of flood water if those sites do not lie within areas of flood risk. The affects of this policy will be to apply Flood Zone 2 and 3 flooding policies to all sites everywhere, which is unreasonable.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Ensuring that major developments do not worsen surrounding areas in terms of flood risk through safe storage and passage of flood water is an important requirement of the Plan's approach to managing flood risk. The policy as drafted cannot be reasonably interpreted as suggested by the representation</p> <p>No proposed modifications.</p>
<p>.Greg Dowden / Broadgate Development Partners Ltd</p>	<p>Part E of this Policy requires that applicants should make use of sustainable measures. This will leave applicants uncertain of what is required. Some applicants will be required to do so others will not and there will be problems of consistency in applying the policy which is unreasonable.</p>	<p>The nature of the developments to which this part applies means that the extent of measures will vary; this is reflected in the draft where such measures will be expected to be reasonable and feasible.</p> <p>No proposed modifications.</p>
<p>Greg Dowden / Broadgate Development Partners Ltd</p>	<p>F. The presumption against impermeable hardstanding is unreasonable on gardens and public space. The policy objective can be supported by offset. The impact of hardstanding can be off set against other flood relief measures, for instance it may be possible to have a hardstanding if the front garden incorporates a flood storage tank or if rainwater is harvested to reduce run-off rates. Incentivising behaviour is a far better way of achieving positive objectives than simple bands.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>It is important that the overall risk of surface water flooding is minimized by the appropriate design of permeable surfaces on all new development. It is not appropriate to rely on flood risk mitigation alone; the policy does however identify what is required if impermeable hardstanding is proposed.</p> <p>No proposed modifications.</p>
<p>Greg Dowden / Broadgate Development Partners Ltd</p>	<p>Part H is also very subjective. Appropriate best practice for the control of water pollution is a water industry specific body of knowledge. This is too vague to be used as a land used planning policy to enable it to effectively control and bring forward sustainable development.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>The policy is flexible such that as updated guidance is provided it can be referenced by decision takers.</p> <p>No proposed modifications.</p>
<p>Thames Water</p>	<p>In relation to Policy CN4 Part B, although we are not the water undertaker for Harrow, we support water efficiency measures.</p> <p>The Environment Agency has designated the Thames Water region to be an area of "serious water stress" which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change. On average our customers each use 30% more water than they did 30 years ago. Therefore water efficiency measures employed in new development are an important tool to help us sustain water supplies for the long term.</p> <p>Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the enhanced mains water</p>	<p>Noted.</p> <p>No proposed modifications.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>consumption target of 100 litres per head per day and support the inclusion of this requirement in Policy.</p> <p>Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on our website via the following link: https://www.thameswater.co.uk/Be-water-smart</p> <p>It is our understanding that the enhanced water efficiency standards of 110 litres per person per day referred to in the NPPG is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.</p> <p>Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.</p>	
Thames Water	<p>Wastewater/Sewerage infrastructure – Policy Omission</p> <p>Thames Water are the statutory sewerage undertaker for Harrow, but not the water supply undertaker.</p> <p>We support the references to our Drainage and Wastewater Management Plan at paragraph 8.4.6, but consider that there needs to be a separate policy covering wastewater/sewerage [and water supply] infrastructure.</p> <p>Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater [and water supply] treatment infrastructure.</p> <p>Both water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2023, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”</p>	<p>It is noted that utility providers have the responsibility of ensuring all new development is connected to the water and wastewater networks. The Local Plan sets out the level of development expected within the borough and the Council’s five-year housing supply provides regularly updated short-to-medium term details of housing supply in the borough to assist infrastructure providers plan for infrastructure.</p> <p>Paragraph 8.4.6 references Thames Water’s requirements.</p> <p>The Council will continue to work with suppliers and other stakeholders as necessary to deliver new and upgraded infrastructure within the borough.</p> <p>Any specific impact of a proposal on infrastructure will be considered in accordance with Policy GR11 Planning Obligations.</p> <p>No proposed modifications.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>Paragraph 11 states: <i>“Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:</i> <i>a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”</i></p> <p>Paragraph 28 relates to non-strategic policies and states: <i>“Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”</i></p> <p>Paragraph 26 of the revised NPPF goes on to state: <i>“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary...”</i></p> <p>The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that <i>“Adequate water and wastewater infrastructure is needed to support sustainable development”</i> (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.</p> <p>The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.</p> <p>As from 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.</p> <p>Information on how off site network reinforcement is funded can be found here https://developers.thameswater.co.uk/New-connection-charging</p>	

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	<p>Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:</p> <ul style="list-style-type: none"> • The developments demand for water supply and network infrastructure both on and off site; • The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and • The surface water drainage requirements and flood risk of the development both on and off site and can it be met. <p>Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s free pre planning service are available at: https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</p> <p>In light of the above comments and Government guidance we consider that the New Local Plan should include a specific policy on the key issue of the provision of both water and sewerage/wastewater infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Local Plan include the following policy:</p> <p>PROPOSED WATER SUPPLY/WASTEWATER INFRASTRUCTURE POLICY TEXT: <i>“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</i></p> <p><i>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”</i></p>	
Thames Water	<p>Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in AMP7 which covers the period from 1st April 2020 to 31st March 2025. AMP8 will cover the period from 1st April 2025 to 31st March 2030. The Price Review, whereby the water companies’ AMP8 Business Plan will be agreed with Ofwat during 2024.</p> <p>Hence, a further text should be added to Policy as follows:</p>	<p>The Council will continue to work with suppliers and other stakeholders as necessary to deliver new and upgraded infrastructure. Where appropriate and information is available, these projects will be identified in the IDP.</p> <p>No proposed modifications.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p><i>“The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact or that any such adverse impact is minimised.”</i></p>	
Environment Agency	<p>We’re pleased to see the strengthening of clause B through the replacement of ‘should’ to ‘must’, however, we have some new concerns with this policy due to the addition of supporting text 8.4.11, 8.4.12, and as there is still a lack of a contamination/groundwater protection policy.</p> <p>Groundwater land contamination</p> <p>Clause H should clarify what is meant by “control of water pollution”. Furthermore, “<i>major development</i>” should be changed to “<i>all development</i>”. This is the same as 8.4.12. For clause H we suggest it be reworded to, “<i>Proposals for any development should ensure best practice is followed to ensure groundwater resources are not negatively impacted.</i>”</p> <p>The protection of groundwater quality from SuDS is not included as a part of this policy, and an update should be made to incorporate this. For example, “<i>Proposals must prevent discharges to ground through land affected by contamination</i>” is some wording that can be used.</p>	<p>Noted and agreed.</p> <p>Proposed Modifications:</p> <p>Amend Part H as follows: to read: ‘Proposals for major <u>all</u> development should ensure appropriate best practice is followed with respect to the <u>control of water pollution to ensure groundwater resources are not negatively impacted. Where SuDS are proposed, these must prevent discharges to ground through land affected by contamination</u>’</p>
Environment Agency	<p>Discharges to groundwater</p> <p>We encourage the use of infiltration SUDs as this is a sustainable approach to surface water management that mimics natural processes. However, the use of infiltration SUDs is not appropriate on all sites and in all locations. Infiltration SUDs should not be constructed in contaminated ground and should not be used where infiltration can re-mobilise contaminants already within soils to pollute groundwater. Where peak seasonal groundwater levels are shallow this may constrain the potential for infiltration drainage or the choice of infiltration SUDs due to a requirement to maintain a minimum unsaturated zone thickness beneath the infiltration level. The use of deep infiltration systems such as boreholes is not routinely acceptable and will only be approved where there are no other feasible disposal options such as shallow infiltration systems or drainage fields/mounds and where the developer demonstrates no unacceptable pollution risk to groundwater; if approved they may require an environmental permit. In all cases the SUDs train should provide sufficient water quality treatment in line with the land use of the drainage catchment and sensitivity of the receiving groundwater body.</p> <p>We recommend that the following guidance be referenced:</p> <ul style="list-style-type: none"> • The Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13; • The CIRIA C753 SUDS Manual; • The Susdrain website; • The Sustainable Drainage Systems: Non-Statutory Technical Standards guidance on gov.uk and the Recommendations To Update these. 	<p>Noted and agreed. The CIRIA C753 SUDS Manual is already referred to in paragraph 8.4.12.</p> <p>Proposed Modification:</p> <p>Add to the end of paragraph 8.4.12, the following: <u>and The Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13; The Susdrain website; and the Sustainable Drainage Systems: Non-Statutory Technical Standards guidance on gov.uk and the Recommendations to Update these</u>’.</p>
CPRE	<p>Strong policies are needed to promote management of rainwater on site of new development, taking rainwater from roofs into ponds or wetlands or for grey water recycling for household use; and via changes to existing buildings, for example by requiring SUDS planters, water butts, dual aspect buildings (to promote through draught), appropriate insulation, shared / sustainable energy etc.</p>	<p>Noted.</p> <p>No proposed modifications.</p>

Policy CN5 – Waterway Management

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	Policy B is arbitrary in flexible and unrealistic. The 8 m buffer zone to this policy is an arbitrary target that is not explained or justified. It may bring schemes into conflict with the character of an area or result in sites not optimising their development potential. It will bring schemes into conflict with other parts of this plan and the London Plan. If there is a need for this requirement to exist by virtue of some other piece of legislation then this matter is already controlled and does not need to be dealt with in a local plan further. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted	The 8m buffer zone is in accordance with the Environment Agency’s standing advice. No proposed modifications.
Greg Dowden / Broadgate Development Partners Ltd	Part C contains two sub-part E’s	Noted. Proposed Modification: In Policy CN5, amend the first (E) to (a) and renumber a and b to b and c respectively.
Greg Dowden / Broadgate Development Partners Ltd	It is also unreasonable that schemes on a site containing a major river or water course which may not involve any changes at all to that feature, being forced to make improvements to that feature. This will just make their applications more complex than they would wish by making alterations to the water course that will involve greater complexity and scrutiny from other bodies. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	The policy is appropriately caveated with “where feasible”. No proposed modifications.
Greg Dowden / Broadgate Development Partners Ltd	Part D implies that financial viability appraisals will be required to assess whether improvements and enhancements to water courses can be achieved. Affordable housing shows that LPA’s have very little capacity to process information relating to ability and that it is extremely slow and difficult to do so. There is no policy basis for introducing viability appraisals for Improvements to water courses and this should be draft policy should be deleted. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Viability appraisals will incorporate all relevant cost inputs of a development proposal, not just affordable housing. The approach of the policy is akin to offsetting, where the requirements of Part C cannot be met on-site but it is viable for the development to make a monetary contribution to secure watercourse improvements elsewhere. No proposed modifications.
Greg Dowden / Broadgate Development Partners Ltd	Part E places a positive obligation on every applicant to make enhancements to water courses that may run through the land whether they wish to or not, or whether there scheme impacts the water course a lot. It is not clear who will propose the enhancements presumably the Environment Agency and the positive obligation to make the enhancements or have planning permission refused is unreasonable. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	The Council will work with applicants and other relevant stakeholders to identify improvements on site as part of the design and application processes, and to deliver these. No proposed modifications.
Environment Agency	We are supportive of the recommended changes being made to this policy including specifics oof an 8m buffer zone from the top of the bank/flood defence/culvert. However, we believe more could be said about blue infrastructure given that in supporting text 7.0.6 it explained that it would be discussed further in this chapter and still not enough has been mentioned. Blue Infrastructure.	Noted and agreed that elaboration on blue infrastructure within the supporting text would be beneficial. Proposed Modification:

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	<p>We highly recommend including text that covers blue infrastructure. This could be incorporated by amending the same policy or by including a separate policy for blue infrastructure. Such a policy should include the following provisions:</p> <ul style="list-style-type: none"> • Reconnection to the river corridor • Protection of defences and raising plans (within a riverside strategy) • Include provision for any culverted main rivers - are there any you would consider daylighting/ creating a restoration scheme. • Securing floodplain compensation - and utilising plans for compensation that provide wetlands and biodiversity gain. 	<p>Amend paragraph 8.5.3 by adding the following to the end: ‘In recognition of the important role waterways / blue infrastructure plays, the policy facilitates enhancements that could include reconnection of sites to waterways / corridors, deculverting / daylighting / restoration schemes, securing floodplain compensation - and utilising plans for compensation that provide wetlands and biodiversity gain.’</p>
Environment Agency	<p>Advice</p> <p>The Environment Agency has power over and responsibilities for watercourse management, including working on main rivers and managing flood risk. Therefore, new developments should not restrict access to main rivers and flood defence assets. As a minimum, we will be looking for an 8m undeveloped buffer zone to facilitate this access.</p> <p>Flood Risk Activity Permits are required for certain activities as outlined here: Flood risk activities: environmental permits - GOV.UK (www.gov.uk)</p> <p>The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:</p> <ul style="list-style-type: none"> • on or within 8 metres of a main river (16 metres if tidal) • on or within 8 metres of a flood defence structure or culvert (16 metres if tidal) • on or within 16 metres of a sea defence • involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert • in a floodplain more than 8 metres from the riverbank, culvert or flood defence structure (16 metres if it’s a tidal main river) and you don’t already have planning permission. 	<p>Noted.</p> <p>No proposed modifications.</p>
Environment Agency	<p>Groundwater and land quality issues</p> <p>We are deeply concerned that there is still no reference to groundwater and land quality issues. This is extremely disappointing as the Soil, Water and Minerals section of the IIA contains a number of key messages pertaining to the protection of groundwater and land quality from development works. The Reg 19 draft Local Plan as presented is not fit for purpose with respect to the protection of groundwater.</p> <p>Therefore, as this Local Plan is not positively prepared, or consistent with national policy, we find this draft Local Plan unsound.</p> <p>In order to overcome the above soundness concerns, we encourage London Borough of Harrow to draft a policy regarding the above. Please see the advice below:</p> <ul style="list-style-type: none"> • Specific National Planning Policy Framework (NPPF) paragraphs 180 and • Relevant guidance such the Environment Agency’s Approach to Groundwater Protection and Land Contamination Risk Management (LCRM) should be promoted • Policies should require developers to submit a Preliminary Risk Assessment (PRA) together with a planning application where land is potentially contaminated, in line with the NPPF. • Policies should require developers to ensure sites are suitable or made suitable for intended use, in line with the NPPF. 	<p>Noted.</p> <p>Proposed Modification:</p> <p>Add to Policy SP08:</p> <p>Groundwater and land quality</p> <p><u>i. Planning policies and decisions should ensure that:</u></p> <p><u>1. a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);</u></p> <p><u>2. after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and</u></p> <p><u>3. adequate site investigation information, prepared by a competent person, is available to inform these assessments.</u></p> <p>Add Supporting Text:</p> <p><u>8.0.10 Planning applications should be accompanied by a Preliminary Risk Assessment (PRA) together with a planning application where land is</u></p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<ul style="list-style-type: none"> Policies should require developers to prevent discharges to ground through land affected by contamination. <p>It should be ensured that any preliminary risk assessment and subsequent site investigation and remediation strategies at sites with land affected by contamination should be undertaken by a competent person. The National Planning Policy Framework (NPPF) paragraph 189c) defines a competent person (to prepare site investigation): “A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation”. We recommend including information on this in the supporting text of any proposed policy on groundwater and land quality.</p> <p>Piling or any other foundation design using penetrative methods may cause preferential pathways for contaminants to migrate to groundwater and cause pollution. For new development sites where piled / deep foundations penetrate the London Clay to the underlying aquifers then a Foundation Works Risk Assessment (FWRA) would be required to ensure that there are no arising unacceptable risks to groundwater in the chalk aquifer associated with the works.</p>	<p>potentially contaminated. NPPF paragraph 189c) defines a competent person (to prepare site investigation): “A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation”.</p>

Strategic Policy 9 – Managing Waste & the Circular Economy

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Mayor of London	<p>The West London Waste Plan (WLWP) was adopted by the West London Waste Planning Group of boroughs, of which LBH is a part, in 2015. As such, the waste plan is considered to be out-of-date. Strategic Policy 09 of the draft Plan is therefore reliant on an out-of-date waste strategy as it was based on the apportionments set out in the 2011 version of the London Plan. For this reason, the draft Local Plan does not adequately demonstrate LBH’s ability to meet its waste apportionment targets for household, commercial and industrial waste as set out in Table 9.2 of the LP2021.</p> <p>It is noted that a review of the WLWP is underway but is at the very earliest stages of preparation. As such, the Mayor advises that, as a minimum, Policy 09 of the draft Plan should seek to clearly protect existing waste sites until the joint waste plan is completed, at which point it will form part of LBH’s Development Plan and will set out the strategic approach for the sustainable management of waste in accordance with the LP2021.</p>	<p>Existing waste allocations are safeguarded by part A(d) of this policy as the West London Waste Plan seeks to safeguard identified existing waste sites in the borough and this element of the Plan cannot be considered out-of-date by virtue of any inconsistency with the subsequently adopted London Plan.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>It is unreasonable and enormous to require major developments to provide detailed information about waste management at all stages of a project’s life at the planning application stage. That can only be calculated once the detailed design of scheme is known. While a statement of broad principles may be acceptable at the Planning Application stage everything else should be dealt with as a condition post planning. The policy does not make this clear and is inconsequence ownerless and unreasonable.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>The Council considers that it is appropriate that developers consider waste management as a design issue at the planning application stage. This is considered to be in general conformity with the London Plan and the waste hierarchy in the supporting text.</p> <p>No proposed modifications</p>

Policy CE1 – Reducing and managing waste

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	<p>This policy has 16 parts and only deals with refuse management. For planning purposes this is too complicated at local plan level.</p> <p>Criteria A to D of policy A should be deleted. They are too detailed for a local plan policy yet at the same time are vague and don't set proper standards. Refuse is a matter best dealt with in an SPD or an Appendix to a local plan and therefore the information requirements of criteria A to D are both too detailed and not detailed enough at the same time.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>The Council considers these policy requirements appropriately link other regional and sub-regional principles at the local level. They provide the necessary policy hooks for more detailed guidance.</p> <p>No proposed modifications</p>

Policy CE2 – Design to Support the Circular Economy

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	<p>This policy is should be deleted as it duplicates policy CE 1B. This requires a circular economy statement to be produced for wage development and this will set out the principles and methods by which proposals will achieve circular economy principles and waste reductions. Therefore all the matters covered in CE2 are already covered in CE 1 B and there all this whole policy can be deleted as it simply duplicates a previous policy as well as London plan policy SI7 causing unnecessary complexity and uncertainty.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Noted and agreed, however it is considered that Policy CE2 provides additional detail compared to Part B of Policy CE1 and if any text is to be deleted, it should be Part B of Policy CE1.</p> <p>Proposed modification</p> <p>Delete Part B of Policy CE1: Reducing and Managing Waste and renumber C and D to B and C respectively.</p>

Strategic Policy 10 – Transport & Movement

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
HARROW CIVIC RESIDENTS ASSOC.	<p>Although the plan says that there will be infrastructure improvements there is no scope for meaningful road improvements for the two main routes through the opportunity area being Station Road and Harrow View. Increased massing of housing will cause increased congestion and pollution (whether residents own vehicles, deliveries, rubbish collection etc) in a small area where there is the intention to add 7500 new homes. The council's own Harrow and Wealdstone Area Action Plan states that Station Road is <i>'owing to this heavy usage, it is often congested resulting in an uncomfortable environment'</i> and <i>'there is limited opportunity to increase car traffic capacity.'</i></p> <p>Although the 'Opportunity Area' is served by Harrow on the Hill and Harrow and Wealdstone Station the increased population will stress on these two stations. If there was a borough wide approach of new housing stress and pressure would not be placed on two busy stations and commuters would have a variety of train lines for commuting into and out of central London.</p>	<p>It is noted that there is existing congestion at peak times on some routes within the borough. It is also noted that there are limited opportunities to increase the capacity of the local road network. Where there are local improvements that can be made these will be identified in the Infrastructure Delivery Plan.</p> <p>The spatial strategy, including the level of development envisaged within the Opportunity Area, has been informed by the London Plan, specifically Policy T1 Strategic approach to transport. That policy requires the Local Plan to contribute to the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041. In outer London, this translates into an increase in the share of trips made by walking, cycling and public transport from 60% to 75% by 2041. Therefore, whilst the Local Plan envisages an increase in housing in the borough (consistent with the London Plan), the Mayor seeks that the overall proportion of trips made by private vehicle decreases.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>The Council considers that the improved, and improving frequency and capacity of public transport services within the Opportunity Area mean that it is the most appropriate location to accommodate additional growth within the borough over the Plan period in order to contribute to the Mayor’s modal shift targets as required by the London Plan.</p> <p>No proposed modifications</p>
Peter Taylor	<p>This Policy does not seem to address the information proved in the Harrow Economic Needs Study Town Centres and Office Update Final Report London Borough of Harrow 15 January 2024. The concentration of planned housing development in the Opportunity Area, bringing an even higher population density to these areas on top the present enlarged population due to recent developments with only a wish list of plans to support the transport needs of this population is a huge miscalculation.</p> <p>The Opportunity area network of roads cannot support the demands being placed on it. The roads are often single lane and must take buses, private cars, delivery vehicles and emergency vehicles. Any slight problem on the roads has an immediate impact that extends widely. The impact on adjacent areas is also detrimental. The Council is currently consulting on implementing parking controls on areas close to recent housing developments as the car free agenda fails for these developments, and new residents bring their cars and park as conveniently as possible to their new homes, but not on the development where is parking is strictly controlled by private parking enforcement contractors.</p>	<p>It is noted that there is existing congestion at peak times on some routes within the borough. It is also noted that there are limited opportunities to increase the capacity of the local road network. Where there are local improvements that can be made these will be identified in the Infrastructure Delivery Plan.</p> <p>The spatial strategy, including the level of development envisaged within the Opportunity Area, has been informed by the London Plan, specifically Policy T1 Strategic approach to transport. That policy requires the Local Plan to contribute to the Mayor’s strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041. In outer London, this translates into an increase in the share of trips made by walking, cycling and public transport from 60% to 75% by 2041. Therefore, whilst the Local Plan envisages an increase in housing in the borough (consistent with the London Plan), the Mayor seeks that the overall proportion of trips made by private vehicle decreases.</p> <p>The Council considers that the improved, and improving frequency and capacity of public transport services within the Opportunity Area mean that it is the most appropriate location to accommodate additional growth within the borough over the Plan period in order to contribute to the Mayor’s modal shift targets as required by the London Plan.</p> <p>No proposed modifications</p>
Peter Taylor	<p>The London Borough of Harrow Infrastructure Delivery Plan (IDP) October 2024 also seems to be indicating that there are electricity capacity issues with electricity supply for forecast increase in Electric Vehicles (and new developments). Transport is given a Green rating in the document but Energy and Utilities has an Amber rating.</p>	<p>The two issues (transport and energy) are distinct in the IDP.</p> <p>Energy supply constraints are largely managed by service providers. The Council will work with relevant stakeholders to ensure enhancements to infrastructure are delivered when and where needed. These projects will be set out in the IDP.</p> <p>No proposed modifications</p>
TfL	<p>Although it is not included within the Policy, we welcome the addition to paragraph 10.0.3 which states that ‘The Council will work with TfL to identify additional targets for future iterations of the Mayor’s Transport Strategy.’</p>	<p>Noted.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	We also welcome the addition of paragraph 10.0.4 which includes reference to the Healthy Streets Data Park produced by TfL which shows that Harrow is on track to meet 2041 commitments. We would welcome further discussions to identify additional targets in advance of the next Mayor's Transport Strategy.	
TfL	We note that no change has been made in line with our regulation 18 representation and so we reiterate our request for Strategic Policy 10 to include support for car free development in well-connected locations and delivering car-lite development elsewhere as one of the proposed measures to ensure consistency with London Plan Policy T6.	The Council consider that this matter is adequately addressed in Policy M2. No proposed modifications
TfL	We also strongly encourage you to set out the proposed transport improvements which will support the delivery of the Local Plan, including a map of existing and proposed walking, cycling and public transport improvements.	This map is not currently available for publication alongside the Plan. No proposed modifications
TfL	Part A - We welcome the addition to part A so that it now reads: 'Development proposals must facilitate improvements to transport infrastructure through active travel, and the public transport network to deliver safe, accessible, inclusive, healthy, walkable and sustainable neighbourhoods, <u>and mitigate their transport impacts through planning obligations.</u> '	Noted. No proposed modifications
TfL	Part B - We welcome the addition to part B so that it now reads: 'Development must make effective use of land, improving its connectivity and accessibility to existing and future public transport, walking and cycling routes, <u>complying with London Plan parking standards to reduce the land take needed for carparking</u> and mitigating any adverse impacts on London's transport networks and supporting infrastructure.'	Noted. No proposed modifications
TfL	Part C - We welcome the additions to part C so that it now reads 'The Council will seek to improve access to public transport, <u>including the provision of fully accessible step-free station links</u> , particularly in areas of deprivation and for people with a disability, by working with Transport for London (TfL) to promote and improve public transport infrastructure, <u>capacity where needed to support development</u> and all abilities access.	Noted. No proposed modifications
TfL	Part E - We support the addition to part E although we suggest a further amendment to address the point about day and night time travel as follows: 'The Council will seek to encourage and enable people to choose active transport for day and night time travel by improving walking and cycling infrastructure across the borough. Improvements to road safety will be made to facilitate this <u>in line with the Mayor's Vision Zero objective.</u>	Noted. Whilst not considered necessary, the proposed amendment would complement the suggested amendment to Part D of Policy LE2 – Night-Time & Evening Economy. Proposed modification Amend Part E as follows: The Council will seek to encourage and enable people to choose active transport for day and night time travel by improving walking and cycling infrastructure across the borough. Improvements to road safety will be made to facilitate this in line with the Mayor's Vision Zero objective
National Highways	We are generally supportive of the principles of this policy that concentrates on alternative modes to the highway network, facilitating movement by public transport and active travel rather than private vehicle use.	Noted. No proposed modifications

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>This policy aligns with national policy requirements for sustainable transport and development focusing on walking and wheeling priorities through public and active travel transport networks. This includes improvements to accessibility and sustainable travel for all Harrow residents alongside increased car parking control measures across the borough for new development in conformity with the London Plan parking standards. New development will be required to demonstrate sustainable goals and incorporate measures to increase walking and wheeling.</p> <p>The Council will aim to increase accessibility to public transport through infrastructure improvements at stations for all abilities access.</p> <p>The policy further adds promotion of electric vehicles and charging facilities where vehicle travel is required, aiding the goal of net zero across the SRN.</p> <p>The measures and goals are likely to form a solid foundation on which to build a sustainable future for new development within the Local Plan. There is a framework for a future vision, further identified within the sustainable elements of the Infrastructure Delivery Plan.</p>	
Greg Dowden / Broadgate Development Partners Ltd	<p>This policy is based around the concept of active travel which is clearly a technical term that has a definition. However, this term is explained neither in the policy or in the glossary to the local plan. It is unreasonable to have a policy whose key concept has not been fully explained. The rest of the policy cannot be understood in relation to this gap, and consequently makes little sense.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty.</p> <p>In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>The supporting text could expand on what is meant by active travel.</p> <p>Proposed modification</p> <p>Amend paragraph 10.0.2 by adding the following at the end: <u>Active travel refers to modes of travel that involve a level of activity. The term is often used interchangeably with walking and cycling, but active travel can also include trips made by wheelchair, mobility scooters, adapted cycles, e-cycles, scooters, as well as cycle sharing schemes.</u></p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Part A it is unreasonable to require all development proposals to produce improvements. Development which maintains current parking highway and safety standards will be acceptable and it is unreasonable to require them to provide additional improvements on top of this.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted.</p> <p>The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>It is considered appropriate, that as a minimum, any development promotes at least an improvement to the walking environment. It also reflects the requirements of the London Plan, such as Policy T2 Healthy Streets.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Part B making most effective use of land is an objective of London Plan policy and is to be achieved. Excessive parking standards that take up significant areas within schemes will prevent optimal use of land being made.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted.</p> <p>The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>The policy applies the London Plan's (maximum) parking standards.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate	<p>Part C is not justified. While making or providing for fully accessible step free station links is to be applauded, it is not clear why this is especially the case in areas of deprivation. In such areas the bar</p>	<p>Excellent access to public transport should be provided in all areas.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Development Partners Ltd	to accessible transport use is income and price, not the presence of step free access. This policy is inconsistent and not properly thought through and so not justified. The Policy is therefore unlikely to be effective because of the lack of justification. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	
Greg Dowden / Broadgate Development Partners Ltd	The transition to electric vehicles is slowing down and stalling for reasons of cost, perception and international competition between suppliers. The Policy should not exist at the expense of fossil fuel vehicles which will provide diversity of supply and choice. These will now last longer than was previously anticipated and their attention should be catered for in This policy, not assumed that they will all be replaced in the near future. It does not reflect the actual reality and it is in danger of being rapidly out of date and therefore ineffective. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Part G sets a positive framework for the transition to electric vehicles through infrastructure provision and is considered to reflect the requirements of the London Plan (Chapter 10). The Local Plan is a 20-year plan and there is a clear policy move towards electric vehicles notwithstanding any short-term considerations. No proposed modifications

Policy M1 – Sustainable Transport

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Chandrakar Shah	Council have closed entry and exit to slip road off honeypot lane to go to Malvern gardens and Glebe Avenue. There is only one entry and exit entrance. Why can't you the council have two excess points to the slip road off honeypot. One entry and other exit points rather than one excess for both exit and entry.	This is outside the scope of the Plan. No proposed modifications
Donal Grey	There is no mention of improving transport connections around London from Harrow and Wealdstone station. When the area was designated an opportunity area there were promises of Crossrail stopping at H&W and everything was very optimistic. Trains going to Euston are packed during rush hour and people often cannot get on - these need to be more frequent. There is still only 1 train per hour to Clapham / west London. There seems to be no thought around improving Harrows links to massive development opportunities in Old Oak Common...despite a train line from H&W almost going through the new HS2 station. The connectivity potential of H&W seems to be recognised but this section of the plan appears to have had very limited thought / ideas / energy.	The Opportunity Area is a designation under the London Plan and is informed by the Mayor's Transport Strategy. TfL planning as well as that of the Council is informed by the level of development envisaged in the area. Any specific projects around Harrow and Wealdstone station will be identified in the Infrastructure Delivery Plan. The frequency of fast trains from the station into Euston has been increased from 30 minutes when the Opportunity Area was first identified, to 15 minutes. The opportunity area will also indirectly benefit from the proposed West London Orbital, which will significantly improve radial routes in West London. No proposed modifications
TfL	Although we welcome the strong focus on walking and cycling, there is very little about public transport in this policy or elsewhere in the local plan. We reiterate our regulation 18 representation that the local plan should set out requirements for safeguarding land for new transport projects as well as the protection and enhancement of existing transport infrastructure. In addition to active travel routes, this should include bus stations, stands, stops and driver facilities, bus garages, and rail and Underground stations and infrastructure. This is necessary for soundness and to ensure consistency with London Plan Policy T3.	There are no proposed assets that require safeguarding at the current time. No proposed modifications
TfL	We note that the addition of 'mitigate their transport impacts through planning obligations' to Strategic Policy 10 part A partially addresses the point about transport contributions and that this is supported by the additional text added to paragraph 2.11.4 (see comments above).	Noted. No proposed modifications

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	We reiterate our regulation 18 representation about the need for a map of existing and proposed walking and cycling routes. The addition of paragraph 10.1.4 is helpful in setting out a number of active travel projects but in line with the Sustainable Transport, Walking and Cycling LPG these should be illustrated on a map of the existing networks that also identifies gaps in provision or areas for improvement. We note that amended paragraph 2.11.4 refers to the funding of measures identified through an Active Travel Zone Assessment but a requirement for day and night-time Active Travel Zone Assessments should be included in Policy M1 to ensure soundness.	This map is not currently available for publication alongside the Plan. No proposed modifications
LB Barnet	The Harrow Local Plan – Regulation 19 as a whole is very light on public transport and would benefit from a single policy that sets out Harrow’s priorities and a commitment to work with neighbouring authorities to deliver on them. This is particularly important given their aspirations for development at some locations that would require additional services to make them sustainable – for instance any substantial employment uses at the Royal National Orthopaedic Hospital (currently PTAL 1b at the most favourable location). As raised before, it would be helpful if the reasoned justification for this policy (para 10.0.8) highlighted potential enhancements of the public transport network to support delivery of the Plan.	Policies SP10 and M1 both include support for development that will improve public transport access. No proposed modifications
LB Barnet	As per LB Barnet’s comments at Regulation 18 stage, <i>Policy M1: Sustainable Transport</i> of LB Harrow’s Regulation 19 Local Plan should specify, where applicable, what elements of the policy require cross-boundary working with neighbouring boroughs, particularly where there are references to ‘strategic’ and ‘local’ networks	This is considered to be unnecessarily detail in the Policy. The Council will continue to work with neighbouring boroughs on local and strategic transport matters where appropriate. No proposed modifications
National Highways	<p>This policy includes the requirements for developments in contributing towards sustainable transport. This includes enhancement of cycle and pedestrian connections, and other forms of sustainable travel, to local destinations, schools and amenities, providing accessible, secure, and convenient cycle parking for all users, contributions towards publicly accessible cycle parking. Additionally major developments must demonstrate that they have supported mode shift away from private vehicles. Transport Assessments need to demonstrate that the development will not have a negative impact on safety, cause congestion or lead to illegal or additional parking near the site of the proposed development.</p> <p>The policy aligns with Circular 01/2022 requirements to manage down vehicular demand, before consideration is given to residual demand on the highway. The Local Plan will ensure that planning decisions support investment in the transport infrastructure identified.</p>	Noted. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	<p>Part A if sustainable neighbourhoods are a key component of the policy and therefore they should be defined. They are not either in this policy, or in the glossary. This makes the mandatory nature of the policy unclear and therefore it will be ineffective</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	Sustainability, in terms of this policy, is defined in the second half of this sentence. No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	C is unclear and likely to be irrelevant to the majority of development sites. If a site is publicly accessible, it will almost certainly be on a highway which will lie outside of sites in private ownership. The number of times this policy will be engaged will be very minor and in any event the LPA has the ability to control this through its ownership of the highway network within the Borough. This policy is of such limited application that its presence simply confuses and makes the plan unnecessarily long and	Securing new, and improving existing connections across site is considered to be an important feature that should be secured in new developments. Provision considered necessary for where these circumstances described exist, even if these may be in the minority. Public rights of way exist on private land.

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	difficult to use The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	Part C is unreasonable. The circumstances when a contribution will be required should be set out in this policy. There is a danger that on-site parking cycle parking provision will be provided and yet a contribution sought for additional public accessible cycle parking. This will be unreasonable as the application would have supported its own cycle parking need. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	
Greg Dowden / Broadgate Development Partners Ltd	Part H cycle parking and its paraphernalia occupied significant areas of development. Cycle parking standards promote an inefficient use of land as they require too much space to be given over to bicycles. Smaller more compact forms a cycle provision should be adopted by the LPA to enable their objectives to be achieved in a way that optimises the development potential of sites which doesn't lose too much space to cycle parking. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.	The space required to provide for appropriate levels of cycle infrastructure will be considered at the planning application stage. Cycle parking provision needs to be in accordance with the London Plan (see Table 10.2). No proposed modifications

Policy M2 - Parking

Some responses to this policy have become conflated with the Kenton West CPZ consultation that was held concurrently.

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Dharmesh Patel	Supports the policy	None. No proposed modifications
Nanji Vekariya	Considers the Policy to be sound.	None. No proposed modifications
Mohaniel Shah	Considers the Policy to be sound.	None. No proposed modifications
Paul Lang	Considers the Policy to be sound.	None. No proposed modifications
Peter Jones	The council need to take account of private resident concerns that parking is treated as a cash cow by the council, a way to top up council tax. Parking permits are just another side tax, and an excuse for the council to charge residents for living here. Council should instead look much harder at ways to extend capability and reduce cost by using the new wave of AI capability with us today. Now is exactly the time where more can be done for less, and with actual improvements in service quality for Harrow residents.	None. No proposed modifications

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Sandra Williams	As a foster carer I need to have visits from a variety of professionals including NHS representatives this would present problems for their necessary visits also my family visitors.	Noted. No proposed modifications
Chandrakant Shah	Restricted parking on part of Malvern Gardens after 6pm is useless and other part of Malvern gardens gets congested with parked vehicles. In short parking problems spills over to other parts of Malvern gardens.	Noted. No proposed modifications
Lucy Driver	The time needs to be to be increased from 8 am to 6.30 pm, to 8 am to 10 pm as most of the residents would have returned home by then. I also think this should include Saturday as well.	Noted. No proposed modifications
Mavji Varsani	Haven't got any issues with mi's parking and it should remain the same	Noted. No proposed modifications
Valji Patel	Does not consider the policy to be sound.	Noted. No proposed modifications
Hema Shah	Does not consider the policy to be sound.	Noted. No proposed modifications
Pravina Pindoria	No need to change parking policies as there's no current issues. Unfair to add cost of parking for permits in and around Harrow	Noted. No proposed modifications
Reshma Nanji	Objects	Noted. No proposed modifications
Devshi Raghvani	Objects	Noted. No proposed modifications
Arvind Hirani	I don't agree with this policy. Everything is fine how it is and it does not need to be changed.	Noted. No proposed modifications
Hetal Pawagadhi	People live on those streets should not be charged for parking permits	Noted. No proposed modifications
Andrei Todea	Parking should be free and this will affect household with multiple cars. It's been free since we moved here 15 years ago so no need to change that now!	Noted. No proposed modifications
Heni Patel	Don't like this policy at all	Noted. No proposed modifications
Nikita Pindoria	I don't consider there to be a parking issue that needs to be addressed. There are no nearby controlled parking zones, the overflow of which is causing issue with parking on our road so this point is irrelevant. In fact much of the green zone doesn't have controlled parking so there is no increased demand for spaces. We also have no issue with parking for ourselves and guests.	Noted. No proposed modifications

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>Furthermore, if this policy is to address a problem with dangerous parking and speeding, surely this is a problem better addressed by speed bumps.</p> <p>There is also no high demand for parking in this area. We do not live close enough to a station for our road to be used as commuter parking so this is irrelevant and the same applies for schools.</p>	
Perathep Muthiah	We have not experienced any issues with parking our vehicles near our property or anywhere on the road. It is not an issue for anyone in the household.re	<p>Noted.</p> <p>No proposed modifications</p>
Dhirendra Sachdev	No comment	<p>Noted.</p> <p>No proposed modifications</p>
Anna Cox	No consideration given to elderly ie. visitors (to co.bat loneliness), carers (3 visitors a day), numerous home services (mobile chiropodist, hairdresser, meal delivery). Yet more added expense to already financially stretched pensioners) ie purchase of visitors permits. Strong objection to this proposal.	<p>Noted.</p> <p>No proposed modifications</p>
Nimala Shah	Parking is a problem in the Opportunity Area. Although the policy suggests that developments near transport hubs will be carless, this doesn't actually happen. Take Eastman Village for example: most residents do not have an allocated car parking space, however they end up parking in the nearby roads causing existing residents to park far from their own properties.	<p>Car-free new development is only one policy to reducing car use from new development. Where parking strain exists, other parking measures may be required, which are outside the scope of the Plan.</p> <p>No proposed modifications</p>
CPRE	<p>A significant proportion of land in Harrow is kerbside space, most of which is likely to be used free or cheaply for private car parking. This space is increasingly needed for all kinds of green and active and sustainable travel infrastructure*. The Local Plan should propose, or at a minimum be underpinned by a proposal to, re-allocate of land-use for at least 25% of Harrow's kerbside space – referencing environmental, transport and health goals and establishing an appropriate target for reinstating kerbside as a public space.</p> <p>*Kerbside space is needed for bus and cycle lanes, cycle parking (secure, hire and visitor), shared mobility parking (including car share), delivery hubs, rain gardens, tree planting on build-outs, EV charging points on build-outs, parklets, pocket parks, play on the way features/play trails, and whole streetparks (e.g. as per Lambeth Council's Kerbside Strategy).</p>	<p>The Council is not aware of any evidence that shows this aspiration is deliverable in Harrow, including taking into account the consequences of changing the kerbside space to other uses.</p> <p>No proposed modifications</p>
TfL	We welcome changes to a number of policies that clarify that 'Car parking will be provided in line with Policy M2' However further changes are needed to the wording of Policy M2 itself to ensure it is consistent with London Plan Policy T6 as set out below.	<p>Noted.</p> <p>No proposed modifications</p>
TfL	We note that paragraph 10.2.2 states that 'Car free developments should be the starting point in areas that are well connected to public transport (PTAL 4-6).' This wording should be incorporated in the Policy to ensure consistency with London Plan Policy T6.	<p>The London Plan's parking standards are referenced in the Policy.</p> <p>No proposed modifications</p>
TfL	Part A - We welcome the change made to part A in line with our regulation 18 representation.	<p>Noted.</p> <p>No proposed modifications</p>
TfL	Part B - We note that no changes have been made to part B in response to our regulation 18 representation. We reiterate our strong recommendation that the following wording in part B should be deleted: ' Proposals involving parking provision that would not be consistent with the London Plan will be assessed having regard to any exceptional operational requirements and satisfactory	<p>Noted. Modification proposed to address this and representation in relation to Part H.</p> <p>Proposed Modification:</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	<p>mitigation, any special safety considerations and the desirability of achieving modal shift away from private car use. because proposals should be consistent with the London Plan.</p> <p>If any reference to 'exceptional operational requirements' is retained it needs to be defined in the glossary or supporting text based on the definition in London Plan Annex 3 which excludes parking for personal travel such as commuting.</p>	<p>Delete paragraph B and move H up to replace the deleted B and add additional text at the start so that the complete new Part B reads as: <u>'Sites which serve wide catchments in Harrow may need to continue to provide public car parking. On sites with existing public car parking in the Metropolitan and District Centres, or at strategic public transport or leisure nodes, any loss should be managed, based on an agreed local public parking strategy. Any proposed reduction of car parking (either on-street or off-street) should consider the overall parking provision in the centre, and should not adversely impact upon town centre vibrancy and vitality in line with the Harrow Parking Strategy. Proposals to improve the quality of existing off-street car parking will be supported and encouraged.'</u></p>
TfL	<p>We welcome the amended wording so that it now reads: 'The design and layout of parking areas (including those for scooters, motorcycles and bicycles) should be safe, secure and fit for purpose, Access to and from the public highway should maintain and, where necessary, improve safety and give priority to the convenience of pedestrians and cyclists <u>in line with London Plan Policy T2 (Healthy Streets).</u></p>	<p>Noted.</p> <p>No proposed modifications</p>
TfL	<p>Part E – We welcome deletion of the reference to inappropriate on-site parking so that it now reads: 'Proposals that would result in inappropriate on-site parking provision, having regard to the supporting text in this policy, and those which would create significant on-street parking problems, prejudice highway safety or diminish the convenience of pedestrians and cyclists, will be resisted.'</p>	<p>Noted.</p> <p>No proposed modifications</p>
TfL	<p>Part G - We welcome amendments to part G so that it now reads: 'Development in Town Centres should prioritise walking, cycling and public transport, including access to and from town centres. The public realm will be designed to support modal shift away from car use. Services and activities within the public realm will be supported. London Plan car parking maximums for office, retail and hotel accommodation must be complied with.'</p>	<p>Noted.</p> <p>No proposed modifications</p>
TfL	<p>Part H – We reiterate our regulation 18 representation that this part of the policy as currently drafted is not supported and should be amended to take account of London Plan standards, mode share targets, and the aim of encouraging active travel and reducing car use for access to town centres and rail stations. Town centre car parking should be the minimum necessary to meet essential needs, such as provision for disabled persons or operational car parking requirements and must be clearly justified on a case-by-case basis. This part of the policy should also be more supportive of the redevelopment of car parking for more productive uses in line with London Plan Policies GG1 Making the best use of land, H1 Increasing housing supply (Part Bb), SD7 Town centres (Part C6a) and Section 6 of the Sustainable Transport, Walking and Cycling LPG. To ensure consistency with the approach to parking in the London Plan we recommend that it is redrafted as follows: '<u>Proposals for the redevelopment of surplus, under-used or poorly located car parking for more productive uses are supported.</u> Any proposed reduction of car parking (either on-street or off-street) should consider the overall parking provision in the centre, and should not adversely impact upon town centre vibrancy and vitality in line with the Harrow Parking Strategy. Proposals to improve the quality of existing off-street car parking will be supported and encouraged.'</p>	<p>The Council believe that it is important that any reduction in town centre car parking is managed strategically in order to protect the vibrancy of the town centre.</p> <p>We acknowledge that the London Plan standards for new uses on sites should be the starting point of any new parking for users of the site.</p> <p>Modification proposed to address this and representation in relation to Part B.</p> <p>Proposed modification</p> <p>See modification set out above for Part B.</p>
TfL	<p>Para. 10.2.2 - We note that the amended wording 'Developments in areas with lower public transport connectivity (PTAL0-1) should adhere to both minimum and maximum parking standards as set by the London Plan, <u>except where a minimum provision would support additional family housing.'</u></p>	<p>Noted.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	Para. 10.2.7 - We note the amended wording 'On-site provision of vehicle parking can often overcome some issues with on-street parking particularly in residential areas where on-street parking can result in congestion and hindrance to traffic flow.' This is an improvement on the previous wording.	Noted. No proposed modifications
TfL	Para. 10.2.8 We welcome deletion of the final sentence as recommended in our regulation 18 representation.	Noted. No proposed modifications
TfL	<p>Para. 10.2.9 We recommend that this is redrafted as shown to better reflect the approach to parking in the London Plan</p> <p>'Car free developments are those that make no general on or off-site provision for car parking other than that required to meet the needs of disabled persons. Where located in areas of high public transport accessibility levels (PTAL4-6) and access to services through sustainable transport modes, such schemes are an effective means of delivering a modal shift away from private car use. New development must demonstrate that future occupiers' ability to access their reasonable shopping, service and employment needs would not be disadvantaged, and that visitors and other users of the development (particularly in respect of non-residential uses) would not be severely disadvantaged by the absence of car parking. In Harrow, the Harrow & Wealdstone Opportunity Area and town, district and neighbourhood centres with a PTAL of 4-6 provide the most suitable locations for car-free development. They provide occupiers with direct access to local shops, services and employment opportunities, and are generally served by multiple local bus services and/or a rail station for access to shops, services and employment elsewhere.'</p>	<p>We acknowledge that sites with PTAL 4-6 should generally be car free.</p> <p>Proposed Modification:</p> <p>Amend Para 10.2.9 to read: 'Car free developments are those that make no general on or off-site provision for car parking other than that required to meet the needs of disabled persons. Where located in areas of high public transport accessibility levels (PTAL4-6) and access to services through sustainable transport modes, such schemes are an effective means of delivering a modal shift away from private car use. Public parking plays an important role in underpinning the vitality and vibrancy of local centres, enabling a choice of modes, representing the wide range of goods and services visited within them. Public parking enables visitation from areas that are not well connected by public transport, and enable families to conveniently travel together, as well as facilitating the collection of bulky goods. This extends to other strategic assets, including leisure facilities that serve a sub-regional catchment, and parking at transport nodes that underpin mixed-mode travel within north London, and actively reduce congestion. New development must demonstrate that future occupiers' ability to access their reasonable shopping, service and employment needs would not be disadvantaged, and that visitors and other users of the development (particularly in respect of non-residential uses) would not be severely disadvantaged by the absence of car parking. In Harrow, the Harrow & Wealdstone Opportunity Area and town, district and neighbourhood centres with a PTAL of 4-6 provide the most suitable locations for car-free development. They provide occupiers with direct access to local shops, services and employment opportunities, and are generally served by multiple local bus services and/or a rail station for access to shops, services and employment elsewhere.'</p>
TfL	Para 10.2.11 We welcome the requirement for development to prioritise walking, cycling and public transport but this approach should not be confined to Opportunity Areas and town centres. It should apply to all areas of the borough and the wording amended as shown to reflect this. 'Development in the Harrow & Wealdstone Opportunity Area and Town Centres should prioritise walking, cycling and public transport.'	Noted and agreed. Proposed Modification: Amend paragraph 10.2.11 as follows: Development in the Harrow & Wealdstone Opportunity Area and Town Centres should prioritise walking, cycling and public transport.'
LB Brent	We are broadly supportive of this policy. We agree that car free developments should be the starting point in areas of high PTAL and that are well connected to public transport. However, we would	It is considered that the policy covers this already. Part E of the policy could however be enhanced to refer to mitigation.

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	reiterate that there is also a need to ensure that sufficient mitigation measures are put in place to limit on-street parking in neighbouring residential areas that may occur as a result, including in neighbouring boroughs. We suggest that this point forms part I. of Policy M2.	<p>Proposed modification</p> <p>Amend part E to read as follows: ‘Proposals that create significant on-street parking problems, prejudice highway safety or diminish the convenience of pedestrians and cyclists, will be resisted unless appropriate mitigation measures can be put in place.</p>
LB Barnet	The Council considers that the parking policy is unclear, although we acknowledge that the policy seems likely to change as part of the examination process. The one point of importance for LB Barnet is the need for LB Harrow to take account of LB Barnet’s policy on parking in the town centres we share (Barnet’s standards are set out in Table 20 of Policy TRC03 as set out in the Main Modifications).	<p>Noted.</p> <p>No proposed modifications</p>
National Highways	<p>Policy M2 outlines developer requirements in relation to onsite and offsite parking including adherence to London Plan maximum parking spaces. It also encompasses car clubs in lieu of parking spaces. Proposals creating on street parking problems will be resisted.</p> <p>It is recognised that households in Harrow continue to exhibit comparatively high levels of car ownership and that it is likely that car ownership will continue to be a preference for many residents. However, the policy informative explains that car free developments should be the starting point in areas that are well connected to public transport (PTAL 4-6). Developments in areas with lower public transport connectivity (PTAL0-1) should adhere to maximum parking standards as set by the London Plan. These standards are restrictive by historical benchmarks, limiting the amount of parking at levels below what would previously have been permitted.</p> <p>This policy accords with DfT Circular 01/22 requirements for managing down vehicular demand and contribute to the sustainable vision.</p>	<p>Noted.</p> <p>No proposed modifications</p>
Carter Jonas LLP	<p>Policy M2 (Parking) requires development proposals that make on-site provision for parking to be supported where the number of vehicle parking spaces (including those with electric vehicle charging points) complies with the maximum London Plan standards.</p> <p>The Council must appreciate that on sites with extant planning permissions, the requirement to deliver LCDS compliant cycle parking through the process of discharging planning conditions may reduce the quantum of cycle parking that can be delivered on-site and should ensure that Policy M2 is applied with this in mind.</p> <p>In summary, we therefore do not have any additional comments to make to those provided at the Regulation 18 consultation stage. We therefore continue to strongly agree to the approach set out in the Local Plan.</p>	<p>Noted.</p> <p>No proposed modifications</p>
Mayor of London	While the adoption of LP2021 maximum car parking standards is supported, further amendments to the wording of specific policies are needed to ensure that the Local Plan is fully consistent with LP2021 parking policies. A number of site allocations are proposing the re-provision of car parking where this would exceed maximum car parking standards. For a number of sites, the requirement to retain parking spaces does not take into account the location or PTAL and as a result fails to optimise use of the site. To ensure best use of land in well-connected locations, these requirements should be amended.	<p>Noted. These matters are addressed in detail in the responses to the representations from Transport for London.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Greg Dowden / Broadgate Development Partners Ltd	<p>Part A cycle parking standards promote an inefficient use of land as they require too much space to be given over to bicycles. Smaller more compact forms a cycle provision should be adopted by the LPA to enable their objectives to be achieved in a way that optimises the development potential of sites which doesn't lose too much space to cycle parking.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Reference to the London Plan's cycle parking standard is considered to be a sound approach in order to achieve general conformity with the London Plan (a legal requirement).</p> <p>No proposed modifications</p>
Carter Jonas for Barrat London	<p>Policy M2 (Parking) requires development proposals that make on-site provision for parking to be supported where the number of vehicle parking spaces (including those with electric vehicle charging points) complies with the maximum London Plan standards.</p> <p>The Council must appreciate that on sites with extant planning permissions, the requirement to deliver LCDS compliant cycle parking through the process of discharging planning conditions may reduce the quantum of cycle parking that can be delivered on-site and should ensure that Policy M2 is applied with this in mind.</p> <p>In summary, we therefore do not have any additional comments to make to those provided at the Regulation 18 consultation stage. We therefore continue to strongly agree to the approach set out in the Local Plan.</p>	<p>Noted.</p> <p>No proposed modifications</p>
Rolfe Judd obo Tesco Stores Ltd	<p>Draft Policy M2 proposes parking standards in alignment with the London Plan. Part H of the draft policy states:</p> <p><i>H. Any proposed reduction of car parking (either on-street or off-street) should have regard to the overall parking provision in the centre, and should not adversely impact upon town centre vibrancy and vitality. Proposals to improve the quality of existing off-street car parking will be supported and encouraged.</i></p> <p>Tesco support the inclusion of draft Policy M2.H. Retaining and improving sufficient car parking provision where it already exists is essential for the viability of the Station Road Tesco as well as the Harrow on the Hill and Harrow and Wealdstone Centres by providing continuity of linked trips that also support the wider viability of the town centre.</p>	<p>Noted.</p> <p>No proposed modifications</p>
Places for London	<p>Although we support the requirement that car parking should not exceed the maximum London Plan standards, the wording of the policy needs to be clearer on this point and should also encourage car-free development in well-connected locations. We also support the provision of cycle parking in line with the minimum London Plan standards.</p> <p>Regarding paragraph H, we consider that a more positive approach should be taken to reducing public car parking, including commuter car parking at Underground Stations where journeys can be shifted to more sustainable means: active walking and cycling, and use of buses.</p>	<p>We note that the London Plan policies do not support parking at public transport nodes.</p> <p>The Council considers that some parking at key transport nodes is of benefit to residents, and supports multimodal (car/PT) trips, and enable reduction in car-only trips.</p> <p>No proposed modifications</p>
Places for London	<p>In paragraph 10.2.2 additional text has been inserted and it is not clear to us what the link is between providing minimal car parking to support additional family housing. This needs to be explained in the supporting text if not the policy. Or if there is no such link, it should be deleted, subject to a general presumption that car parking should be minimised in line with the ambitions for healthy lives and healthy streets, vibrant communities for all and greener travel options.</p>	<p>This approach is consistent with London Plan Policy T6(K).</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>It is unreasonable to make the threshold for operational requirements an exception to London plan standards. This is likely to be a very difficult test to pass and will simply provide a further operational and practical barriers to Development coming forward.</p> <p>The Policy is therefore unlikely to be consistent with London Plan policy because of the conflict in standards. In addition it also means the LPA has not sufficiently justified the policy and therefore it is</p>	<p>The Council considers that there are justification for exceptions to the London Plan parking standards.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	not sound and cannot be adopted. The policy therefore should be re-drafted to reflect this point or deleted.	
Greg Dowden / Broadgate Development Partners Ltd	<p>Diminishing convenience for pedestrians and cyclists is a very subjective test. It will be impossible to apply quantitative solutions to it and therefore this creates significant uncertainty for application schemes. The policy is likely to be ineffective because of this vague criterion.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>The Council considers seeking not to prejudice the convenience of pedestrians and cyclists is an appropriate policy aim.</p> <p>No proposed modifications</p>

Policy M3 – Deliveries, Servicing & Construction

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	We welcome inclusion of the sentence 'Development proposals which facilitate sustainable freight movement by rail, waterways and road where appropriate, will be supported in line with Policy T7 of the London Plan.' However it would be useful to add 'including use of cargo bikes and zero emission vehicles for last mile deliveries and area or time restrictions on freight movements where appropriate.'	<p>Noted.</p> <p>Proposed Modification:</p> <p>Add to end of paragraph A the following: 'including use of cargo bikes and zero emission vehicles for last mile deliveries and area or time restrictions on freight movements where appropriate.'</p>
TfL	Part B – We note the amended wording 'Demonstrating through the submission of a Construction Management / Logistics Plan Statement (Major applications only), any impacts on the transport network during the construction phase of the development (including road closures and damage to the transport.'	<p>Noted.</p> <p>No proposed modifications</p>
TfL	Para. 10.3.1 – We note the additional reference to TfL Delivery and Servicing Plan guidance although this is more relevant to the section on Deliveries and Servicing than Construction Logistics.	<p>Noted and agreed.</p> <p>Proposed Modification:</p> <p>Move 'TfL Delivery and Servicing Plan guidance should be followed' from paragraph 10.3.1 to the end of 10.3.3.</p>
TfL	Para. 10.3.5 – We welcome the addition of the following although we suggest a further amendment as shown 'Consideration should also be given to the role of, and opportunities for, shared consolidation facilities for deliveries and servicing including micro consolidation hubs as a means of minimising vehicle movements, reducing overall levels of congestion and improving road safety.'	<p>Noted.</p> <p>Proposed Modification:</p> <p>Amend paragraph 10.3.5 as follows: "...shared consolidation facilities for deliveries and servicing including micro consolidation hubs as a means of minimising..."</p>
Anna Kosta	I think this will be good for the road. To stop people parking and going shopping.	<p>Assumed to be a Kenton West CPZ comment and therefore not relevant to the Local Plan.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	Development requires significant service and delivery trips. Whether this is a residential scheme or a business use deliveries are an essential fact of life. Reducing them therefore against no target whatsoever not only makes no sense but it is imprecise and vague. In addition, there is no acknowledgement that there may be positive benefits and trade-offs arising from increasing servicing for rent. For instance increase working from home may make	<p>The policy does not seek to reduce the amount of things delivered, but to reduce the impact of such deliveries by encouraging the reduction in the number of journeys, by improving end-of journey infrastructure, which will help to reduce congestion, with consequential environmental benefits.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>delivery more efficient and reduce the number of deliveries that have to be made at offices. There is no recognition of the complexity of modern life that will not be best best served simply by a flat reduction in the number of servicing delivery trips.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	No proposed modifications
Greg Dowden / Broadgate Development Partners Ltd	<p>Part B the threshold for a construction logistics plan should be clarified and made greater. The difference between a nine unit residential scheme and a 10 unit residential scheme is fractional but the implications in terms of having to produce a construction logistics plan are significant. The policy should contain a threshold separating small major developments from large major developments and the requirement for a construction logistics plan should only be applied to larger major developments.</p> <p>The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>It is considered that the use of the industry-wide major development threshold is appropriate. Any subsequent plan will be proportionate to the size of the development.</p> <p>No proposed modifications</p>
Greg Dowden / Broadgate Development Partners Ltd	<p>Part E contains the phrase where appropriate which adds uncertainty to the policy. Online retailing is a good thing which should be supported and there is no question that there may be circumstances where it is not.</p> <p>The doubt introduced into this policy will make it ineffective. The Policy is therefore unlikely to be effective because of the uncertainty. In addition it also means the LPA has not sufficiently justified the policy and therefore it is not sound and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>The policy supports improving end-of delivery infrastructure.</p> <p>No proposed modifications</p>

Site Allocations

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Historic England	We welcome that heritage considerations have been summarised for each Site Allocation. However, we suggest adding a caveat to the introduction which makes it clear that the considerations listed are a guide rather than definitive, and that HIAs should review the assets needing assessment using an understanding of the development/ heritage assets intervisibility (i.e. a study area informed by a zone of theoretical visibility), and the potential for effects on experiential qualities of its setting that contribute to significance.	<p>Paragraph 11.5 includes a suitable caveat to this effect. Heritage policies in the plan sets out requirements for HIAs (and paragraph 11.4 indicates the chapter does not seek to repeat every policy of the plan within the chapter.</p> <p>No proposed modifications</p>
Historic England	Additionally, as Harrow's APAs are being updated it would be worth caveating that the archaeological considerations listed in the Site Allocations may differ to that stated as new APAs may be identified, existing APAs may be amended and there is always some risk of unexpected archaeological remains.	<p>The heritage policies appropriately reference APAs.</p> <p>No proposed modifications</p>
Historic England	We welcome that visual considerations are included in the Site Allocations tables. However, as views are not heritage assets, we would advise that 'Protected Views/Visual Amenity' are listed in a separate row. That said, any heritage assets within the protected view e.g. St Mary's Church and the Harrow on the Hill Conservation Area) should be listed in the heritage section as, in addition to being a matter of visual amenity, the view will contribute to the significance and appreciation of the asset and change to that will require consideration via both a Visual Impact Assessment and a Heritage Impact Assessment.	<p>Noted.</p> <p>See modifications in individual site allocations.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>We noticed that there are a few heritage assets missing from some of the site allocations and recommended that the following are added:</p> <ul style="list-style-type: none"> - The locally listed Byron Recreation Ground - OA12, OA13, and OA14. - The Grade II listed Watling Farm – GB2 - Locally listed British Legion Club – O3 - Locally listed cemetery – O18 	
Historic England	<p>We welcome that several of the site allocations highlight where the setting of heritage assets may be changed by development. However, for clarity, we suggest that this is amended to refer to their significance being affected as a result of setting change. This should help remind applicants that setting is not separate to significance.</p>	<p>Noted.</p> <p>See modifications in individual site allocations.</p>
Historic England	<p>For some Site Allocations, it is stated as to whether the heritage assets are in the site, adjoining it, or nearby. This is helpful as it has implications for the development principles (e.g. assets needing retention, that the development should respond positively to, etc). For consistency and clarity, we would encourage that this is done throughout.</p>	<p>Noted.</p> <p>See modifications in individual site allocations.</p>
Historic England	<p>We welcome that some of the site allocations (e.g. OA9) clearly state that: <i>‘The site is located within a tall building zone and therefore tall buildings may be appropriate on the site. The arrangements of any tall buildings must respond positively within the site’</i> (or similar). In contrast, some site allocations (e.g. OA1-4) state that: <i>‘The Site is appropriate for tall development...’</i>. We advise that the site allocations consistently state that <i>‘tall buildings may be appropriate’</i> as this accords with London Plan policy D9.B, and better reflects the evidence base and the fact that the locations are untested beyond townscape considerations. For clarity, we also suggest that it is made clear where site allocations are not suitable for tall buildings.</p>	<p>Noted.</p> <p>Proposed Modification:</p> <p>Amend text in Policies OA1-4 to: ‘...tall buildings may be appropriate...’</p>
Historic England	<p>We advise that the ‘appropriate’ tall building heights are specified for each site, with ‘maximum’ heights given in relation to any sites with significant constraints.</p>	<p>This information is available on the map accompanying GR4 Building Heights and is shown on the Policies Map.</p> <p>No proposed modifications</p>
Historic England	<p>We welcome that development principles are provided where there is the potential for protected views to be affected. For example: <i>‘The site is appropriate for tall building development, with consideration required to be taken in relation to the protected viewing corridors towards St Mary’s Church on Harrow on the Hill. New development must ensure that publicly accessible viewing opportunities are maintained.’</i></p> <p>We also support that in some cases (e.g. OA5, OA6, O7, O13) this is also done for heritage assets. However, we encourage a more consistent approach to policy being translated into development principles for all site allocations with heritage considerations. For instance, it could be consistently highlighted that:</p> <ul style="list-style-type: none"> - That HIA/archaeological desk-based assessments and/or TVIA assessments will be needed. - That the significance of the heritage assets and/ or value of the view should be conserved, and any harm minimised and justified. - Were policy sets out a presumption in favour of retaining built heritage assets and/or preserving archaeological remains in situ. - SPDs or conservation area appraisals/management should be referred to. 	<p>Noted.</p> <p>See modifications in individual site allocations.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed																																																																	
	<p>As an example: <i>‘Development should seek to conserve and enhance the significance of Harrow on the Hill Conservation Area, with reference to the development guidance in the Harrow on the Hill Conservation Areas SPD.’</i></p> <p>Some further specific points are raised in the comments below for particularly sensitive site allocations.</p>																																																																		
Historic England	<p>Site Allocations in Harrow South, East, and West</p> <p>These site allocations, which are for tall buildings, sit to the north of Harrow on the Hill Conservation Areas at the intersection of several protected views. Most of these views are of Harrow on the Hill Conservation Area, indicating that tall buildings could affect not only the visual amenity of the views, but also the significance (or appreciation of the significance) of the conservation areas or heritage assets them e.g. the grade I St Mary’s Church which has heritage value as a local landmark. Given the sensitivity of the conservation areas and St Mary’s Church we advise that more detailed site allocation policies are set out. These could highlight the need to conserve and enhance the protected views and the significance of nearby heritage assets. They could also highlight that appropriate heights need to be informed by a full design review and that HIAs will be needed, placing a particular emphasis on the need for the cumulative assessment of effects to the conservation areas and church.</p>	<p>It is not the place of the site allocations text to repeat policies to such an extent suggest, but to identify key constraints. Reference will also need to be had to the relevant policies in the plan; this is reflected in paragraph 11.4.</p> <p>No proposed modifications</p>																																																																	
LB Harrow Internal Mod	<p>To reflect the latest evidence on site capacities, updates on site delivery, and clarify capacities in terms of C2/3/4 floorspaces, the following modifications are proposed.</p>	<p>Proposed Modification:</p> <p>OA7: Update Capacity to 463/509 units OA9: Update numbers to 955/ 1,051 units OA10 Clarify that the number is 18/20 C3 units’ equivalent floorspace OA14: Update to 638/702 O4: Update to 292/292 units O14: Update to 25/28 C3 units’ equivalent floorspace O18: Clarify 25/25 C3 units’ equivalent floorspace O19: Update Capacity to 52/57 units</p>																																																																	
LB Harrow Internal Mod	<p>To reflect changes to site capacities, the table on p294 of the R19 would need to be amended to:</p> <table border="1" data-bbox="382 1318 2415 1883"> <thead> <tr> <th data-bbox="382 1318 1207 1392" rowspan="2">Category</th> <th data-bbox="1207 1318 1403 1392">Past completions</th> <th data-bbox="1403 1318 1581 1392">Pre-adoption</th> <th data-bbox="1581 1318 1762 1392">Years 1-5</th> <th data-bbox="1762 1318 1949 1392">Years 6 – 10</th> <th data-bbox="1949 1318 2139 1392">Years 11 – 15</th> <th data-bbox="2139 1318 2415 1392">Total</th> </tr> <tr> <th data-bbox="1207 1392 1403 1476">(19/20 – 23/24)</th> <th data-bbox="1403 1392 1581 1476">(24/25 – 25/26)</th> <th data-bbox="1581 1392 1762 1476">(26/27 - 30/31)</th> <th data-bbox="1762 1392 1949 1476">(31/32 – 35/36)</th> <th data-bbox="1949 1392 2139 1476">(36/37 – 40/41)</th> <th data-bbox="2139 1392 2415 1476"></th> </tr> </thead> <tbody> <tr> <td data-bbox="382 1476 1207 1518">Surplus housing delivered between 19/20 – 20/21</td> <td data-bbox="1207 1476 1403 1518">454</td> <td data-bbox="1403 1476 1581 1518"></td> <td data-bbox="1581 1476 1762 1518"></td> <td data-bbox="1762 1476 1949 1518"></td> <td data-bbox="1949 1476 2139 1518"></td> <td data-bbox="2139 1476 2415 1518">454</td> </tr> <tr> <td data-bbox="382 1518 798 1560" rowspan="3">Completions 21/22 – 23/24</td> <td data-bbox="798 1518 1207 1560">Opportunity area</td> <td data-bbox="1207 1518 1403 1560">1,464</td> <td data-bbox="1403 1518 1581 1560"></td> <td data-bbox="1581 1518 1762 1560"></td> <td data-bbox="1949 1518 2139 1560"></td> <td data-bbox="2139 1518 2415 1560">1,464</td> </tr> <tr> <td data-bbox="798 1560 1207 1602">Outside opportunity area</td> <td data-bbox="1207 1560 1403 1602">460</td> <td data-bbox="1403 1560 1581 1602"></td> <td data-bbox="1581 1560 1762 1602"></td> <td data-bbox="1949 1560 2139 1602"></td> <td data-bbox="2139 1560 2415 1602">460</td> </tr> <tr> <td data-bbox="798 1602 1207 1644">Total</td> <td data-bbox="1207 1602 1403 1644">1,924</td> <td data-bbox="1403 1602 1581 1644"></td> <td data-bbox="1581 1602 1762 1644"></td> <td data-bbox="1949 1602 2139 1644"></td> <td data-bbox="2139 1602 2415 1644">1,924</td> </tr> <tr> <td data-bbox="382 1644 798 1686" rowspan="3">Under construction</td> <td data-bbox="798 1644 1207 1686">Opportunity area</td> <td data-bbox="1207 1644 1403 1686"></td> <td data-bbox="1403 1644 1581 1686">365</td> <td data-bbox="1581 1644 1762 1686">257</td> <td data-bbox="1949 1644 2139 1686">0</td> <td data-bbox="2139 1644 2415 1686">622</td> </tr> <tr> <td data-bbox="798 1686 1207 1728">Outside opportunity area</td> <td data-bbox="1207 1686 1403 1728"></td> <td data-bbox="1403 1686 1581 1728">357</td> <td data-bbox="1581 1686 1762 1728">74</td> <td data-bbox="1949 1686 2139 1728">0</td> <td data-bbox="2139 1686 2415 1728">431</td> </tr> <tr> <td data-bbox="798 1728 1207 1770">Total</td> <td data-bbox="1207 1728 1403 1770"></td> <td data-bbox="1403 1728 1581 1770">722</td> <td data-bbox="1581 1728 1762 1770">331</td> <td data-bbox="1949 1728 2139 1770">0</td> <td data-bbox="2139 1728 2415 1770">1,053</td> </tr> <tr> <td data-bbox="382 1770 798 1812"></td> <td data-bbox="798 1770 1207 1812">Opportunity area</td> <td data-bbox="1207 1770 1403 1812"></td> <td data-bbox="1403 1770 1581 1812">17</td> <td data-bbox="1581 1770 1762 1812">100</td> <td data-bbox="1949 1770 2139 1812">0</td> <td data-bbox="2139 1770 2415 1812">117</td> </tr> </tbody> </table>		Category	Past completions	Pre-adoption	Years 1-5	Years 6 – 10	Years 11 – 15	Total	(19/20 – 23/24)	(24/25 – 25/26)	(26/27 - 30/31)	(31/32 – 35/36)	(36/37 – 40/41)		Surplus housing delivered between 19/20 – 20/21	454					454	Completions 21/22 – 23/24	Opportunity area	1,464				1,464	Outside opportunity area	460				460	Total	1,924				1,924	Under construction	Opportunity area		365	257	0	622	Outside opportunity area		357	74	0	431	Total		722	331	0	1,053		Opportunity area		17	100	0	117
Category	Past completions	Pre-adoption		Years 1-5	Years 6 – 10	Years 11 – 15	Total																																																												
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Who Responded	Summary of main issue raised				Council response & modification(s) proposed			
	Permissions or legal agreements	Outside opportunity area		92	330	0		422
		Total		109	430	0		539
	Non-conventional supply	Opportunity area		5	1	0		
		Outside opportunity area		58	-68	0		
		Total		63	-67	0		
	Small sites				375	1,875	1,875	4,125
	Allocations	Opportunity area		869	2,992 2,980	2,333 2,157	780 702	6,974 6,708
		Outside opportunity area			466 451	1,211 1,162	231 210	1,908 1,823
		Total		869	3,458 3,431	3,544 3,319	1,011 912	8,882 8,531
	Total	Opportunity area	1,633	1,256	3,350 3,338	2,333 2,157	780 702	9,352 9,086
		Outside opportunity area	745	507	802 787	1,211 1,162	231 210	3,496 3,411
		Small sites	0	0	375	1,875	1,875	4,125
		Total	2,378	1,763	4,527 4,500	5,419 5,194	2,886 2,787	16,973 16,621

Site Allocations – Opportunity Area

Allocation OA1 – Queens House Car Park

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	<p>The site has a PTAL of 6a, is within Harrow Metropolitan Town Centre and is within Harrow and Wealdstone Opportunity Area and so there should be no car parking associated with any development. Any limited re-provision of public car parking should be for essential needs only such as disabled persons' or operational parking requirements, taking into account overall town centre parking supply. The requirement for re-provision of car parking is inappropriate in this location, would provide a constraint to improving the public realm and would fail to maximise use of a well-connected site within the town centre. Kymberley Road is also an important route for buses with stops and stands including for Superloop services and so any redevelopment of the site should take this into account. The following changes are necessary to ensure soundness and consistency with parking policies and standards in the London Plan.</p> <p>The site objective should be amended to remove reference to re-provision of car parking as follows: 'Deliver a mixed-use development that provides high quality residential homes and appropriate town centre uses [in] the Harrow Metropolitan Town Centre, while ensuring a satisfactory re-provision of car parking spaces.'</p> <p>The allocated use 'Reprovision of carpark spaces' should be deleted.</p> <p>The requirement for 'Car parking re-provision (public and private parking)' should be deleted.</p>	<p>The Council agree that the parking requirement for the new uses on the site should be restricted in line with the London Plan's parking standards and Policy M2 of this Plan, other than for disabled users, due to the good PTAL in line with Policy M2. There is however, a need to ensure a sufficiency of convenient public car parking to support the role of the Metropolitan town centre.</p> <p>It is considered that this site currently offers public town centre car parking that underpins trips to the centre from areas not well served by public transport, thereby underpinning the vibrancy and vitality of the town centre.</p> <p>As such the Council considers there may be a requirement for public car parking on this site, and this should be reflected in the allocated uses on the site. This is in line with London Plan Policy T6.3.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>In the development principles the following amendment should be made: ‘Car free development except for disabled persons’ or operational parking requirements. Any public car parking will need to be justified, taking into account the existing supply of town centre car parking. Re-provision of appropriate levels of car parking (both in relation to supporting new development and wider public car parking provision to serve the town centre) must be demonstrated.</p>	<p>Proposed Modification</p> <p>Town Centre, while ensuring a satisfactory reprovision of car parking spaces.’</p> <p>The allocated use ‘Reprovision of carpark spaces’ should be deleted.</p> <p>The requirement for ‘Car parking reprovision (public and private parking)’ should be deleted.</p> <p>In the development principles the following amendment should be made: ‘Car free development except for disabled persons’ or operational parking requirements. Any public car parking will need to be justified, taking into account the existing supply of town centre car parking. Re-provision of appropriate levels of car parking (both in relation to supporting new development and wider public car parking provision to serve the town centre) must be demonstrated.’</p>
HTA obo Tide Construction	<p>Tide Construction has held positive pre-application engagement with LBH since January 2023 regarding the emerging development proposals for the Site and is working collaboratively with the Council to develop a sound strategy for the delivery of the Site. The principle of development of a high-density co-living scheme has been supported by the LBH planning team. Detailed discussions around matters including heritage and townscape, the design strategy for taller buildings, landscape and transport matters have informed the emerging proposals. Feedback has been gained from LBH Officers, the GLA, Harrow’s Design Review Panel and Harrows Planning Policy Advisory Panel. It has been recognised that the removal of parking element is critical to unlocking the potential of the Site, which has a PTAL level of 6b and therefore benefits from excellent public transport connections.</p>	<p>Noted.</p> <p>No proposed modifications</p>
HTA obo Tide Construction	<p>The GLA has stated that the comprehensive redevelopment of this site to provide large-scale shared living could be supported in strategic planning terms given the highly accessible town centre location. However, they noted that the overall design proposals presented at pre-app stage have been significantly compromised by the Harrow’s New Local Plan Regulation 19 Consultation reprovision of the town centre car parking, with reprovision not supported in strategic transport terms. The GLA has requested that our client and LPA explore how a reduction in the quantum of car parking can be achieved, given the Site’s town centre location and existing availability of car parking within the vicinity.</p> <p>Tide Construction have commissioned a Transport Assessment Scoping Report, which has found that Queens House remains an underused public car park with a vacancy rate of 65%, reflecting its limited role in the context of wider town centre parking within Harrow. The Sites’ accessibility to public transport and connectivity to the wider town centre is a key consideration, and the requirement in the proposed site allocation for the reprovision of an underused car park is not in line with strategic planning policy, introducing a restrictive requirement.</p> <p>The Scoping Report demonstrates that if public/leased car parking were to be removed from the Site, the existing nearby Greenhill Way and Davey House Car Parks location in the Town Centre will still be able to maintain a worst-case or ‘peak’</p>	<p>The Council agrees that the parking requirement for the new uses on the site should be restricted in line with the London Plan’s parking standards and Policy M2 of this Plan, other than for disabled users, due to the good PTAL in line with Policy M2. There is however, a need to ensure a sufficiency of convenient public car parking to support the role of the Metropolitan town centre.</p> <p>It is considered that this site currently offers public town centre car parking that underpins trips to the centre from areas not well served by public transport, thereby underpinning the vibrancy and vitality of the town centre.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>occupancy level of 84%. This is within the 85% target set out within the 'Harrow Parking Management and Enforcement Strategy' (2019).</p> <p>In line with the pre-application feedback from the GLA and the findings of the scoping report, we wish to re-emphasise how the current site allocation wording places an excessive restriction in requiring re-provision of car parking, limiting the optimal capacity and deliverability of the Site for the provision of new much-needed housing. The proposed allocation wording should be amended to remove the requirement for parking re-provision, this requirement cannot be justified in the context of strategic planning policy, placing a disproportionate constraint on the redevelopment of the Site.</p> <p>The NPPF 2024 places an emphasis on optimising the density of development in town centres and locations that are well served by public transport. There is no clear or compelling justification for including the re-provision of car parking as a requirement. The approach would significantly restrict the optimisation of the Site Allocation. The proposed re-provision should be deleted from the allocation wording to ensure consistency with national policy.</p>	<p>As such the Council considers there may be a requirement for public car parking on this site, and this should be reflected in the allocated uses on the site. This is in line with London Plan Policy T6.3.</p> <p>Proposed Modification</p> <p>As per TfL Response.</p>
HTA obo Tide Construction	<p>The proposed site allocation details an indicative residential capacity of 129 homes (Use Class C3). It is unclear how this development capacity has been calculated by the LPA. Design strategies discussed with the LPA through the pre-application process have been based on a co-living scheme as opposed to a conventional C3 residential use, capable of delivering c.466 units.</p> <p>Analysis has been undertaken and presented at pre-application meetings demonstrating why the site is more appropriate for co-living over traditional residential (Use Class C3). The key challenges of delivering traditional housing at the Site include the creation of a lower quality layout with a high proportion of single aspect homes. On-site amenity space would be compromised by a traditional form of housing in terms of location, quality, and usability. As an alternative, co-living is an efficient means of delivering high quality space, making it an excellent fit for town centre locations that require high-density housing solutions. Co-living also helps foster new communities, and will strengthen Harrow town centre, placing new residents on the doorsteps of local shops and restaurants.</p> <p>Co-living housing is a large-scale purpose-built shared living offer suitable for high-density design solutions and is therefore well placed to deliver new accommodation on the proposed Site Allocation OA1, which includes a designation for a tall building within the defined design principles.</p> <p>Co-living has emerged as a global trend which responds to several inter-related issues facing an increasingly urbanised population, covering, affordability, sustainability, urban loneliness, and changes in lifestyles. Co-living has the following common characteristics; an internal community where people choose to share space, smaller homes in exchange for larger shared high-quality provisions and a more communal and connected lifestyle and convenient lease terms with flexible arrangements that can accommodate changes in residents' circumstances.</p> <p>The emerging development proposals for the Site are set within a highly sustainable location, which aligns with London Plan Policy H16 and the spatial strategy for growth in the Local Plan, prioritising accessible town centre locations, which would not contribute to car dependency. The approach reflects the key priorities of the NPPF, with substantial weight applied to the value of using suitable brownfield land within settlements for homes and identified needs. The site allocation should be amended to positively plan for co-living, reflecting the potential for delivering a co-living scheme on site, providing flexibility under the defined land use definitions and amending the defined indicative site capacity to reflect pre-application capacity studies and the extensive engagement undertaken with the LPA.</p>	<p>The Council's housing need evidence does not identify a significant unmet need for co-living housing but a need for C3 dwelling houses, particularly larger family-size housing.</p> <p>The Council agrees that the site is in a sustainable location, and that development capacity should be optimised to make the best use of land.</p> <p>Development capacities have been identified through the undertaking of design-led capacity assessment of each site allocation [following guidance set out in the Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023)]. The Council considers represents an appropriate method of identifying capacities within the Plan. Further design work through the planning application stages will help to refine the capacity of each site as greater detail is added.</p> <p>No proposed modifications</p>
RAF Northolt	<p>Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement, Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous</p>	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Environment Agency	We believe using the term “Flood zone (Surface Water) 3a” is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	<p>Proposed Modification:</p> <p>Replace Flood zone (Surface Water) 3a with:</p> <p><u>The site is at high risk of surface water flooding, particularly along the south east of the site.</u></p> <p><u>Safe access and egress routes should be directed to the north west of the site towards Kymberley Road where there is a lower risk of flooding. Development should be directed away from the southern eastern areas of the site where there is higher risk of surface water flooding.</u></p>

Allocation OA2 – Harrow on the Hill Underground & Bus Station

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Thames Water	On the information provided, modelling will be required, and it is anticipated that upgrades to network will be necessary	Noted. No proposed modifications
Environment Agency	We believe using the term “ <i>Flood zone (Surface Water) 3a</i> ” is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	<p>Proposed Modification:</p> <p>Replace Flood zone (Surface Water) 3a with:</p> <p><u>The site is at high risk of surface water flooding, particularly along Station Approach.</u></p> <p><u>Safe access and egress routes should be directed to the northwest of the northern site towards College Road and southwest of the southern site towards Lowlands Road where there is a lower risk of flooding. Development should be directed away from the northern area of the northern site and southeast area of the southern site where there is higher risk of surface water flooding.</u></p>
TfL	<p>The sites are owned by TfL and so a separate response will be submitted by Places for London.</p> <p>The site has a PTAL of 6a, is within Harrow Metropolitan Town Centre and is within Harrow and Wealdstone Opportunity Area and so there should be no car parking associated with any development. Any limited re-provision of public car parking should be for essential needs only such as disabled persons’ or operational parking requirements, taking into account overall town centre parking supply.</p> <p>The site objective should be amended to refer to TfL’s future requirements as shown ‘Redevelopment of the site to provide a landmark / wayfinding development that will deliver housing, town centre uses and an enhanced public transport hub. An enhanced transport hub must deliver greater accessibility (including step free access from the southern entrance of the train station) and ensure transportation capacity is met over the plan period in line with TfL’s future requirements.’</p>	<p>The Council is content to agree the proposed modifications in order to better reflect within the Local Plan TfL’s objectives for delivering improvements to the operation of the public transport network.</p> <p>Proposed Modification</p> <p>... An enhanced transport hub must deliver greater accessibility (including step free access from the southern entrance of the train station) and ensure</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>The bus station uses should be retained and enhanced and so we welcome references to this in the development considerations. However, we recommend amendments to the wording as shown:</p> <p>The development requirement 'Improved bus station to provide for capacity over the plan period and proposed electrification of the bus fleet' should be amended to read 'Provision of an enhanced bus station to accommodate the future bus network; including capacity for forecast growth and the necessary infrastructure for the zero emission bus fleet.'</p> <p>The development principle 'Redevelopment of the site must ensure a modernised bus station be delivered to ensure sufficient capacity over the plan period and includes the necessary infrastructure for the electrification of the network' should be amended to read 'Redevelopment of the site must ensure delivery of a modernised and enhanced bus station, which meets TfL's Passenger and Operational Requirements for the future bus network; including capacity for forecast growth and the necessary infrastructure to accommodate the zero emission bus fleet.'</p> <p>In the development considerations we welcome the requirement 'Provision of step free access to the southern side of the Harrow on the Hill underground station.'</p>	<p>transportation capacity is met over the plan period in line with TfL's future requirements.</p> <p>The bus station uses should be retained and enhanced and so we welcome references to this in the development considerations. However, we recommend amendments to the wording as shown: The development requirement 'Improved bus station to provide for capacity over the plan period and proposed electrification of the bus fleet' should be amended to read <u>Provision of an enhanced bus station to accommodate the future bus network; including capacity for forecast growth and the necessary infrastructure for the zero emission bus fleet.</u></p> <p>The development principle 'Redevelopment of the site must ensure a modernised bus station be delivered to ensure sufficient capacity over the plan period and includes the necessary infrastructure for the electrification of the network' should be amended to read <u>Redevelopment of the site must ensure delivery of a modernised and enhanced bus station, which meets TfL's Passenger and Operational Requirements for the future bus network; including capacity for forecast growth and the necessary infrastructure to accommodate the zero emission bus fleet.</u></p>
Places for London	<p>We welcome the inclusion of this site allocation covering TfL / Places for London's landholdings. The proposals are in line with our 'call for sites' submission at Regulation 18 stage.</p> <p>The draft site allocation recognises the potential for a landmark mixed use development, noting the site location within a tall building zone and its close proximity to a number of recently constructed high density mixed use schemes. This is appropriate given the location within Harrow Metropolitan Town Centre and OA and PTAL 6b which is the highest level of connectivity. The overall approach is considered sound and in line with the NPPF and London Plan objective to make best use of land and enable higher density development in accessible locations.</p> <p>The objective to deliver an enhanced transport hub with improved accessibility (including step-free access from the southern station entrance) and appropriate public transport capacity improvements, including a modernised bus station, is also strongly supported.</p> <p>The development requirements and principles are supported, in particular, the aim to deliver improved and more successful public realm on both sides of the station including enhanced connectivity from station into Harrow Town Centre.</p>	<p>Noted.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Places for London	<p>It should be noted that the redevelopment of the site provides the opportunity to significantly enhance the northern section of Lowlands Recreation Ground as part of a successful, design-led, high-density development. Given the depth of the surface car park plot, it may be necessary for a limited amount of development footprint or supporting structural columns to move slightly to the south and moderately protrude into the open space and designated Metropolitan Open Land (MOL). In design terms, this would enable any future scheme to successfully respond to the site allocation objectives in terms of improved public realm by introducing active frontages, natural surveillance and enhancing the overall arrival experience at the southern side of the station and sense of safety, particularly after dark. Any loss of MOL / public open space would need to be fully justified in terms of very special circumstances and mitigated, in line with the London Plan and NPPF.</p> <p>Consideration could be given to adding reference to improving the edge of the Lowlands Recreation Ground by siting development blocks and active frontages at its northern end. This could be added to the development principles and flagged as a key development / design objective for the site allocation.</p> <p>Overall, we welcome the opportunity to work positively and collaboratively with the Council to bring forward a viable and deliverable high quality scheme in this location which provides the type of transformative regeneration and transport benefits envisaged in the site allocation.</p>	<p>Enhanced public realm to Lowlands Recreation Ground is already included as a design requirement. It would however not be appropriate to speculate on any potential encroachment onto MOL / public space in the site allocation. This would require very special circumstances to be demonstrated and that can only be done once a detailed design has been prepared and all other feasible options considered, amongst other considerations.</p> <p>No proposed modifications</p>
RAF Northolt	<p>Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to</p>	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations.</p> <p>No proposed modifications</p>

Allocation OA3 – 15-29 College Road

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
RAF Northolt	<p>Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</p>	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations.</p> <p>No proposed modifications</p>

Allocation OA4 – Havelock Place

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
RAF Northolt	<p>Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement, Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.</p>	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations.</p> <p>No proposed modifications</p>

Allocation OA5 – Station Rd East

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Ikram Rana	At kenton Lane in front number 12 there is a bus stop, and there are also free parking , in rush hours if bus is stop at the stop so all road is blocked, i will happy if you add there double yellow lane at the end of the bus stop , so in rush hours there will be no traffic on the road, thanks	Unclear what the representation is seeking. Kenton West CPZ response. No proposed modifications
Environment Agency	We believe using the term “ <i>Flood zone (Surface Water) 3a</i> ” is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Proposed Modification: Replace Flood zone (Surface Water) 3a with: Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.
Sorbon Estates Ltd	As owners of Congress House and 342 - 352 Station Road we welcome the proposed inclusion of Site Allocation OA5 - Station Road East, Harrow within the latest version of the Draft Harrow Local Plan (November 24). We consider the mix of uses identified (retail and residential) appropriate for this sustainable town centre location and while we do not object to the indicative residential capacity of 171 units, we feel there is scope to increase these numbers given the size of the site and the surrounding context. A comprehensive redevelopment of the site would clearly be ideal but given the differing ownerships we welcome acknowledgement that the site could come forward on a piecemeal basis albeit in a way that would enable the various phases to be read collectively. To that end we feel the exclusion of 358-366 Station Road is a missed opportunity and should be reconsidered. On an administrative point we would like to clarify that there is a current Prior Approval application relating to Congress House (Ref P/3143/21/PRIOR) which has been recommended for approval awaiting completion of a legal agreement.	Noted. No proposed modifications
RAF Northolt	Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement, Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily	Noted, reference has been made to the RAF safeguarding zone in the Allocations’ Planning Considerations. No proposed modifications

Allocation OA6 – Greenhill Way

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	The site has a PTAL of 6a, is within Harrow Metropolitan Town Centre and is within Harrow and Wealdstone Opportunity Area and so there should be no car parking associated with any development. Any limited re-provision of public car parking should be for essential needs only such as disabled persons’ or operational parking requirements, taking into account overall town centre parking supply. The requirement for re-provision of car parking is inappropriate in this location and would fail to maximise use of a well-connected site within the town centre. The following changes are necessary to ensure soundness and consistency with parking policies and standards in the London Plan. The allocated use ‘ Car parking ’ should be deleted. The requirement for ‘ Car parking provision to serve town centre / new development ’ should be deleted.	The Council agrees that the parking requirement for the new uses on the site should be restricted in line with the London Plan’s parking standards and Policy M2 of this Plan, other than for disabled users, due to the good PTAL in line with Policy M2. There is however, a need to ensure a sufficiency of convenient public car parking to support the role of the Metropolitan town centre.

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>In the development principles the following amendment should be made: ‘Car free development except for disabled persons’ or operational parking requirements. Any public car parking will need to be justified, taking into account the existing supply of town centre car parking Carparking will continue to be required at a level that is supportive of both any new development and for the Harrow Metropolitan Town Centre. New development will have to demonstrate an appropriate level of carparking.’</p>	<p>It is considered that this site currently offers public town centre car parking that underpins trips to the centre from areas not well served by public transport, thereby underpinning the vibrancy and vitality of the town centre.</p> <p>As such the Council considers there may be a requirement for public car parking on this site, and this should be reflected in the allocated uses on the site. This is in line with London Plan Policy T6.3.</p> <p>Proposed Modification</p> <p>The allocated use ‘Car parking’ should be deleted.</p> <p>The requirement for ‘Car parking provision to serve town centre / new development’ should be deleted.</p> <p>In the development principles the following amendment should be made: ‘Car free development except for disabled persons’ or operational parking requirements. Any public car parking will need to be justified, taking into account the existing supply of town centre car parking Carparking will continue to be required at a level that is supportive of both any new development and for the Harrow Metropolitan Town Centre. New development will have to demonstrate an appropriate level of carparking.’</p>
RAF Northolt	<p>Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement, Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.</p>	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations’ Planning Considerations.</p> <p>No proposed modifications</p>
Environment Agency	<p>We believe using the term “Flood zone (Surface Water) 3a” is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Proposed Modification:</p> <p>Replace Flood zone (Surface Water) 3a with:</p> <p><u>Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.</u></p>

Allocation OA7 – Tesco Station Rd

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Suresh Shah	As an 80yr old living right next to Tesco car park in a retirement home, I am very scared to see more high rise buildings in Harrow as it will ruin the landscape and ruin the skyline. My wife and I are very distressed thinking that if Tesco obtains planning permission in the car park it will cause years of congestion near the Tesco roads and make life a misery for all those in the retirement block.	Tall buildings zones have been identified through an evidence-based approach and set out in policy and policies maps as required by the London Plan (2021), with the Harrow & Wealdstone Opportunity Area identified as the most sustainable and appropriate location for them. Detailed policy requirements for tall buildings are set out in Policy GR4 Building Heights. No proposed modifications
Suresh Shah	I dread to think more backlogs in hospitals & GPs with an influx of so many people due to so may flats with 18 storey buildings. Please please stop these high rise buildings in Harrow that will make Harrow a misery place to live in making it feel like a concrete jungle.	The Council has prepared an Infrastructure Delivery Plan to identify how infrastructure commensurate with growth will be delivered. No proposed modifications
Hina Shah, Bhavesh Shah, Mita Shah	Very very unhappy with potentially more high rise buildings in Harrow (especially in Tesco car park). More high rises will result in making Harrow a nasty place to live as it will feel very concrete like & make the skyline look horrible. As usual there will be no significant change to existing infrastructure and result in more congestion, as will likely create more cars coming in as people come to visit relatives. Also, trains and schools and GP's will be massively negatively impacted and result in more backlogs. Next to Tesco there is a retirement home and they suffer even more with pollution and end up having horrible years especially during summer as they will find it difficult to keep windows open or go sit in the garden whilst construction is ongoing for many many years.	Tall buildings zones have been identified through an evidence-based approach and set out in policy and policies maps as required by the London Plan (2021), with the Harrow & Wealdstone Opportunity Area identified as the most sustainable and appropriate location for them. Detailed policy requirements for tall buildings are set out in Policy GR4 Building Heights. The Council has prepared an Infrastructure Delivery Plan to identify how infrastructure commensurate with growth will be delivered. No proposed modifications
Thames Water	On the information provided, modelling will be required, and it is anticipated that upgrades to network will be necessary	Noted. No proposed modifications.
Environment Agency	We believe using the term “ <i>Flood zone (Surface Water) 3a</i> ” is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Proposed Modification: Replace Flood zone (Surface Water) 3a with: Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.
TfL	The site has a PTAL of 3 -4 with a very small area of PTAL 5 on the site frontage, is on the edge of Harrow Metropolitan Town Centre and is within Harrow and Wealdstone Opportunity Area and so car parking should be minimised in line with London Plan standards. In the requirements the following amendment should be made: ‘Re-provide the existing supermarket with limited car parking in line with London Plan standards to avoid a site that is dominated by surface car parking and sufficient associated parking. ’ In the development principles the following amendment should be made: ‘Improve pedestrian access to the site, and pedestrian links between the site and Harrow town centre. including use of the car park for linked trips. ’	The Council agrees that the parking requirement for the new uses on the site should be restricted in line with the London Plan’s parking standards and Policy M2 of this Plan, other than for disabled users, due to the good PTAL in line with Policy M2. There is however, a need to ensure a sufficiency of convenient public car

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>parking to support the role of the Metropolitan town centre.</p> <p>It is considered that this site currently offers public town centre car parking that underpins trips to the centre from areas not well served by public transport, thereby underpinning the vibrancy and vitality of the town centre.</p> <p>As such the Council considers there may be a requirement for public car parking on this site, and this should be reflected in the allocated uses on the site. This is in line with London Plan Policy T6.3.</p> <p>Proposed Modifications</p> <p>In the requirements the following amendment should be made: ‘Re-provide the existing supermarket with limited car parking in line with London Plan standards to avoid a site that is dominated by surface car parking and sufficient associated parking.’</p> <p>In the development principles the following amendment should be made: ‘Improve pedestrian access to the site, and pedestrian links between the site and Harrow town centre. including use of the car park for linked trips.’</p>
Irene Ruskine	The Integrated Impact assessment for Site Allocations also confirms that the Tesco site performs less than sites which have been allocated lower heights and densities, with amber ratings (Minor Negative Effect) for PTAL, Distance from formal and informal Recreation Sites (parks, leisure centre etc), proximity to water course, proximity to preserved trees, proximity to locally listed buildings and Red ratings (significant negative effect) for Noise Pollution and Protected Views. The Tesco allocation is too high for its location.	<p>Tall buildings zones have been identified through an evidence-based approach and set out in policy and policies maps as required by the London Plan (2021), with the Harrow & Wealdstone Opportunity Area identified as the most sustainable and appropriate location for them. The study considered a range of criteria for identifying areas appropriate for tall buildings. Detailed policy requirements for tall buildings are set out in Policy GR4 Building Heights.</p> <p>No proposed modifications</p>
Rolfe Judd obo Tesco Stores Ltd	The Site is allocated within the 2013 Harrow and Wealdstone Area Action Plan as Site 11. The allocation proposed limited redevelopment for the retention and extension of the Tesco store along with new retail units and 14 new homes on the corner of Station Road and Hindes Road. This allocation was based on an unimplemented 2012 planning permission and represents a significant underutilisation of the site.	<p>Noted.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	The site is the subject of a major planning application (ref. PL/0693/24) which was validated on 11th April 2024 and will provide a new and improved Tesco store alongside 504 new homes. This is expected to be determined at committee in March 2024. A separate submission was also made to the April 2024 call for sites consultation running concurrently with the Regulation 18 consultation which informed site allocation OA7: Tesco Station Road.	
Rolfe Judd obo Tesco Stores Ltd	The list of allocated sites includes the Station Road Tesco under new allocation OA7, with an indicative capacity of 500 homes and a new supermarket. Tesco support the inclusion of this new site allocation and also welcomes the inclusion of the indicative capacity. The December 2024 NPPF introduces a new standard method for calculating housing need, meaning that Harrows housing requirements will increase substantially by 613 new homes per year from 1,516 to 2,294, so allowing a degree of flexibility can help meet these increased requirements, assuming other planning matters are adequately addressed.	Noted. No proposed modifications
RAF Northolt	Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.	Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations. No proposed modifications

Allocation OA8 – Former Royal Mail Sorting Office, Elmgrove Rd

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Spring Planning obo Harrow Troy Ltd	The site allocation notes that the 'Site Objective' is - <i>'Redevelopment to retain and enhance industrial/employment floorspace on the site with potential for co-location with residential on the upper floors'</i> As detailed in the Call for Sites submission the redevelopment of the site would support the introduction of residential accommodation. Having regard to the 'Development Principles' it is agreed that given the site's location within the Harrow & Wealdstone opportunity area and near the Harrow Town Centre it is suitable for a modest scale residential/industrial co-location development.	Noted. No proposed modifications
Spring Planning obo Harrow Troy Ltd	The allocation suggests the reprovision of appropriate industrial employment space on the ground floor of development with an indicative residential capacity (C3) of 18 (housing contribution 20). It is considered that the extent of the site presents a greater opportunity to support both the local and national housing need and that whilst indicative, 18 residential units would not make effective or efficient use of the available site. Under new planning rules, updated via the National Planning Policy Framework (NPPF), councils are required to play their part in meeting housing need by reaching a new ambitious combined target of 370,000 homes a year. The new NPPF has had significant implications on housing targets and outlines a new target of 2294 new homes within LB Harrow. The Prime Minister and Secretary of State for Housing have been honest about the scale of the housing crisis with the Government now being 'mission-led', taking the bold and decisive action needed to do what it takes to build 1.5 million new homes over the next five years. It is considered that any development should seek to fully utilise the economic viability of the site with a view to maximising capacity, this would ensure that the project was financially viable whilst better supporting the Council in meeting its housing targets. As detailed at paragraph 73 of the NPPF <i>'Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly'</i> . The number of units this site can accommodate should therefore be reviewed and maximised to make the best use of the site. Having been considered suitable for a mixed use/residential scheme a future development would also be achievable as the site remains immediately available and could deliver housing within the next five years.	Development capacities have been identified through the undertaking of design-led capacity assessment of each site allocation [following guidance set out in the Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023)]. The Council considers represents an appropriate method of identifying capacities within the Plan. Further design work through the planning application stages will help to refine the capacity of each site as greater detail is added. The new NPPF2024 does not have direct implications for housing targets as it is intended the Plan will be examined under the NPPF 2023 and the housing target for the borough / draft Plan is set by the London Plan. No proposed modifications

Spring Planning obo Harrow Troy Ltd	<p>Whilst it is noted that the non-designated industrial sites makes an important contribution to employment and industrial land supply in Harrow and London and that a sufficient provision of appropriate employment land is provided, maintaining this former and existing use (industrial floorspace) in part on the ground floor would need to be carefully considered. The existing uses on the site are appropriate in a residential area. It would be necessary to ensure that the associated activities can be accommodated alongside residential units, mitigating any associated impacts in order to maintain residential amenity.</p> <p>A detailed design process would consider the access and amenity of surrounding properties. The wider area surrounding the site is characterised by a mix of uses so it is considered that a suitable design would mitigate any potential impacts. The residential developments of Havilland and Watson House are situated to the west of the site and there are further residential dwellings located to the south. The Crystal Centre is located to the northeast of the site and provides light industrial and retail warehousing units.</p>	<p>Noted. These considerations are reflected in the development principles of the allocation.</p> <p>No proposed modifications</p>
RAF Northolt	<p>Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.</p>	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations.</p> <p>No proposed modifications</p>

Allocation OA9 – Poet's Corner & Milton Rd

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Thames Water	On the information provided, modelling will be required, and it is anticipated that upgrades to network will be necessary	<p>Noted.</p> <p>No proposed modifications</p>
Environment Agency	We believe using the term " <i>Flood zone (Surface Water) 3a</i> " is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	<p>Proposed Modification:</p> <p>Replace Flood zone (Surface Water) 3a with:</p> <p><u>Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.</u></p>
RAF Northolt	Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations.</p> <p>No proposed modifications</p>

Allocation OA10 – Wealdstone Probation Office

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Hema Shah	No information in comment made (blank)	<p>None.</p> <p>No proposed modifications</p>
Mayor of London	The allocation is currently designated LSIS and as such it should be made clear that current industrial capacity should at least be maintained or intensified. One way of doing this would be to set out the current baseline industrial floorspace capacity so that it can be monitored. As the intention is to co-locate industrial with residential development, reference to the agent of	Reference to the agent of change is already in the policy. Monitoring / baselines are considered a separate process to site allocations.

	change principle should be made clear so that industrial activities can take place effectively without causing nuisance to future residents.	No proposed modifications
Environment Agency	We believe using the term “ <i>Flood zone (Surface Water) 3a</i> ” is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Proposed Modification: Replace Flood-zone (Surface Water) 3a with: <u>The site is at medium risk of surface water flooding, particularly along the south east of the site.</u> <u>Development should be directed away from the south east of the site where there is higher risk of surface water flooding.</u>
RAF Northolt	Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily	Noted, reference has been made to the RAF safeguarding zone in the Allocations’ Planning Considerations. No proposed modifications

Allocation OA11 – Car Park, Ellen Webb Drive

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	The site has a PTAL of up to 6a and is within Harrow and Wealdstone Opportunity Area and so there should be no car parking associated with any development. The requirement ‘ Appropriate car parking provision ’ should be deleted. In the development principles the following amendment should be made : ‘ Car free development except for disabled persons’ or operational parking requirements Car parking on site must be provided to serve any new development with care taken...’	The Council agrees that the parking requirement for the new uses on the site should be restricted in line with the London Plan’s parking standards and Policy M2 of this Plan, other than for disabled users, due to the good PTAL in line with Policy M2. There is however, a need to ensure a sufficiency of convenient public car parking to support the role of the District centre.
Savills obo Solum	Following discussion with relevant rail organisations there is no longer a requirement to re-provide station car parking at the site. This should be deleted from the allocation requirements. Station car parking will continue to be provided at the primary station car park on Sandridge Close. Any new development is expected to be ‘car free’ (bar the provision of an appropriate number of disabled persons car parking). Given the above this aspect of the allocation should be changed to omit the following: Appropriate car parking provision Car free development (bar disabled persons car parking) Improvements to public realm along Ellen Webb Drive, specifically towards Harrow & Wealdstone Station and Wealdstone High Street. Drainage and flood risk improvements, specifically to the western end of the site and within the adjoining public realm.	It is considered that this site currently offers public town centre car parking that underpins trips to the centre from areas not well served by public transport, thereby underpinning the vibrancy and vitality of the town centre. As such the Council considers there may be a requirement for public car parking on this site, and this should be reflected in the allocated uses on the site. This is in line with London Plan Policy T6.3. Proposed Modifications The requirement ‘Appropriate car parking provision’ should be deleted.

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>In the development principles the following amendment should be made : ‘Car free development except for disabled persons’ or operational parking requirements Carparking on site must be provided to serve any new development with care taken...’</p>
Savills obo Solum	<p>Following discussion with relevant rail organisations there is no longer a requirement to re-provide station car parking. This should be deleted from the allocation ‘Development principles’. Station car parking will continue to be provided at the primary station car park on Sandridge Close.</p>	<p>Noted. It is however noted that the site has historically also served the town centre.</p> <p>No proposed modifications</p>
Savills obo Solum	<p>The site is currently vacant. The site historically comprised of two parts: 61 at grade station car parking spaces in the southern part of the site associated with Harrow & Wealdstone Station); and an area of hard standing in the northern part of the site which was used by Network Rail as a compound on an ad hoc basis. This site is now fenced and locked. The ‘Description’ part of the allocation should be updated to reflect the above.</p>	<p>Agreed.</p> <p>Modification proposed:</p> <p>Change current use to vacant.</p>
Savills obo Solum	<p>Solum’s current intention is to pursue a major residential-led scheme on the site. Whilst Solum has no objection to the site allocation also referring to a hotel use at the site, such a use is unlikely to be provided at the site and the allocation should not require a hotel use to also be provided at the site if not desired.</p> <p>Appropriate town centre uses should also not be restricted to the ground floor. Subject to the design of the development there are situations where such uses could successfully be provided at first floor level, or across both ground and first floor levels. Whilst it is acknowledged that such uses would help to activate Ellen Webb Drive, the residential element of the development could also activate Ellen Webb Drive through entrances and communal spaces.</p> <p>Given all of the above, this aspect of the allocation should be changed to the following: <i>Major residential-led mixed-use development with appropriate town centre uses and improvements to public realm locally.</i></p>	<p>The site objective is for residential or hotel use. The site is a narrow, rail-proximate site, and therefore challenging for the design of high amenity residential. There is an identified need for hotel use in the borough and London generally and this site may contribute to meeting that need.</p>
Savills obo Solum	<p>As mentioned above, Solum’s current intention is to pursue a major residential-led scheme on the site. Whilst Solum has no objection to the site allocation also referring to a hotel use at the site, such a use is unlikely to be provided at the site and the allocation should not require a hotel use to also be provided at the site if not desired. The residential use should be the leading land use and a hotel use should be an alternative land use.</p> <p>We note that Criteria f of draft Policy HO9 (Large-Scale Purpose-Built Shared Living) currently states that: <i>“Proposals on sites with extant permission or allocated for self-contained dwellings will not be supported to avoid compromising the delivery of conventional housing to address future needs and targets, unless adequate evidence is submitted to demonstrate viability issues”</i></p> <p>The draft allocation of the site includes self-contained dwellings. Based on the current wording of Policy HO9, LSPBSL accommodation would not be supported on the site. However, we understand that LSPBSL accommodation at the site is supported by officers at the Council in principle, and that the inclusion of ‘or equivalent’ within the ‘Indicative capacity’ part of the draft allocation is intended to cater for this. However, we do not think that this is a sound approach as it is unclear and is open to misinterpretation. LSPBSL should therefore be explicitly referred to within the allocation.</p> <p>To support the allowance for LSPBSL at the site Solum has commissioned a piece of research which supports LSPBSL at the site. This report is enclosed with this letter. This concludes that there is a need for such accommodation in the area. The site is well placed for such accommodation being located in a highly accessible location near to Harrow & Wealdstone Station and Wealdstone High Street.</p>	<p>The site objective is for residential or hotel use. The site is a narrow, rail-proximate site, and therefore challenging for the design of high amenity residential. There is an outstanding need for hotel use in the borough and this site may be suitable to help meet that need.</p> <p>The Council’s housing need evidence does not identify a significant unmet need for co-living housing.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>Following discussion with relevant rail organisations there is also no longer a requirement to re-provide station car parking at the site. This should be deleted from the 'Allocated use'. Station car parking will continue to be provided at the primary station car park on Sandridge Close.</p> <p>Given all of the above, this aspect of the allocation should be changed to the following:</p> <p>Leading land use Residential (including Large-Scale Purpose-Built Shared Living Accommodation) Hotel</p> <p>Alternative land use Hotel</p> <p>Supporting land use(s) Appropriate town centre uses Reprovision of car parking spaces</p>	
Savills obo Solum	<p>This aspect of the allocation should be changed to the following to reflect Solum's development programme for the site: 0-5 years</p>	<p>Generally only sites with extant planning permission will be included in the 1-5 year period.</p> <p>No proposed modifications</p>
Savills obo Solum	<p>The 'Indicative capacity' of the site for C3 dwellings should be increased to 200 to encourage this highly accessible previously developed site being optimised to help in addressing the Borough's (and London's) housing need. There should also be a corresponding increase in the number of C1 hotel rooms to 300.</p> <p>As mentioned above, there is clear evidence that LSPBSL is appropriate at the site and should also be mentioned in the 'Indicative capacity'.</p> <p>Given the above, this aspect of the allocation should be changed to the following: <i>200 C3 dwellings, or 400 Large-Scale Purpose-Built Shared Living Accommodation, or 300 C1 hotel rooms, or an equivalent mix of the three</i></p>	<p>Development capacities have been identified through the undertaking of design-led capacity assessment of each site allocation [following guidance set out in the Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023)]. The Council considers represents an appropriate method of identifying capacities within the Plan. Further design work through the planning application stages will help to refine the capacity of each site as greater detail is added.</p> <p>No proposed modifications</p>
Savills obo Solum	<p>The majority of future pedestrian trips to / from the site are likely to be east and southeast to Wealdstone High Street and Harrow & Wealdstone Station respectively. Improvements to the Headstone Drive railway underpass should not form part of this allocation. It is not required to mitigate against the impact of the development. Reference to this should be deleted from this part of the allocation. The requirement for a large amount of public realm improvements is likely to impact the viability of any development and the provision of affordable housing.</p>	<p>Design of the site should help facilitate improvements to the underpass given it adjoins and a significant proportion of pedestrians and cyclists using the underpass would travel along the site's frontage.</p> <p>No proposed modifications</p>
Environment Agency	<p>We believe using the term "Flood zone (Surface Water) 3a" is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Proposed Modification:</p> <p>Replace Flood zone (Surface Water) 3a with:</p> <p>The site is at high risk of surface water flooding, particularly in the northwest of the site. The intersection of Ellen Webb Drive and Headstone Drive, is at high risk of surface water flooding.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		Development should be directed away from the west side of the site where there is higher risk of surface water flooding.
RAF Northolt	Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.	Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations. No proposed modifications

Allocation OAI2 – Peel Rd

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Lata Gandhi	Considers the Policy to be sound.	Noted. No proposed modifications
Historic England	Add references to development contributing to protecting and enhancing the significance of The locally listed Byron Recreation Ground - OA12, OA13, and OA14.	Noted Proposed Modification: Additional Development Principal: Development should contribute to protecting and enhancing the significance of the locally listed Byron Recreation Ground.
TfL	The site has a PTAL of up to 6a and is within Harrow and Wealdstone Opportunity Area and so there should be no car parking associated with any development. The allocated use ' Car parking ' should be deleted. The requirement ' Reprovision of appropriate level of car parking ' should be deleted. In the development principles the following amendment should be made: ' Car free development except for disabled persons' or operational parking requirements. Any public car parking will need to be justified, taking into account the existing supply of district centre car parking. Carparking will continue to be required at a level that is supportive of both any new development and for the Wealdstone District Centre. New development will have to demonstrate an appropriate level of carparking. '	It is noted that there is no requirement for operational car parking, other than for disabled users, due to the good PTAL in line with Policy M2. There is however, a need to ensure a sufficiency of convenient public car parking to support the role of the District centre. It is considered that as this site currently offers public town centre car parking that underpins trips to the centre from areas not well served by public transport. The retention of public car parking within the centre is important for the centre's vitality and viability. As such the Council considers there may be a requirement for public car parking on this site. The Council agree that the parking requirement for the new uses on the site should be restricted in line with the London Plan's parking standards and Policy M2 of this Plan. Proposed Modification

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>The allocated use ‘Car parking’ should be deleted.</p> <p>The requirement ‘Reprovision of appropriate level of car parking’ should be deleted.</p> <p>In the development principles the following amendment should be made: ‘<u>Car free development except for disabled persons’ or operational parking requirements. Any public car parking will need to be justified, taking into account the existing supply of district centre car parking. Carparking will continue to be required at a level that is supportive of both any new development and for the Wealdstone District Centre. New development will have to demonstrate an appropriate level of carparking.</u>’</p>

Allocation OA13 – Travis Perkins Wealdstone

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Mayor of London	<p>Both allocations are currently designated LSIS and as such it should be made clear that current industrial capacity should at least be maintained or intensified.</p> <p>One way of doing this would be to set out the current baseline industrial floorspace capacity so that it can be monitored. As the intention is to co-locate industrial with residential development, reference to the agent of change principle should be made clear so that industrial activities can take place effectively without causing nuisance to future residents.</p>	<p>Noted. These points are considered in the site allocation and associated Policy LR3: Industrial Land.</p> <p>No proposed modifications</p>
Historic England	Add references to development contributing to protecting and enhancing the significance of The locally listed Byron Recreation Ground - OA12, OA13, and OA14.	<p>Noted</p> <p>Proposed Modification:</p> <p>Additional Development Principal:</p> <p>Development should contribute to protecting and enhancing the significance of the locally listed Byron Recreation Ground.</p>
Third Revolution Projects for Kozy Living	We strongly object to the statement in OA13 regarding using compulsory purchase powers where appropriate. This is a negative approach and is contrary to positive plan making. It is evident from government guidance on this matter that a CPO should be a last resort as it is a mechanism for acquiring land without the consent of the owner. There is no evidence that a CPO would be necessary – an alternative approach would be to state that if parcels within the allocation come forward separately, they need to demonstrate that they would not fetter the rest of the site coming forward for development. If the Inspector does agree with the Council that it reasonable to cross refer to CPO powers, then reference to the use of CPO is already set out within emerging policy GR12 (Site Allocations) and does not need repeating in OA13.	<p>Noted and agreed.</p> <p>Proposed Modification:</p> <p>The Council will support site assembly of the properties noted within the allocation, and give due consideration to a Compulsory Purchase Order where appropriate.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>Our client’s site could come forward in its own right and this option should be considered by the Council. This would be a justified approach which would enable this part of the site to be delivered at the earliest opportunity, without delay, providing a boost to the Council’s housing delivery before the 6-10 year period currently envisaged in the emerging policy.</p> <p>Any proposal by our client which takes forward a smaller part of the site than the entire allocation would be set within the context of a site-wide masterplan which would demonstrate how an individual proposal would not fetter the rest of the site from coming forward in a way which complies with the overall aims for the allocation. As set out above, the policy should reference a requirement for the landowners to work together to prepare a holistic masterplan for the entire site - this would obviate any need for a CPO and would be a justified and effective approach which would accord with the tests of soundness set out in paragraph 36 of the NPPF. Any individual application could therefore be assessed in terms of conformity with the site masterplan.</p>	
Third Revolution Projects for Kozy Living	<p>Approach to Industrial Land</p> <p>We note that the site is located within a Locally Significant Industrial Site. This is a local designation. However, the current use of the site is industrial (B2) and Sui Generis. It is used for a car yard including sales and repairs. As discussed earlier in this response, the site lies within the Harrow and Wealdstone Opportunity Area. There is an associated Area Action Plan (AAP) for this area which sets out that one element of the borough’s spatial strategy is “changing the land use mix’ to include more residential, more smaller businesses, less industrial activity, more open space (para 3.18). Another element is “consolidation” of industrial areas and mixed use development of sites no longer suited for these uses.</p> <p>It is relevant that the existing employment space at the site generates a very low amount of employment given its size: just six FTE employees work across the entire site. This is partially because the site is used as a car yard and a large percentage of the site is taken up by storage space for vehicles in association with the car sales use. The majority of the site is in practice therefore in ‘vehicle sales’ use (generally considered to be sui generis rather than industrial) rather than a traditional industrial use. The remainder of the site is in vehicle repair / maintenance use.</p> <p>Although the proposed development will result in the change of use of the existing employment uses at the site, high-quality replacement employment-generating space will be provided at ground floor level to mitigate the loss of the existing employment space. It is envisaged that this new space, combined with the new employees who will be required to manage and service the co-living element of the use, will lead to considerably greater employment generation on the site compared to the existing use. Additionally the scheme can make provision for co-working opportunities. This accords with the findings of the West London Employment Study of 2022 which concluded that existing industrial spaces should be protected and that there should be renewal and provision of new quality spaces where possible.</p> <p>It is evident that there is potential for the employment yield of the site to increase through the redevelopment of the site. The scheme for our client’s site which is currently at pre-application stage now shows 410 sqm light industrial use on the ground floor, the end use of this could be managed by a future planning condition to ensure that it is compatible with the rest of the proposal.</p> <p>The local plan is the time to consider whether sites are currently in the most appropriate use and to re-allocate sites accordingly. We question whether the site is correctly designated as a LSIS when there are only 6 employees and it is in sui generis use. Additionally, the Council’s latest schedule of industrial sites shows 42 vacant units (September 2024) which is a considerable quantum which does not indicate an urgent need to protect existing sites for industrial uses. The Council should be mindful of the London Plan policy that states that “Where industrial land vacancy rates are currently above the London average, Boroughs are encouraged to assess whether the release of industrial land for alternative uses is more appropriate.....”.</p>	<p>Car-related uses such as repairs are appropriate on LSIS-designated land.</p> <p>The aim of the LSIS designation is not to maximise employment (job) density, but to provide spaces for industrial uses, which underpin the economic ecosystem of London to continue to operate. The Area Action Plan (to be superseded by the new Local Plan) was prepared in the context of the London Plan 2011 where the emphasis was on employment (job) density whereas the London Plan 2021 is focused on safeguarding floorspace, based on the evidence base underpinning it.</p> <p>It is considered that seeking the re-provision of industrial space on the site is appropriate.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>The current wording of OA13 states that any redevelopment of the site should prioritise the re-provision of appropriate industrial floorspace at the site – ‘ensuring minimal reduction of the employment offer’. However, limiting this to industrial floorspace is overly restrictive and not justified by the current evidence on demand. The current wording is therefore unsound. Changing the wording to refer to the appropriate re-provision of appropriate employment generation at the site would be a more effective response to the evidence and would assist in meeting the tests of soundness.</p>	
Third Revolution Projects for Kozy Living	<p>We also note that, given the highly sustainable location, the site is ideally located for co-living uses.</p> <p>We note that there is support for colocation on LSIS sites set out within the Council’s West London Employment Land Review from 2022. Within this document colocation in these locations is described as a “nascent market” with scope for further innovation to support genuine colocation. This is supported by policy E7B of the London Plan.</p>	<p>The Council’s housing need evidence does not identify a significant unmet need for co-living housing.</p> <p>The site allocation supports co-location, with industry the leading use and residential a supporting use.</p> <p>No proposed modifications</p>
Third Revolution Projects for Kozy Living	<p>We welcome the reference to the support for part of the site coming forward for some tall building development as set out within the Harrow and Wealdstone Opportunity Area Tall Building Study (2004). Our client’s site is within an area considered to be suitable for taller development for a number of reasons including the following:</p> <ul style="list-style-type: none"> • Within Harrow and Wealdstone Opportunity Area • Within an Area of Intensification in the Harrow and Wealdstone Area Action Plan • In close proximity to a town centre • Highly accessible to public transport and on a strategic movement corridor (over 9m in width) • In close proximity to existing tall buildings located immediately to the south, suggesting sustainable location in terms of strong relationship between existing building heights • Heritage sensitivity in immediate vicinity is limited 	<p>Tall buildings zones have been identified through an evidence-based approach and set out in policy and policies maps as required by the London Plan (2021), with the Harrow & Wealdstone Opportunity Area identified as the most sustainable and appropriate location for them. The study considered a range of criteria for identifying areas appropriate for tall buildings. Detailed policy requirements for tall buildings are set out in Policy GR4 Building Heights.</p> <p>No proposed modifications</p>
Third Revolution Projects for Kozy Living	<p>Residential Capacity</p> <p>We disagree with the indicative residential capacity expressed within the policy (36 C3 dwelling houses/units or equivalent). This is too restrictive. Additionally it is not justified by the evidence. There are a range of factors which support higher density development on the site as set out elsewhere in this response. These focus around the sustainability of the location – and the fact that it is previously developed and in a location assessed as suitable for tall buildings.</p> <p>Government policy within the NPPF is clear (para 124) that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses. Substantial weight is given to doing this in a way that makes as much use as possible of previously developed land. Additionally, para 129 of the NPPF stresses the need for development to make efficient use of land.</p> <p>Para 130 a) states that in town centres and other locations that are well served by public transport higher densities should be sought (unless there are strong reasons why this would be inappropriate). There is support for this elsewhere in the emerging plan - Strategic Policy 01: High Quality Growth states that the HWOA can accommodate higher density development. Strategic Policy 03: Meeting Harrow’s Housing Needs states that the Council will optimise opportunities to deliver housing in the Borough – within the most sustainable locations. There therefore appears to be some internal inconsistency within the emerging plan in its current form in this regard.</p> <p>It is unclear why the indicative capacity has been set at 36. The site can, in part, accommodate tall buildings and 36 units is unnecessarily restrictive and negative. The site could make a stronger contribution to meeting the Council’s housing requirement in this highly sustainable location. The policy is therefore unsound in this regard.</p>	<p>Development capacities have been identified through the undertaking of design-led capacity assessment of each site allocation [following guidance set out in the Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023)]. The Council considers represents an appropriate method of identifying capacities within the Plan. Further design work through the planning application stages will help to refine the capacity of each site as greater detail is added.</p> <p>No proposed modifications</p>
Environment Agency	<p>As there is FZ3a and 2 to the west of the site, you should keep development towards the east of the site where it is FZ1. A Flood Risk Assessment (FRA) will need to be submitted as part of this development.</p>	<p>Noted.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		No proposed modifications

Allocation OAI4 – Byron Quarter

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Donal Grey	It is the first time I have seen mentioned a feasibility study to relocate the leisure centre. With the thousands of new homes in Wealdstone I am amazed this would be considered - it is a very accessible and popular location and is consistent with Byron recreation ground being a hub for recreational activities....losing it would be a disaster for the local area.	Noted. The site objective is for the redevelopment of the site to fund a new leisure centre. The site can also make an important contribution to meeting local development needs. No proposed modifications
Thames Water	On the information provided, modelling will be required, and it is anticipated that upgrades to network will be necessary	Noted. No proposed modifications
Environment Agency	We believe using the term “ <i>Flood zone (Surface Water) 3a</i> ” is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Proposed Modification: Replace Flood zone (Surface Water) 3a with: Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.
Grace Faure-Bryan	The area is already densely populated another development would put a strain on the limited resources facilities.	The Council considers the Opportunity Area to be the most sustainable location in the borough to accommodate new development; this is reflected in its identification as an Opportunity Area in the London Plan. There is significant need for new housing, and it is appropriate that the most sustainable areas within the borough are fully explored for optimal capacity. This has been done through design-led capacity testing. It is a sustainable decision to locate growth in an area rich in public transport, jobs, and services. No proposed modifications
Historic England	Add references to development contributing to protecting and enhancing the significance of The locally listed Byron Recreation Ground - OA12, OA13, and OA14.	Noted Proposed Modification: Additional Development Principal: Development should contribute to protecting and enhancing the significance of the locally listed Byron Recreation Ground.

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	<p>The site has a PTAL of up to 4 and is within Harrow and Wealdstone Opportunity Area and so there should be a limited amount of car parking associated with any development.</p> <p>The allocated use 'Car parking' should be deleted.</p> <p>The requirement 'Car parking re-provision' should be deleted.</p> <p>In the development principles the following amendment should be made: 'Sufficient A limited amount of car parking re-provision should be made within new development to service the Leisure Centre (if retained or re-provided on-site) and other leisure and community uses.'</p>	<p>It is noted that there is no requirement for operational car parking, other than for disabled users, due to the good PTAL in line with Policy M2. There is however, a need to ensure a sufficiency of convenient public car parking to support the strategic role of the new leisure centre (sub regional infrastructure).</p> <p>Proposed Modification:</p> <p>The allocated use 'Car parking' should be deleted.</p> <p>The requirement 'Car parking re-provision' should be deleted.</p> <p>In the development principles the following amendment should be made: 'Sufficient A limited amount of car parking re-provision should be made within new development to service the Leisure Centre (if retained or re-provided on-site) and other leisure and community uses.'</p>

Allocation OA15 – Iceland Wealdstone

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Environment Agency	<p>We believe using the term "<i>Flood zone (Surface Water) 3a</i>" is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Proposed Modification:</p> <p>Replace Flood zone (Surface Water) 3a with:</p> <p><u>The site is at high risk of surface water flooding, particularly along the centre of the site. High Street, at the east of the site, is at high risk of surface water flooding.</u></p> <p><u>Safe access and egress routes should be directed to the west of the site towards Wolseley Road where there is a lower risk of flooding. Development should be directed away from the central areas of the site where there is higher risk of surface water flooding.</u></p>

Allocation OA16 – Kodak

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Mayor of London	<p>The northern part of the site is currently designated as SIL. It is noted that the site is an allocation in the current Local Plan and that there has been a significant planning history in recent years. To be consistent with Policy E7 of the LP2021 it is important that the allocation sets out how, and if, the SIL boundary is to change. As set out in Policy E5(C) of the LP2021, non-industrial uses should not be located within SIL. If it is the intention to introduce non-industrial uses within the area designated as SIL the boundary will be required to change, resulting in either downgrading to LSIS or to non-designated industrial land. If SIL is to be lost, as a result of the proposed reconfiguration, LBH will need to establish how this is being replaced and how it affects the boroughs plans to meet industrial need.</p> <p>In addition, as the site is adjacent to SIL it should be clear that the introduction of non-industrial elements should not prevent or negatively impact the ability of industrial activity to take place. As set out in Policy E5D of the LP2021 residential development adjacent to SILs should be designed to ensure that existing or potential industrial activities in SIL are not compromised.</p>	<p>The Atlas of Change identifies the proposed consolidation of the former SIL designation to reflect the development of the site since the current AAP was adopted. The development and consolidation of the SIL is consistent with that envisaged by the AAP should the former Kodak Factor close, which it has. The consolidated area of SIL in the north of the site reflects this and has been developed in its entirety for B2/B8 uses.</p> <p>No proposed modifications</p>
NHS HuDU	<p>The Kodak site allocation, as drafted, requires a minimum floorspace for health of at least that already consented on the site, however, should this prove to be unaffordable for the NHS, or not the preferred option for increasing capacity when the site is brought forward then there should be a requirement for financial contributions to expand health facilities off site. The opportunity to include the flexibility to enable the provision of integrated neighbourhood space with other social infrastructure on an affordable and sustainable basis is welcomed. The NWL ICB is finalising its estate strategy and ongoing discussions with the Council are welcomed.</p>	<p>The Council will continue to work with the NHS to provide health services in the most appropriate manner.</p> <p>No proposed modifications</p>
Environment Agency	<p>We believe using the term “<i>Flood zone (Surface Water) 3a</i>” is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Proposed Modification:</p> <p>Replace Flood zone (Surface Water) 3a with:</p> <p>Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.</p>
L&Q	<p>It is highlighted that some redesign is required for Phases 2 – 5 of the L&Q development at Harrow View East, notably due to the requirement to include second staircases on those relevant parts of the approved schemes (i.e. buildings above 7 storeys and/or 18 metres). Any such redesign would require planning approval. In our view, there is also an opportunity to revisit some parts of the scheme design to optimise the provision of new housing. Our representations are provided in this context.</p>	<p>Noted.</p> <p>No proposed modifications</p>
L&Q	<p>Firstly, the allocation states that the capacity is for an indicative 2,407 homes, but that this figure is from April 2024 onwards. Therefore, the assumption is that this specifically excludes any homes delivered on site prior to April 2024, however the site allocation does not state anywhere how many homes that is.</p> <p>Additionally, we note that the Assessment of Pre-Submission Local Plan Sites prepared by SLR in October 2024 (part of the Council’s evidence base) highlights that the ‘<i>Allocation may increase number of homes slightly (at this stage assuming by 10-15%, focused in southern part of site)</i>’. As the site appraisal notes the current consent is for 2,326 homes, a 15% increase would equate to an indicative total 2,675 homes across the site allocation.</p> <p>The table at 11.21 of the draft Local Plan also indicates that the contribution to housing trajectory (i.e. future delivery) is 2,675. This conflicts with the indicative 2,407 home delivery from April 2024 as set out in the draft allocation wording itself.</p> <p>Given the above, it is critical that the site allocation clarifies the total site allocation housing number for the delivery of new homes from April 2024 (which it appears should be 2,675), and explicitly state how many homes has been delivered prior to April 2024.</p>	<p>Proposed Modification:</p> <p>Amend Indicative residential capacity to read:</p> <p>Before Plan period (before 1/4/21) – 452 units Pre-Adoption Period (1/4/21-1/4/26) – 1,514 units 2026-2031 5-Yr period – 1,690 units</p>
L&Q	<p>The aforementioned SLR site appraisal specifically highlights that the opportunity to increase site capacity lies within the southern part of the site (i.e. L&Q’s land at Development Zone A). It is important that this is translated into the site allocation. As</p>	<p>The IIA noted the location of known land-owner intentions to seek an intensification of the site.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	currently drafted, it could be assumed that any uplift could be shared across the site, which is not reflective of the location specific opportunity for uplift as identified in the SLR site appraisal.	<p>However, from a design-perspective, there may be scope for intensification on other parts of the site. It is therefore not considered necessary nor appropriate to identify specific locations for intensification. The capacity numbers in the allocation are indicative and can be exceeded if a design-led process justifies this through the grant of planning permission.</p> <p>No proposed modifications</p>
L&Q	The draft revised allocation states that NHS floorspace must be provided, with the quantum provided to be <i>'at least the minimum floorspace secured under application P/3671/18 and take into account any further intensification of the residential use of the site above that granted permission under the 2015 Outline permission (P/2165/15).'</i> It is highlighted that whilst L&Q is committed to providing a new healthcare facility commensurate to the facility already consented, it is unclear why an increase in floorspace would be necessary on this site. Moreover, it would be disproportionate to require the L&Q development (Development Zone A) to have to provide additional healthcare floorspace to as a result of additional homes delivered on other development zones of the allocation site.	<p>The existing permitted floorspace presents an appropriate starting point for the required health care provision.</p> <p>No proposed modifications</p>
L&Q	<p>Indicative residential capacity: 2407 2,675 additional C3 dwelling houses / units or equivalent (from April 2024). (TBC homes delivered prior to April 2024).</p> <p>Requirements: Intensification of existing phases where appropriate and for phases yet to be built out Development Zone A/southern part of site (where this can be appropriately achieved)</p> <p>Development principles:</p> <p>Kodak site is a large strategic development site within the borough and has had several planning applications covering the entire site. Whilst some phases have been completed, further phases are still being brought forward. Any opportunity to intensify either existing phases or phases yet to have commenced should address the requirements of existing permissions on the site. Whilst an uplift in residential units may be supported in Development Zone A (southern part of the site), this will only be where appropriate site requirements (listed above) and any necessary uplift in the quantum of supporting infrastructure and uses is also secured to ensure a mixed and balanced community.</p> <p>NHS floorspace must be provided onsite to assist in meeting the need for GP Surgeries and other health care floorspace within the Harrow and Wealdstone Opportunity Area. The quantum provided must be at least the minimum floorspace secured under application P/3671/18 and take into account any further intensification of the residential use of the site above that granted permission under the 2015 Outline permission (P/2165/15).</p>	<p>Suggested modifications noted and in the context of the comments above, modifications suggested as set out below.</p> <p>Proposed Modification:</p> <p>Amend Indicative residential capacity to read:</p> <p>Before Plan period (before 1/4/21) – 452 units Pre-Adoption Period (1/4/21-1/4/26) – 1,514 units 2026-2031 5-Yr period – 1,690 units</p>
Environment Agency	Historic photographic manufacturing sites represent a highly contaminative former use. This site will require detailed intrusive investigation to characterise any soil and groundwater contamination on site, and any development scheme will be required to fully establish the risks to controlled waters. Groundwater is particularly sensitive at this location as the site is located atop a Secondary A Bedrock Aquifer (Lambeth Group). Further information regarding photographic manufacturing sites can be found at https://webarchive.nationalarchives.gov.uk/ukgwa/20140328084622/http://publications.environment-agency.gov.uk/pdf/SCHO0195BJKX-e-e.pdf	<p>Noted.</p> <p>No proposed modifications</p>
Historic England	These are both sensitive site allocations as they are for tall buildings that are located near the grade I listed Headstone Manor, which is of group value with its scheduled predecessor, its grade II* listed barn and two other grade II listed buildings. It is important economically and socially as it now operates as a museum. Had development not already been in progress in accordance with a masterplan, HIAs would have been required to inform these site allocations. As it is, we advise that the sensitivity of these sites and the need to conserve and enhance significance of the manorial complex is set out in the development principles.	<p>Noted.</p> <p>Proposed Modification:</p> <p>Additional Development Principal:</p> <p>Development should contribute to protecting and enhancing the significance of Headstone Manor.</p>

Allocation OA17 – Former Kodak Administration Offices

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Mayor of London	Site allocation (OA17- Former Kodak Administration Offices) is located within SIL (0.47ha) and has been identified for co-location with non-industrial uses, specifically residential uses on the upper floors. The site is currently occupied by an office building which has been vacant since 2018. If it is LBH's intention to introduce residential uses at this site, it is suggested that the borough downgrade the designation to LSIS or remove the designation entirely.	<p>This suggested modification is considered to have merit, provided that the industrial floorspace can be retained. To this effect, modifying the SIL designation to LSIS would achieve this.</p> <p>Proposed modifications</p> <p>Amend the policies map / Atlas of Change to remove the site from Strategic Industrial Location (SIL) to Locally Significant Industrial Sites (LSIS).</p> <p>Amend Planning considerations in the Site allocation to refer to Locally Significant Industrial Site instead of Strategic Industrial Location</p>
Savills obo Dandi Living	We welcome that the site has been allocated as a potential site for development within the draft Local Plan.	<p>Noted.</p> <p>No proposed modifications</p>
Savills obo Dandi Living	under the 'Relevant Planning Applications' section, the reference number of the currently pending planning application is incorrectly stated as 'P/1154/24', which should be amended to read 'PL/1152/24'.	<p>Noted. Update the planning history.</p> <p>Proposed modification</p> <p>Amend Planning History as follows: P/1154/24 <u>P/1152/24</u></p>
Savills obo Dandi Living	<p>as previously stated, we believe that the Site's SIL designation should be removed. The SIL designation in this area only covers the Site and the larger active industrial area to the north and east of the former Kodak site.</p> <p>It is considered that the SIL designation likely covered the entirety of the Kodak site prior to the implementation of the Harrow View East masterplan, and as sites were developed within the area, the SIL designation has been removed from these areas, leaving the Site isolated in terms of its SIL designation. The Site is surrounded by residential buildings immediately to the north, west and east, and this makes its use for a significant number of industrial uses incredibly challenging in terms of impact on neighbouring residential amenity. This is supported by long period of marketing for a range of employment uses. Further, it should be considered that the Site was historically used as the administrative offices to the Kodak Factory, and therefore the Site was never in industrial use but rather in office use. The client is however amenable to providing a quantum of high-quality, flexible employment floorspace on the Site reflecting the current office use of the site, as set out in the current planning application. However, this needs to be underpinned and supported by residential or alternative uses to ensure any scheme for the site with replacement employment floorspace is deliverable.</p> <p>Any future site allocation should therefore seek to promote a mixed-use development encouraging flexible employment uses on site, and not set an overly restrictive requirement to provide industrial uses on the site, which would not be compatible and sympathetic with the immediate surrounding context of residential uses.</p>	<p>In the context of representation from the Mayor, this suggested modification is considered to have merit; see proposed modification above.</p> <p>No further proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	As such, it is considered that the SIL designation should be removed from the site and allocation, as such, within the 'Allocated Uses' section of the site allocation, the uses should be re-worded so that industrial use is not considered a 'leading' land use.	

Site Allocations – Other

Allocation GB1 – Royal National Orthopaedic Hospital

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Thames Water	On the information provided modelling may be required to understand the impact of development	Noted. No proposed modifications
Mayor of London	In the site allocations, two Green Belt sites have been identified for development. One of them is at Watling Farm and is for the 12 to 13 additional Gypsy and Traveller pitches required to meet identified need. The other site is the Royal National Orthopaedic Hospital (RNOH) and is allocated for the modernization and extension of the hospital as well as 500 new homes. Both sites are currently allocated in the adopted Local Plan and also have associated but lapsed planning permissions. As such, it is assumed that LBH may need to establish exceptional circumstances to justify the proposed developments in these allocations again.	Comments noted. Allocations should recognise the Very Special Circumstances will need to be demonstrated to justify inappropriate development. Suggested modification Add a requirement that development in the Green Belt will need to demonstrate very special circumstances.
CPRE	Any redevelopment of this site must be restricted to within the boundary of the existing developed area and there should be no development outside of these boundaries. The Green Belt within this site must be retained and protected as it is clearly connected to the wider Green Belt. Any loss of Green Belt on this site to new development would be inappropriate. Exceptional circumstances cannot be said to exist.	Development will be in accordance with NPPF (2023) requirements, and the Local Plan's Green Belt Policies. No proposed modifications
Environment Agency	We believe using the term " <i>Flood zone (Surface Water) 3a</i> " is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Proposed Modification: Replace Flood zone (Surface Water) 3a with: Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.
LB Barnet	The proposals at the Royal National Orthopaedic Hospital (RNOH) (Site Ref. GB1), Watling Farm (Site Ref. GB2) and Stanmore LU Station (Site Ref. O22) in particular could generate additional traffic on the A5, the A410 (Spur Road), the A41 (a TfL road) and place additional pressure on some already busy key junctions or on the M1. LB Barnet would generally resist anything requiring additional road capacity either on LB Barnet's roads – or on TfL or National Highways roads within the Borough either.	Noted, the Council will continue to work with LB Barnet to understand and address transport impacts from new development within both boroughs. No proposed modifications
LB Barnet	In regard to Site GB1 (RNOH), the proposal is for 347 - 500 C3 units and potentially development of research and / or innovation facilities associated with the hospital given its national and international stature. Most of the RNOH site has a PTAL of 1a; the area by the main gate has one of 1b. The western corner has one of zero. The main road access from the south is via Brockley Hill. The boundary with LB Barnet runs up the middle of the road so the Council would have a direct interest in any proposals as a local highway authority, including construction logistics, deliveries and parking. The modelling done for the Council's Local Plan Strategic Transport Assessment (pre-covid) shows both the A41 Edgware Way/A410	Noted, the Council will continue to work with LB Barnet to understand and address transport impacts from new development within both boroughs. No proposed modifications

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>Spur Road and the Canons Corner (A410 and A5 Brockley Hill) junctions at above 85% of capacity at both AM and PM peaks – the Brockley Hill one at more than 90%. LB Barnet is of the view that any development proposal would have to demonstrate that:</p> <ul style="list-style-type: none"> • It would not be heavily car-based given the low PTAL. Just the other side of the Hertfordshire border is an office park (Centennial Park) which is served by one bus and sits in acres of car parking which would not be acceptable in London Plan policy terms • It is accompanied by public transport options that makes the type and level of development sustainable. It's at the top of a very steep hill which probably limits the attractiveness of active travel. This would have to be more than simply funding a bus for a finite period; this has been tried in the past for the RNOH and when the funding ran out so did the buses. • Any access from Brockley Hill works in highways terms. • It – combined with additional demand from the allocated site proposals for Watling Farm and Stanmore Station car park - would not take the two junctions in LB Barnet over capacity. The Head of Transport Strategy is of the view there is probably limited scope for increasing the capacity of Canons Corner as there seems little spare space, • It would require capacity enhancements on the A41 or M1(although these are not LB Barnet's roads, Barnet would not want to see any enhancements in our area to enable this development). National Highways are already looking at capacity on the A1, to the east of this site, in light of the growth planned in Hertsmer. <p>The proposals would have to consider taking into account the development proposed in Hertsmer.</p>	
RAF Northolt	Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an Environment attractive to hazardous bird species to be formed temporarily.	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations.</p> <p>No proposed modifications</p>
Environment Agency	Development on historic landfills may require an Environmental Permit for the reuse of site material and/or the deposition of waste for recovery activities. Developers for these sites would need to make enquires regarding potential requirements under the Environmental Permitting Regulations 2016.	<p>Noted.</p> <p>No proposed modifications</p>
National Highways	Based upon the types, locations, parking policies and distance from the SRN, plus historic low levels of commuting from Harrow to locations outside of London by car, we are content that further assessment of the transport implications of the Local Plan is not required. The exception is the allocation of 500 homes at the Royal National Orthopaedic Hospital site, located approximately 1km to the southwest of M1 Junction 4. We are content that any impacts from this site can be covered under a future planning application.	<p>Noted.</p> <p>No proposed modifications</p>
Historic England	This is a particularly sensitive site allocation in historic environment terms as it contains part of the scheduled remains of Brockley Hill Romano-British pottery and settlement, an ephemeral site that may extend beyond the scheduled boundaries. We advise that the development principles for this site are strengthened to acknowledge this archaeological sensitivity and to highlight that the application will need to be supported by an archaeological desk-based assessment. Early consultation with Historic England and the Greater London Archaeological Advisory Service should also be recommended, as a phased programme of investigation (potentially including pre-application evaluation) is likely to be required for any non-designated archaeological remains. However, the applicant should bear in mind that there is a presumption in favour of archaeological remains being preserved in-situ, and the more important the weight the greater the presumption. In line with policy HE1, the council should ensure that the development secures production of a conservation management plan (CMP) for the whole of the scheduled site and that its management is guided by this. The CMP/development should also seek to secure improved access / interpretation of the scheduled remains within the site boundary.	<p>Noted.</p> <p>Proposed modification:</p> <p>Add a new Development principle as follows: <u>Planning application will need to be supported by an archaeological desk-based assessment.</u></p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	We would also query whether community infrastructure money from the development could be used to help address the council owned at-risk status of the scheduled linear earthworks in Pear Wood, just southeast of GB1. This site would benefit from a CMP, vegetation management and monitoring. It is also likely to have the potential for improved access/interpretation.	

Allocation GB2 – Watling Farm

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
CPRE	<p>We support fair and equal treatment for gypsy and traveller communities that facilitates and supports their traditional and nomadic way of life. We also recognise that the Council has a duty to provide pitches and plots for these communities in the Harrow local authority area, in line with national Government policy. However, we strongly object to the inclusion of Green Belt as site allocations for delivery of Gypsy and traveller pitches. We urge the Council to explore alternative sites on the borough's plentiful supply of previously developed brownfield land.</p> <p>The Government's planning policy for traveller sites clearly states that "Traveller sites (temporary or permanent) in the Green Belt are inappropriate development".</p>	<p>Development will be in accordance with NPPF (2023) requirements, and the Local Plan's Green Belt Policies.</p> <p>No proposed modifications</p>
Environment Agency	We believe using the term " <i>Flood zone (Surface Water) 3a</i> " is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	<p>Proposed Modification:</p> <p>Replace Flood zone (Surface Water) 3a with:</p> <p><u>The site is at high risk of surface water flooding, particularly along the centre of the site. Watling Farm Close, at the centre of the site, is at high risk of surface water flooding.</u></p> <p><u>Watling Farm Close is at high risk of surface water flooding and is the only direct route out of the Farm. A safe 'haven' should be provided to the southeast of the site, where flood risk is not predicted.</u></p>
Mayor of London	In the site allocations, two Green Belt sites have been identified for development. One of them is at Watling Farm and is for the 12 to 13 additional Gypsy and Traveller pitches required to meet identified need. The other site is the Royal National Orthopaedic Hospital (RNOH) and is allocated for the modernization and extension of the hospital as well as 500 new homes. Both sites are currently allocated in the adopted Local Plan and also have associated but lapsed planning permissions. As such, it is assumed that LBH may need to establish exceptional circumstances to justify the proposed developments in these allocations again.	<p>Comments noted. Allocations should recognise the Very Special Circumstances will need to be demonstrated to justify inappropriate development.</p> <p>Suggested modification</p> <p>Add a requirement that development in the Green Belt will need to demonstrate very special circumstances.</p>
TfL	The site has a PTAL of up to 1a and there are very limited opportunities for active travel. It is not well located for residential development or access to services and is likely to result in a car dependent development. If the site allocation includes housing as proposed this should be located close to existing bus services on Brockley Hill. The following development principle should be amended as shown 'The Council recognises that the site is not located in a highly sustainable location, and therefore any new development must contribute to sustainable transport improvements including active travel routes and access to public transport to improve connectivity & support measures as set out in the Council's Long Term Transport Strategy and Local Implementation Plan.'	<p>Sustainable travel modes are broadly active and public transport modes, so this addition is unnecessary.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
LB Barnet	<p>In regard to Site GB2 (Watling Farm) the only access is from the A41. It's PTAL 1a and the only public transport is a bus from Centennial Park, which involves crossing the A41 to access.</p> <p>In reality the additional 10-11 pitches would be car-based (with business vehicles as well) and LB Barnet would need to be assured that this together with any increase in traffic from RNOH and growth in Hertsmere does not have the impacts on the junctions and the A41 mentioned earlier. LB Barnet would also want to see a holistic approach to public transport improvements to serve both these sites (GB1 and GB2).</p>	<p>Noted, the Council will support improved sustainable travel accessibility, as set out in the policy.</p> <p>No proposed modifications</p>
Historic England	Add references to development contributing to protecting and enhancing the significance of The Grade II listed Watling Farm – GB2	<p>Noted and agreed.</p> <p>Proposed Modification:</p> <p>Additional Development Principal:</p> <p>Development should contribute to protecting and enhancing the significance of the Locally The Grade II listed Watling Farm</p>
RAF Northolt	Development of, or exceeding, 45.7m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations.</p> <p>No proposed modifications</p>

Allocation O1 – Waitrose, South Harrow

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	<p>The site has a PTAL of 3 and is close to South Harrow bus and Underground stations and district centre so there should be a limited amount of car parking associated with any development.</p> <p>We note the requirement 'Appropriate level of replacement carparking'. Any car parking should be based on current London Plan standards and not historic provision.</p> <p>In the development principles the following amendment should be made to ensure consistency with the London Plan and to reflect the site's potential for a car free residential development taking account of the PTAL of 3 and the proximity to shops and services in South Harrow. 'An appropriate level of carparking in line with London Plan standards must be provided to continue to serve the Waitrose superstore and also for any residential development.'</p>	<p>Noted.</p> <p>Proposed Modification:</p> <p>An appropriate level of carparking in line with London Plan standards must be provided to continue to serve the Waitrose superstore and also for any residential development.'</p>
NHS HuDU	<p>We ask that the requirement in relation to the NHS floorspace for Site 01- Waitrose South Harrow is set out as for other site allocations where there is not an existing permission for health space or an existing health facility.</p> <p><i>Under 'Requirements' in 'Developer Contributions' NHS Floorspace</i> NHS floorspace (having regard to the identified need at the time and the delivery of NHS floorspace on other allocated sites)</p>	<p>Agree, amend for consistency.</p> <p>Proposed modifications</p> <p>Amend 'Requirements' as follows:</p> <p>NHS floorspace (having regard to the identified need at the time and the delivery of NHS floorspace on other allocated sites)</p>
Environment Agency	We believe using the term "Flood zone (Surface Water) 3a" is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	<p>Proposed Modification:</p> <p>Replace Flood zone (Surface Water) 3a with:</p>

		<p>The site is at high risk of surface water flooding, particularly along the south east of the site. Development should be directed away from the southern area of the site where there is higher risk of surface water flooding.</p> <p>Safe access and egress routes should be directed to the southeast corner of the site towards Northolt Road where there is a lower risk of flooding. Development should be directed away from the southern area of the site where there is higher risk of surface water flooding.</p>
RAF Northolt	Any development or change of land use will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations.</p> <p>No proposed modifications</p>

Allocation O2 – Roxeth Library & Clinic

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
RAF Northolt	Any development or change of land use will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations.</p> <p>No proposed modifications</p>

Allocation O3 – Northolt Rd Nursery & Car Park & R/o 27 Northolt Rd, South Harow

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	<p>The sites have a PTAL of 4 and are close to South Harrow bus and Underground stations and district centre so there should be a limited amount of car parking associated with any development.</p> <p>The requirement 'Provision of appropriate level of car parking' should be deleted as shown. Residential development in this location should be car free and any car parking associated with a re-provided nursery should be limited to disabled persons' parking or for operational needs.</p> <p>In the development principles the following should be deleted as shown because there should be no requirement in this location to retain, re-provide or relocate car parking 'Development of the car-park should be accompanied by an assessment of parking need which demonstrates that an appropriate level of parking is being retained, re-provided on site or relocated.'</p>	<p>The Council agree that the parking requirement for the new uses on the site should be restricted in line with the London Plan's parking standards and Policy M2 of this Plan, other than for disabled users, due to the good PTAL in line with Policy M2. There is however, a need to ensure a sufficiency of convenient public car parking to support the role of the Metropolitan town centre.</p> <p>It is considered that this site currently offers public town centre car parking that underpins trips to the centre from areas not well served by public transport, thereby underpinning the vibrancy and vitality of the town centre.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>As such the Council considers there may be a requirement for public car parking on this site, and this should be reflected in the allocated uses on the site. This is in line with London Plan Policy T6.3.</p> <p>Proposed Modification</p> <p>The requirement ‘Provision of appropriate level of car parking’ should be deleted as shown. Residential development in this location should be car free and any car parking associated with a re-provided nursery should be limited to disabled persons’ parking or for operational needs.</p> <p>In the development principles the following should be deleted as shown because there should be no requirement in this location to retain, re-provide or relocate car parking ‘Development of the car-park should be accompanied by an assessment of parking need which demonstrates that an appropriate level of parking is being retained, re-provided on-site or relocated.’</p>
Environment Agency	We believe using the term “ <i>Flood zone (Surface Water) 3a</i> ” is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	<p>Proposed Modification:</p> <p>Replace Flood zone (Surface Water) 3a with:</p> <p><u>Both sites are at high risk of surface water flooding, particularly along the west of the sites. The Car Park is at greater risk than the Children Centre. Northolt Road, to the west of the both sites, is at high risk of surface water flooding. Car Park - Safe access and egress routes should be directed to the northeast of the site towards Brigade Close where there is a lower risk of flooding. Children Centre - Safe access and egress routes should be directed to the east of the site towards Grange Road where there is a lower risk of flooding. Development should be directed away from the northwest side of the both sites where there is higher risk of surface water flooding.</u></p>
Historic England	Add references to development contributing to protecting and enhancing the significance of Locally listed British Legion Club – O3	Noted

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>Proposed Modification:</p> <p>Additional Development Principal:</p> <p>Development should contribute to protecting and enhancing the significance of the Locally listed British Legion Club.</p>
RAF Northolt	Any development or change of land use will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations.</p> <p>No proposed modifications</p>

Allocation O4 – Grange Farm

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
RAF Northolt	Any development or change of land use will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations.</p> <p>No proposed modifications</p>
Environment Agency	We believe using the term " <i>Flood zone (Surface Water) 3a</i> " is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	<p>Proposed Modification:</p> <p>Replace Flood zone (Surface Water) 3a with:</p> <p>Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.</p>

Allocation O5 – Harrow School Estate & John Lyon School

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Thames Water	Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet Harrow to discuss the wastewater infrastructure needs relating to the Local Plan.	<p>Noted.</p> <p>No proposed modifications</p>
Environment Agency	We believe using the term " <i>Flood zone (Surface Water) 3a</i> " is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	<p>Proposed Modification:</p> <p>Replace Flood zone (Surface Water) 3a with:</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.
RAF Northolt	Any development or change of land use will trigger statutory consultation requirement. Additionally encompasses different safeguarding criteria dependent on location. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily	Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations. No proposed modifications
JLS obo Harrow School	<p>Proposed allocation O5, covering both schools, is broadly welcomed by Harrow School, not least as it is noted that the site objective is to: Facilitate the continued maintenance and use of assets within the school estates, and development and change within the estate to strengthen the educational roles of the Harrow School and John Lyon School.</p> <p>It is also noted that the "allocated use" element of the allocation relates to: Refurbishment/redevelopment of school buildings, sports facilities and enhancement of playing fields</p> <p>However, in the context of previous representations and the foregoing commentary, it is requested that the "allocated use" element of the allocation be amended to: Refurbishment/redevelopment of school buildings, sports facilities and enhancement of playing fields, and other development which will support the ongoing operation and/or evolution/improvement of Harrow School or John Lyon School</p> <p>Evidently any development which is brought forward in the context of the allocation would need to be sensitively considered, in order to address matters such as heritage (the Harrow Area of Special Character, the Harrow on the Hill Conservation Areas, and Listed buildings) and MOL, but these are addressed by other policies in the New Local Plan and any allocation would not prejudice them.</p>	It is not considered necessary nor appropriate to add an undefined additional use to this site allocation. Any detailed proposal can be considered against the site allocation / overall plan should a planning application come forward. No proposed modifications
JLS obo Harrow School	It is noted that the local authority have confirmed that – as a result of the amendments proposed by the Local Plan – that none of the Sports and Sciences building will be in MOL. This is welcomed by the School.	Noted. No proposed modifications
JLS obo John Lyon School	<p>Proposed allocation O5, covering both schools, is broadly welcomed by John Lyon School, not least as it is noted that the site objective is to: Facilitate the continued maintenance and use of assets within the school estates, and development and change within the estate to strengthen the educational roles of the Harrow School and John Lyon School.</p> <p>It is also noted that the "allocated use" element of the allocation relates to: Refurbishment/redevelopment of school buildings, sports facilities and enhancement of playing fields...</p> <p>However, in the context of previous representations and the foregoing commentary, it is requested that the "allocated use" element of the allocation be amended to: Refurbishment/redevelopment of school buildings, sports facilities and enhancement of playing fields, and other development which will support the ongoing operation and/or evolution/improvement of Harrow School or John Lyon School</p> <p>Evidently any development which is brought forward in the context of the allocation would need to be sensitively considered, in order to address matters such as heritage (the Harrow Area of Special Character, the Harrow on the Hill Conservation Areas, and Listed buildings) and MOL, but these are addressed by other policies in the New Local Plan and any allocation would not prejudice them.</p>	It is not considered necessary nor appropriate to add an undefined additional use to this site allocation. Any detailed proposal can be considered against the site allocation / overall plan should a planning application come forward. No proposed modifications

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Rapeleys for Harrow School	<p>Harrow School was founded in 1572 under a Royal Charter granted by Queen Elizabeth I. It is located in a 120 hectare estate, encompassing much of Harrow on the Hill. As recognised by the New Local Plan, the Harrow School buildings are a key part of the special character of Harrow on the Hill. It also recognises that Harrow School is an asset which brings important social, cultural, economic and environmental benefits to the borough (Strategic Policy 02). Commentary supporting New Local Plan Policy LE5 also recognises the importance of Harrow School as a key tourist attraction in the Borough.</p> <p>In this context, and as previously confirmed in representations, it must be recognised that the benefits accruing from Harrow School, to the Borough, are that of a very long-standing, but vital and evolving educational establishment. As such, local planning policy should recognise that sensitive evolution, improvements and (if necessary) supporting development are key to the ongoing health and success of Harrow School, and the benefits it brings to the Borough. Such development can also provide opportunities for greater community access to Harrow School’s facilities, which generates additional planning benefits (particularly in the context of the Local Authority’s evidence base, which identifies a shortage of sporting and recreational facilities in the Borough). A prime example of this is the new Sports and Sciences development, currently under construction, which was supported by the Local Authority. Proposed allocation O5, covering both schools, is broadly welcomed by Harrow School, not least as it is noted that the site objective is to:</p> <p><i>facilitate the continued maintenance and use of assets within the school estates, and development and change within the estate to strengthen the educational roles of the Harrow School and John Lyon School.</i></p>	<p>It is not considered necessary nor appropriate to add an undefined additional use to this site allocation. Any detailed proposal can be considered against the site allocation / overall plan should a planning application come forward.</p> <p>No proposed modifications</p>
Rapeleys for Harrow School	<p>It is also noted that the “allocated use” element of the allocation relates to:</p> <p><i>Refurbishment/redevelopment of school buildings, sports facilities and enhancement of playing fields</i></p> <p>However, in the context of previous representations and the foregoing commentary, it is requested that the “allocated use” element of the allocation be amended to:</p> <p><i>Refurbishment/redevelopment of school buildings, sports facilities and enhancement of playing fields, and other development which will support the ongoing operation and/or evolution/improvement of Harrow School or John Lyon School</i></p> <p>Evidently any development which is brought forward in the context of the allocation would need to be sensitively considered, in order to address matters such as heritage (the Harrow Area of Special Character, the Harrow on the Hill Conservation Areas, and Listed buildings) and MOL, but these are addressed by other policies in the New Local Plan and any allocation would not prejudice them.</p>	<p>It is not considered necessary nor appropriate to add an undefined additional use to this site allocation. Any detailed proposal can be considered against the site allocation / overall plan should a planning application come forward.</p> <p>No proposed modifications</p>
Rapeleys for Harrow School	<p>Proposed changes to MOL</p> <p>It is noted that the local authority have confirmed that – as a result of the amendments proposed by the Local Plan – that none of the Sports and Sciences building will be in MOL. This is welcomed by the School.</p>	<p>Noted.</p> <p>No proposed modifications</p>
Historic England	<p>Including APAs, conservation areas, listed buildings, and a registered park and garden, this site allocation is extremely sensitive in historic environment terms. Not just in terms of the individual assets, but their contribution to the sense of place and local identity of both Harrow and Harrow School. We therefore welcome that this site allocation is supported by a Masterplan that constitutes supplementary planning guidance. However, we note that the masterplan is now nearly ten years old, and, in light of policy changes and intervening development, we advise that it is reviewed and updated to ensure that it sets out a positive strategy for the management of the of the historic environment.</p>	<p>Noted. Any need to update the master plan would be influenced by whether the School’s intentions have changed significantly since the master plan was adopted.</p> <p>No proposed modifications</p>

Allocation O6 – Brethren’s Meeting Hall, The Ridgeway

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Thames Water	Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority’s aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet Harrow to discuss the wastewater infrastructure needs relating to the Local Plan.	Noted. No proposed modifications
Environment Agency	We believe using the term “ <i>Flood zone (Surface Water) 3a</i> ” is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Proposed Modification: Replace Flood zone (Surface Water) 3a with: <u>The site is at high risk of surface water flooding, particularly along the southwest boundary / west side of the site. Safe access and egress routes should be directed towards The Ridgeway where there is a lower risk of flooding and road access. Development should be directed away from the south corner of the site where there is higher risk of surface water flooding.</u>
RAF Northolt	Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily	Noted, reference has been made to the RAF safeguarding zone in the Allocations’ Planning Considerations. No proposed modifications

Allocation O7 – Rayners Lane Station Car Park

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	The site is owned by TfL and so a separate response will be submitted by Places for London. The site has a PTAL of 4 - 5 and is adjacent to Rayners Lane Underground station and district centre so any development should be car free to ensure consistency with the London Plan. The site objective should be amended as follows: ‘Mixed-use development which improves access to Rayners Lane Station, while retaining or re-provided a sufficient level of car parking. ’ The allocated use ‘ Car parking ’ should be deleted as shown. The requirement ‘Re-provision of an appropriate level [of] station car-parking for disabled persons to help meet need generated by commuters and in connection with major events at Wembley Stadium. ’ should be amended as shown. In the development principles the following should be deleted as shown because there should be no requirement in this location to re-provide car parking. ‘ Any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the re-provision of car parking capacity on the site or elsewhere. ’	The Council agree that the parking requirement for the new uses on the site should be restricted in line with the London Plan’s parking standards and Policy M2 of this Plan, other than for disabled users, due to the good PTAL in line with Policy M2. There is however, a need to ensure a sufficiency of convenient public car parking to support the role of the District centre. It is considered that this site currently offers public town centre car parking that underpins trips to the centre from areas not well served by public transport, thereby underpinning the vibrancy and vitality of the town centre.

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>As such the Council considers there may be a requirement for public car parking on this site, and this should be reflected in the allocated uses on the site. This is in line with London Plan Policy T6.3.</p> <p>Proposed Modification</p> <p>The site objective should be amended as follows: ‘Mixed-use development which improves access to Rayners Lane Station, while retaining or re-provided a sufficient level of car parking.’</p> <p>The allocated use ‘Car parking’ should be deleted as shown.</p> <p>The requirement ‘Re-provision of an appropriate level [of] station car-parking for disabled persons to help meet need generated by commuters and in connection with major events at Wembley Stadium.’ should be amended as shown.</p> <p>In the development principles the following should be deleted as shown because there should be no requirement in this location to re-provide car parking. ‘Any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the re-provision of car parking capacity on the site or elsewhere.’</p>
Places for London	<p>We welcome the inclusion of this site allocation covering TfL / Places’ landholdings as well as Council-owned land to the west. However, there are a number of issues that render the draft SA to be undeliverable in its current form. Therefore the Plan would not be sound unless amendments are made.</p> <p>Site Boundary and Area The site boundary is incorrect; we do not propose to redevelop the single storey commercial fronting Alexandra Avenue. The correct red line boundary is below (and please see our ‘call for sites’ form for further information). The correct site area is 0.75 ha.</p>	<p>Noted, however and amendment of the boundary and site area is not considered necessary as the boundary simply reflects ownership.</p> <p>No proposed modifications</p>
Places for London	<p>Supporting (or Alternative) land use(s) Town centre uses (eastern part of site only) Class E / industrial / warehousing</p> <p>Our ‘call for sites’ form explains that at the present time it is not believed that housing development will be viable at this site. Therefore, alternative or complimentary uses should also be allocated in order that this underused site can be optimised and</p>	<p>The site is not appropriate for industrial given its context, but class E is appropriate.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	brought into use. Potentially the site may also be suitable for Class E and / or industrial / warehousing / logistics uses, either as an alternative to housing development, or as part of a housing-led, mixed-use scheme. The Council may wish to add reference to Transport Assessment, vehicle tracking and ‘agent of change’ principles to ensure that any impacts for local residents are addressed and mitigated.	
Places for London	<p>Allocated Use The “<i>leading land use</i>” for the correct site is specified as “<i>Residential, car parking</i>”. If this site is redeveloped as a housing opportunity, Places will not provide replacement car parking and therefore this reference should be deleted. We suggest that the ‘Allocated use’ is changed to:</p> <p>Leading land use Residential Limited replacement car parking with the aim to reprovide only where essential, for example for disabled persons or operational reasons</p> <p>This approach to car parking reflects the site’s highly accessible location and will encourage the use of public transport and active modes of travel. It is an approach to the development of station car park sites that has been accepted by the Local Plan Inspectors at the adjoining borough of Barnet. In addition, it is an approach accepted on appeal in respect of TfL car park development opportunities, as resulting in a significant reduction in local vehicular traffic and having an overall beneficial impact (eg. Arnos Grove, ref: APP/Q5300/W/21/ 3276466, paragraph 35).</p>	<p>The Council agree that the parking requirement for the new uses on the site should be restricted in line with the London Plan’s parking standards and Policy M2 of this Plan, other than for disabled users, due to the good PTAL in line with Policy M2. There is however, a need to ensure a sufficiency of convenient public car parking to support the role of the District centre.</p> <p>It is considered that this site currently offers public town centre car parking that underpins trips to the centre from areas not well served by public transport, thereby underpinning the vibrancy and vitality of the town centre.</p> <p>As such the Council considers there may be a requirement for public car parking on this site, and this should be reflected in the allocated uses on the site. This is in line with London Plan Policy T6.3.</p> <p>Proposed Modification</p> <p>‘Any planning application for the redevelopment of the site should be supported by evidence of car parking demand within the District Centre and show how that demand will be met by the re-provision of car parking capacity on the site or elsewhere.’</p>
Places for London	<p>Indicative Residential Capacity The ‘Indicative residential capacity’ is said to be “69 <i>dwelling houses / units</i>”. This would not optimise the development opportunity provided by this underused site. Development at such low density would also not be viable, particularly given existing use value of the car park. In our ‘call for sites’ form, we estimate the site has capacity for 100 – 130 new homes (likely flats – we would not build houses here). As a benchmark, the 2016 (now superseded) version of the London Plan’s Table 3.2 <i>Sustainable residential quality density matrix</i> suggests that the upper end of suitable density here would be in the region of 157 – 221 homes (185 – 260 u/ha)⁴ and the median range would be between 98 and 140 homes (115 - 165 u/ha). The SA capacity of 69 homes is clearly not in line with the adopted London Plan requirements of policies D1, D3 and H1 to make the best use of land and optimise the capacity of sites. It must be increased substantially for the Plan to be ‘sound’.</p>	<p>Development capacities have been identified through the undertaking of design-led capacity assessment of each site allocation [following guidance set out in the Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023)]. The Council considers represents an appropriate method of identifying capacities within the Plan. Reference to the density matrix in the former London Plan is contrary to the design-led approach / guidance of the current London Plan.</p>

⁴ Based on PTAL 4-5 and the site being in an urban location (ie. predominantly dense development, mix of different uses, medium building footprints, typically buildings of two to four storeys and located on a main arterial route.

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Places for London	<p>Requirements</p> <p>The SA Requirements will also need to be substantially amended:</p> <p>Deliver high quality residential development</p> <p>Re-provision of an appropriate level station car-parking to help meet need generated by commuters limited replacement car parking with the aim to reprovide only where essential, for example for disabled persons or operational reasons</p> <p>Provide step-free access to Rayners Lane Station Contribute towards the provision of step -free access to Rayners Lane Station commensurate with the quantum of development</p> <p>Step free access (SFA) would not be necessary to make such a small-scale residential development (100-130 homes) acceptable in planning terms and would not be viable in association with such a small scheme. We would, of course, be happy to make a contribution towards SFA commensurate with the scale of development. Please note that Rayners Lane is <u>one of nine tube stations shortlisted for the next phase of SFA work on the network</u> and this is entirely independent of any development on the car park site.</p>	<p>No proposed modifications</p> <p>The Council agree that the parking requirement for the new uses on the site should be restricted in line with the London Plan’s parking standards and Policy M2 of this Plan, other than for disabled users, due to the good PTAL in line with Policy M2. There is however, a need to ensure a sufficiency of convenient public car parking to support the role of the District centre.</p> <p>It is considered that this site currently offers public town centre car parking that underpins trips to the centre from areas not well served by public transport, thereby underpinning the vibrancy and vitality of the town centre.</p> <p>As such the Council considers there may be a requirement for public car parking on this site, and this should be reflected in the allocated uses on the site. This is in line with London Plan Policy T6.3.</p> <p>Proposed Modification</p> <p>Re-provision of an appropriate level of l-station car-parking to help meet need generated by commuters to support the vitality of the District Centre.</p> <p>Provide step-free access to Rayners Lane Station Contribute towards the provision of step -free access to Rayners Lane Station commensurate with the quantum of development</p>
Places for London	<p>The Development principles will need to be amended to reflect the above. We suggest:</p> <p>Paragraph 2: delete (retail units fronting Alexandra Avenue are not part of the development site)</p>	<p>The site is not appropriate for industrial, but class E is appropriate.</p> <p>No proposed modifications</p>
Places for London	<p>The Development principles will need to be amended to reflect the above. We suggest:</p> <p>Paragraph 3: delete (car parking will not be reprovided on site or elsewhere)</p>	<p>The Council agree that the parking requirement for the new uses on the site should be restricted in line with the London Plan’s parking standards and Policy M2 of this Plan, other than for disabled users, due to the good PTAL in line with Policy M2. There is however, a need to ensure a sufficiency of convenient public car parking to support the role of the District centre.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>It is considered that this site currently offers public town centre car parking that underpins trips to the centre from areas not well served by public transport, thereby underpinning the vibrancy and vitality of the town centre.</p> <p>As such the Council considers there may be a requirement for public car parking on this site, and this should be reflected in the allocated uses on the site. This is in line with London Plan Policy T6.3.</p> <p>No proposed modification.</p>
Environment Agency	We believe using the term “ <i>Flood zone (Surface Water) 3a</i> ” is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	<p>Proposed Modification:</p> <p>Replace Flood zone (Surface Water) 3a with:</p> <p><u>Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.</u></p>
RAF Northolt	Development of, or exceeding, 10.7m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations’ Planning Considerations.</p> <p>No proposed modifications</p>

Allocation O8 – Harrow West Conservative Association

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
RAF Northolt	Development of, or exceeding, 45.7m in height above ground level will trigger statutory consultation requirement, Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations’ Planning Considerations.</p> <p>No proposed modifications</p>
Environment Agency	We believe using the term “ <i>Flood zone (Surface Water) 3a</i> ” is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	<p>Proposed Modification:</p> <p>Replace Flood zone (Surface Water) 3a with:</p> <p><u>The site is at high risk of surface water flooding, particularly along the west and north of the site. Safe access and egress routes should be directed to the south of the site towards Village Way where there is a lower risk of flooding.</u></p>

		Development should be directed away from the north and west of the site where there is higher risk of surface water flooding.
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Allocation O9 – Pinner Telephone Exchange

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Turley for Telereal	<p>It is positively noted that following the information submitted under last year’s Call for Sites, Pinner Telephone Exchange is now subject to Draft Site Allocation ref. O9.</p> <p>Our client confirms that it is the sole landowner of the site, which is deemed deliverable, suitable, available and economically viable (in line with the definition of deliverable housing sites set out in NPPF Para. 72 (69) and its Glossary). Our client therefore strongly supports this draft site allocation.</p> <p>With regards to site specific site allocation requirements, we would like to use this opportunity to comment as follows:</p> <p>Site objective, Allocated Use and Development Timeframe are supported and deemed realistic/deliverable. It is strongly considered that residential is the optimum use for the site in this location and in light of its surrounding land uses/character of the area.</p> <p>Indicative residential capacity: It is acknowledged that the draft site allocation refers to an indicative capacity of 44 residential units.</p> <p>Following further consideration of the constraints of the site, its surrounding/developable area, and existing built environment (part-3/part-4 commercial storeys), it is our client’s opinion that - realistically - a higher development capacity is indeed achievable (i.e. in the region of 60-70 residential units, assuming a flatted development) through a design-led approach as envisaged under the NPPF and London Plan policies referred to above.</p> <p>In order to optimise the site’s capacity and make most effective use of brownfield land, it is recommended that the indicative residential capacity is modified as set out in Section 6 below (or at least identified as a minimum target), thereby ensuring that the Draft Local Plan remains sound in its approach to individual development sites.</p> <p>Development Principles are considered acceptable and supported in-principle.</p> <p>Suggested Additions</p> <p>Draft Site Allocation O9 (Pinner Telephone Exchange)</p> <p>Indicative (minimum) residential capacity: 44 60-70</p> <p>Reason: Reference to a revised (minimum) residential capacity is considered necessary to ensure that the draft site allocation is prepared in accordance with the NPPF and London Plan, as set out in Section 5 above.</p>	<p>Development capacities have been identified through the undertaking of design-led capacity assessment of each site allocation [following guidance set out in the Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023)]. The Council considers represents an appropriate method of identifying capacities within the Plan.</p> <p>No proposed modifications</p>
RAF Northolt	<p>Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.</p>	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations’ Planning Considerations.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Environment Agency	As there is FZ3a and 2 to the east of the site, you should keep development towards the west of the site where it is FZ1. Furthermore, we require an 8m buffer from the top of the bank of the Yeading Brook to the east of the site. Any development within 8m of this river will require a Flood Risk Activity Permit. A Flood Risk Assessment (FRA) will also need to be submitted as part of this development.	Noted. No proposed modifications
Environment Agency	We believe using the term “ <i>Flood zone (Surface Water) 3a</i> ” is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Proposed Modification: Replace Flood zone (Surface Water) 3a with: <u>The site is at high risk of surface water flooding, particularly along the east of the site.</u> <u>The site is at risk from fluvial flooding from Yeading Brook, especially on its eastern part.</u> <u>Site access and egress routes will be directed to the west of the site towards Cannon Lane where there is a lower risk of fluvial flooding.</u> <u>Development should be directed away from the eastern areas of the site where there is higher risk of surface water flooding.</u>

Allocation O10 – Harrow View Telephone Exchange

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Turley for Telereal	<p>It is positively noted that following the information submitted under last year’s Call for Sites, Harrow (View) Telephone Exchange is now subject to Draft Site Allocation ref. O10.</p> <p>Our client confirms that it is the sole landowner of the site, which is deemed deliverable, suitable, available and economically viable (in line with the definition of deliverable housing sites set out in NPPF Para. 72 (69) and its Glossary). Our client therefore strongly supports this draft site allocation.</p> <p>With regards to site specific development priorities, we would like to use this opportunity to comment as follows:</p> <p>Site objective, Allocated Use and Development Timeframe are supported and deemed realistic/deliverable. It is strongly considered that residential is the optimum use for the site in this location and in light of the surrounding land uses/character of the area.</p> <p>Indicative residential capacity: It is acknowledged that the draft site allocation refers to an indicative capacity of 27 residential units.</p> <p>Following further consideration of the constraints of the site, its surrounding/developable area, and existing built environment (part-2/part-3 commercial storeys), it is our client’s opinion that - realistically - a moderately higher development capacity is achievable (i.e. in the region of 35-40 residential units, assuming a flatted development) through a design-led approach as envisaged under the NPPF and London Plan policies referred to above.</p>	<p>Development capacities have been identified through the undertaking of design-led capacity assessment of each site allocation [following guidance set out in the Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023)]. The Council considers represents an appropriate method of identifying capacities within the Plan.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>In order to optimise the site's capacity and make most effective use of brownfield land, it is recommended that the indicative residential capacity is modified as set out in Section 6 below (or at least identified as a minimum target), thereby ensuring that the Draft Local Plan remains sound in its approach to individual development sites.</p> <p>Development Principles are considered acceptable and supported in-principle.</p> <p>However, and whilst it is agreed that the site is in an area subject to a comparatively low public transport accessibility (on the basis of its PTAL rating), any requirement for a contribution towards sustainable transport improvements should be proportionate to the quantum of development proposed and therefore reasonable, in accordance with the requirements of Regulation 122(2) of The Community Infrastructure Levy Regulations 2010 (as amended) (hereafter: "the Regulations").</p> <p>Suggested Additions Draft Site Allocation O10 (Harrow View Telephone Exchange)</p> <p>Indicative (minimum) residential capacity: 27 35-40</p> <p>Reason: Reference to a revised (minimum) residential capacity is considered necessary to ensure that the draft site allocation is prepared in accordance with the NPPF and London Plan, as set out in Section 5 above.</p> <p>Development principles: [...]</p> <p>The Council recognises that the site is not located in a highly sustainable location, and therefore any new development must reasonably and proportionally contribute to sustainable transport improvements & support measures as set out in the Council's Long Term Transport Strategy and Local Implementation Plan.</p> <p>[...]</p> <p>Reason: To ensure that any requirement for contributions towards sustainable transport improvements are reasonable and proportionate in accordance with Reg. 122(2) of the Regulations, as set out in Section 5 above.</p>	
RAF Northolt	Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.	Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations. No proposed modifications

Allocation O11 – North Harrow Methodist Church

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	<p>The site has a PTAL of 2, forms part of Hatch End local centre and is close to Hatch End Overground station.</p> <p>The requirement for an appropriate provision of car parking should be deleted because car parking should be provided in line with Policy M2 and London Plan parking standards. There should be no need for additional car parking to serve the local centre which has a local catchment that enables people to walk or cycle.</p> <p>In the development principles the following should be deleted as shown 'An appropriate level of car-parking should be retained; reprovided on site or relocated as part of development in order to meet the need generated by development as well as for the broader town-centre.'</p>	<p>Noted.</p> <p>Proposed Modification:</p> <p>'An appropriate level of car-parking should be retained, reprovided on site or relocated as part of development in order to meet the need</p>

		generated by development as well as for the broader town centre.
Environment Agency	We believe using the term “ <i>Flood zone (Surface Water) 3a</i> ” is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Proposed Modification: Replace Flood zone (Surface Water) 3a with: <u>The site is at moderate risk of surface water flooding, particularly in the south area of the site.</u>
RAF Northolt	Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.	Noted, reference has been made to the RAF safeguarding zone in the Allocations’ Planning Considerations. No proposed modifications

Allocation O12 – Hatch End Telephone Exchange

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	The site has a PTAL of 2, forms part of Hatch End local centre and is close to Hatch End Overground station. The requirement for an appropriate provision of car parking should be deleted because car parking should be provided in line with Policy M2 and London Plan parking standards. There should be no need for additional car parking to serve the local centre which has a local catchment that enables people to walk or cycle. In the development principles the following should be deleted as shown ‘ An appropriate level of car-parking should be retained, reprovided on-site or relocated as part of development in order to meet the need generated by development as well as for the broader town centre. ’	Noted. Proposed Modification: ‘An appropriate level of car-parking should be retained, reprovided on-site or relocated as part of development in order to meet the need generated by development as well as for the broader town centre.’
RAF Northolt	Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily	Noted, reference has been made to the RAF safeguarding zone in the Allocations’ Planning Considerations. No proposed modifications

Allocation O13 – Harrow Arts Centre

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Thames Water	Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority’s aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet Harrow to discuss the wastewater infrastructure needs relating to the Local Plan.	Noted. No proposed modifications
Theatres Trust	We support this site allocation as it promotes the continued development and expansion of Harrow Arts Centre, which is an important and valued arts and cultural facility serving its community.	Noted. No proposed modifications

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
RAF Northolt	Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily	Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations. No proposed modifications
Historic England	This site is adjacent to several listed and locally listed buildings. It is therefore important that proposals understand the significance of those buildings and seek to respond in a sensitive manner that conserves and, if possible, enhances that significance.	These are referenced in the policy. No proposed modifications

Allocation O14 – Vernon Lodge

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Bell Cornwall obo Old Millhillians	The Council recognises that Vernon Lodge has the second to lowest PTAL rating (1b) and, as a result, the allocation of Vernon Lodge conflicts with Draft Policy HO6 which seeks to deliver specialist housing in PTAL 3-6 areas. The low PTAL rating of Vernon Lodge is expected given the nearest train station (Harrow and Wealdstone) is some 1.2 miles or a 30-minute walk from the site to the south which is entirely unsuitable for older person housing.	Noted. Due to the ownership the Council does not consider an alternative use is likely. The site should however, deliver sustainable travel options for residents. Proposed Modification: New Requirement: A Travel Plan will be required to demonstrate how sustainable travel patterns for residents of the site can be achieved.
Bell Cornwall obo Old Millhillians	In our view this site is unsuitable, unavailable and undeliverable. It is understood that Vernon Lodge was formerly a care home in the 1970s but more recently it has been used as a hostel. Vernon Lodge is currently vacant, however, in accordance with Draft Policy HO10: <i>“Housing with shared facilities (Housing in Multiple Occupation), the loss of the existing use would need to demonstrate that either there is no local need for the type of accommodation, that the proposal was for a replacement provision at an equivalent or better standard, the use is inviable or unsuitable and the replacement provision is addressing a more acute local need.”</i> We note that a planning application was submitted in November 2018 for, <i>“Redevelopment to provide two blocks ranging between one to four storeys to create 300 bed temporary housing facility with management offices (Sui Generis); Parking; Landscaping; Refuse and Cycle Storage”</i> (Ref: P/4895/18). The application was withdrawn by the applicant in 2019. It is not clear why the applicant withdrew the application; however, we note a significant number of objections to the planning application from local residents. Most of the objections related to the scale of development within a suburban character area. Therefore, we surmise that the Council indicated to the applicant that they were going to refuse planning permission. No further planning applications have been made in the 5 years since. We note that the Council have recently resolved to dispose of the site. A report for Cabinet dated 15 February 2024 recommending the sale of the freehold interest at Vernon Lodge states that: <i>“The property is vacant and has been identified as being surplus to the Council’s service needs. The costs of bringing the property back into use is significant. It is no longer economically viable and there is no alternative use identified at a lesser cost”.</i> A total of five options were considered with, ‘Option 5: Dispose on the open market’ chosen. Vernon Lodge was subsequently marketed by Savills in March 2024. It is not known whether a purchaser has since acquired the site. It is noted that Vernon Lodge is given an overall score of 19% in the ‘Site selection / allocation methodology’ (4 November 2024). This is second to lowest score out of the allocated sites save for draft allocation ‘018 Wolstenholme’ which is also allocated to	The Council has sold this site to an active developer. Pre-application discussions are underway, and we expect the site to be delivered before 2031. No proposed modifications

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>deliver specialist older people housing. It is clear that the delivery of this type of housing needs greater consideration by the Council.</p> <p>The allocation of Vernon Lodge is unsuitable. The low PTAL rating conflicts with Draft Policy HO6, there is no current owner to deliver a scheme and given the significant local opposition to the 2018 application the prospects of achieving planning permission for the full quantum of indicative residential units is considered low.</p>	
Environment Agency	<p>We believe using the term “Flood zone (Surface Water) 3a” is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Proposed Modification:</p> <p>Replace Flood zone (Surface Water) 3a with:</p> <p><u>The site is at high risk of surface water flooding, particularly around the west and north part of the existing building in the site.</u></p> <p><u>Safe access and egress routes should be directed to the north of the site towards Mountside where there is a lower risk of flooding. Development should be directed away from the northern and western areas of the site where there is higher risk of surface water flooding.</u></p>
RAF Northolt	<p>Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.</p>	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations’ Planning Considerations.</p> <p>No proposed modifications</p>

Allocation O15 – Belmont Clinic

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Thames Water	<p>Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority’s aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet Harrow to discuss the wastewater infrastructure needs relating to the Local Plan.</p>	<p>Noted.</p> <p>No proposed modifications</p>
RAF Northolt	<p>Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.</p>	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations’ Planning Considerations.</p> <p>No proposed modifications</p>
Environment Agency	<p>We believe using the term “Flood zone (Surface Water) 3a” is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>Proposed Modification:</p> <p>Replace Flood zone (Surface Water) 3a with:</p> <p><u>The site is at medium risk of surface water flooding, particularly in the centre of the site.</u></p>

		Safe access and egress routes should be directed to the south west of the site towards Kenton Lane where there is a lower risk of flooding. Development should be directed away from the centre of the site where there is higher risk of surface water flooding.
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Allocation O16 – Traveller’s Rest

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Mohantal Shah	Does not consider policy sound.	Noted, no evidence or justification for objection. Possible Kenton West CPZ consultation objection. No proposed modifications
Environment Agency	We believe using the term “Flood zone (Surface Water) 3a” is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Proposed Modification: Replace Flood zone (Surface Water) 3a with: Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.
LB Brent	This site, which borders the railway on its western side, provides considerable scope for height, both along Kenton Road and further north within the site. Indicative heights might be included in the site allocation summary, for example 5-6 storeys. This would acknowledge that the site benefits from being adjacent to both the railway and to a wide, major road junction and would reflect building heights that have come forward on the Brent side of Kenton Road, such as Hillrise Court, 135 Kenton Road, to the immediate south west of Kenton station. Indicative building heights may give confidence to prospective developers regarding the scale of development likely to be acceptable in this context, promoting compliance with London Plan policy D3 <i>Optimising site capacity through the design-led approach</i> .	Policy GR4: Building Heights does not identify any areas appropriate for tall buildings outside the Harrow and Wealdstone Opportunity Area, consistent with the evidence base informing the Local Plan. The Tall Building (Building Heights) SPD provides guidance for building heights outside the Opportunity Area. No proposed modifications
Savills obo Whitbread	The Site contains a collection of two-three storey buildings that are currently in operation as public house a restaurant and bar (Beefeater) on Kenton Road and a hotel (Premier Inn) with hard standing areas used for car parking to the rear. It is located on the junction of Kenton Road and Carlton Avenue, and is adjacent to Kenton Underground and Overground Station. It is within the Kenton Road District Town Centre, which is generally characterised by 2-3 storey building with town centre commercial uses on ground floor and residential on upper floors. The only exception is the recently completed mixed use development adjacent to the station that is 3-6 storey in height. A number of sites within proximity to it have been developed in recent years and a major redevelopment/regeneration is proposed by the Brent Local Plan for Sainsbury supermarket site allocation (directly opposite it).	The Council considers that the existing use is a public house. No proposed modifications
Savills obo Whitbread	Whitbread objects to Allocation O16 which is not viable or deliverable; is contrary to other policies in the Local Plan and NPPF and would be fail to deliver the strategic objectives of the Local Plan. The draft Allocation should be amended as set out above accordingly.	Objection noted. Detailed response below. No proposed modifications
Savills obo Whitbread	Hotel - Public House Restaurant and Bar	The Council considers that the existing use is a public house.

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		No proposed modifications
Savills obo Whitbread	5-6a 4 to 5	Agreed. Proposed Modification: Change the PTAL to 4-5.
Savills obo Whitbread	A mixed-use development that re-provides a ground floor Food and Beverage provision (Class E / Sui Generis) Public House, alongside a residential-led development (comprising a mix of C3 dwellings and co-living accommodation) and Hotel within the Kenton District Town Centre, with an enabling residential element. A mixed-use development which provides residential dwellings (Class C3) and Co-Living (Sui Generis) with flexible Restaurant (Class E b) / Drinking Establishment (Sui Generis) use or Doctors Surgery (Class E e) on the ground floor in Kenton District Centre.	The Council's housing need evidence does not identify a significant unmet need for co-living housing. In the context of suggested modifications to Policy LE5, the site objective could also be updated with respect to hotels. Proposed modifications Amend 'Site objective' as follows: A mixed-use development that retains or re-provides a Public House and Hotel within the Kenton District Town Centre, with an enabling residential element.
Savills obo Whitbread	Leading land use Hotel Public house Restaurant / Drinking Establishment or Doctors Surgery Residential Supporting land use(s) Town centre uses	The Council considers that the existing use is a public house and the Local Plan includes policies to retain such uses and this is reflected in the proposed uses. Reference to hotel could be deleted to reflect changes to Policy LE5. Health facilities are identified on sites in consultation with the NHS. Proposed modifications Delete hotel from 'Leading land use'
Savills obo Whitbread	109 C3 dwelling houses / units and 103 co-living units (Sui Generis)	The Council's housing need evidence does not identify a significant unmet need for co-living housing. Development capacities have been identified through the undertaking of design-led capacity assessment of each site allocation [following guidance set out in the Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023)]. The Council considers represents an

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>appropriate method of identifying capacities within the Plan.</p> <p>No proposed modifications</p>
Savills obo Whitbread	<p>Re-provision of hotel use on site Re-provision of Restaurant / Drinking Establishment public house on site or else delivery of a new Doctors Surgery Retention of trees protected by Tree Preservation Orders (TPOs).</p>	<p>The Council considers that the existing use is a public house.</p>
Savills obo Whitbread	<p>The site is located within the Kenton District Town Centre and currently is in use as a Travellers Rest Beefeater Restaurant Public House and a Premier Inn Hotel. The site is rectangular in shape, extending northwards with Carlton Road to the east and the Main Trunk train Line and London Underground / Overground train line to the west.</p> <p>The shape and size of the site would allow for a major residential-led mixed use scheme to be delivered on site.</p> <p>Any new development must, at ground floor level, seek to reprovide the a restaurant and bar public house and hotel or else a new Doctors Surgery on the site, to provide an active frontage and town centre uses within the District Centre. Public Houses provide an important element in British culture and also provide an important contribution to town centres. Public houses can play a valuable role in the local community as an informal meeting place and can provide a range of community functions. They also provide an offer to support the evening economy with a centre. Kenton has a very poor offer of pubs and bars and sits well below the UK average, with only one public house identified in 2023.</p> <p>The site can be regarded as an undesignated heritage asset, specifically the 1933 Tudor Revival style Travellers Rest hotel and former off-licence adjacent by Robert George Muir, which have key historic interest as an emblematic reminder of the growing suburban Metroland development of the 1930s that Harrow is known for, and of changing social values and social reform of the time that created 'the Improved Public House'. Any proposals for replacement buildings would therefore need to have regard to this context heritage in their design and materiality in accordance with the National Planning Policy Framework, the London Plan and heritage policies within this Local Plan.</p> <p>There is a need across both London as a whole and Harrow for tourism infrastructure, specifically with regard to hotels / serviced apartments. The site is in a highly sustainable location and has excellent public transport links to Wembley and Central London.</p> <p>Given the size of the site, an a substantial element of residential development, for which there is a defined need, is able to be delivered on site in conjunction with the above requirements, and may is be capable of providing more height than which exists in the surrounding area. Whilst the size of the site could allow for more height, care must be taken to respect the much lower form of development, particularly along Carlton Avenue which is represented by two-story dwellings. Any new residential development must demonstrate a high quality of amenity, with particular care in relation to noise and vibration caused by the railway line along the western boundary of the site.</p> <p>Any new development that involves demolition of the existing buildings and new build, must provide an appropriately designed frontage to Kenton Road. This must include both in terms of an active frontage appropriate to a town centre, but also the relationship with Kenton Road, which is a busy carriage way directly adjacent to the site.</p> <p>The site is located in a mixed-use area but within a suburban context, any new development should be progressed following the guidance set out in the Tall Building SPD (Building Heights) SPD (2023).</p>	<p>Health facilities are identified on sites in consultation with the NHS.</p> <p>There is a need to maintain and potentially increase hotel capacity in the borough and this is reflected in relevant policies within the Local Plan. Reference to hotel could however be deleted to reflect suggested amendments to Policy LE5.</p> <p>Proposed modifications Delete 'Re-provision of hotel use on site' from 'Requirements'.</p> <p>Delete 'and hotel offer' from 'Development principles' (third paragraph).</p> <p>At the end of the fifth paragraph, add the following: 'Any loss or tourism accommodation from the site will be assessed in accordance with Policy LE5 – Tourism & Visitor Accommodation.'</p>
Savills obo Whitbread	<p>As set out above, the Beefeater Restaurant is not a Public House and as such there is no requirement for this specific use to be retained.</p> <p>Notwithstanding this position, it is recognised that a replacement restaurant / bar (Class E b/Sui Generis) or a Doctors Surgery (Class E e) would provide a beneficial town centre use to complement other uses within the Kenton District Centre. The provision of an active frontage and natural surveillance would similarly improve the current public realm along Kenton Road.</p>	<p>The Council considers that the existing use is a public house.</p> <p>Health facilities are identified on sites in consultation with the NHS.</p> <p>Town centre uses are already identified as a supporting use.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		No proposed modifications
Savills obo Whitbread	<p>Kenton Bridge Medical Centre is located at 155-175 Kenton Road, Harrow, HA3 0YX. It is currently overcapacity and actively looking to expand its provisions. As part of the public consultation process for the emerging redevelopment of 134 Kenton Road, Whitbread has been approached by the Medical Centre with a view to discussing scope for any new scheme to accommodate a new expanded doctor's surgery (which would sit alongside and in addition to the Medical Centre at 155-175).</p> <p>The practice has struggled to find suitable accommodation and the proposed unit within the new development at 134 Kenton Road would meet their requirements and locational criteria.</p> <p>The Site Allocation could therefore allow for the potential for a doctor's surgery, to respond to healthcare needs of the local community.</p>	<p>Noted. The proposed allocations does not preclude the provision of a health facility on the site.</p> <p>Health facilities are identified on sites in consultation with the NHS.</p> <p>No proposed modifications</p>
Savills obo Whitbread	<p>The London Plan requires LB Harrow to deliver 8,020 new dwellings between 2019-2029. Whilst the majority of these are to come forward within the Harrow and Wealdstone Opportunity Area, there is nonetheless a strategic direction to deliver sufficient housing across the borough to meet a wide range of housing needs. This was a key point made in our previous Call for Sites Submissions, both of which sought the delivery of a substantial uplift of residential uses across the Site.</p> <p>As noted above, the draft Allocation's stipulation that the existing hotel be retained would not only prejudice LB Harrow's strategic goal of delivering more hotel rooms, but it would also impede the delivery of much needed houses.</p> <p>As written, the draft Allocation allows for 109 C3 dwellings as primarily enabling development to allow for the retention of the existing hotel and Public House. However, as explored through comprehensive pre-application discussions with the Local Planning Authority, the genuine residential capacity of the Site in the event the hotel use is removed is substantially higher. The present emerging design allows for 103 co-living rooms with associated amenity space (Sui Generis) and 109 Build-to-Rent dwellings (Class C3).</p> <p>In this respect, whilst the draft Allocation's reference to the 109 C3 dwelling houses / units is welcomed, any reference to co-living accommodation here is omitted. Per our above suggested amendments to Policy HO9 in the Draft Local Plan, the Site is ideally suited for co-living uses given its highly accessible location. Subject to being able to demonstrate need therefore, it is felt the draft Allocation's stipulation that residential on this Site should come forward as C3 only is unduly restrictive and fails to allow for genuine flexibility to meet local housing need. In light of the above, amendments are requested to include Co-Living accommodation in the Allocation.</p>	<p>The Council's housing need evidence does not identify a significant unmet need for co-living housing.</p> <p>No proposed modifications</p>
RAF Northolt	<p>Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.</p>	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations.</p> <p>No proposed modifications</p>

Allocation O17 – Kenton Rd Telephone Exchange

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Thames Water	<p>Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet Harrow to discuss the wastewater infrastructure needs relating to the Local Plan.</p>	<p>Noted.</p> <p>No proposed modifications</p>
LB Brent	<p>This site sits along a stretch of road identified as an Intensification Corridor in the Brent Local Plan. Along this stretch of road, heights of around 15 metres or 5 storeys are envisaged for schemes falling within Brent.</p>	<p>Policy GR4: Building Heights does not identify any areas appropriate for tall buildings outside the Harrow and Wealdstone Opportunity Area,</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	Site allocation O17 states that opportunity exists for sensitive upward extension. However, as suggested above, including indicative building heights may give confidence to prospective developers regarding the scale of development which might be acceptable in this context, promoting compliance with London Plan policy D3 <i>Optimising site capacity through the design-led approach</i> .	<p>consistent with the evidence base informing the Local Plan.</p> <p>The Tall Building (Building Heights) SPD provides guidance for building heights outside the Opportunity Area.</p> <p>No proposed modifications</p>
Environment Agency	We believe using the term “Flood zone (Surface Water) 3a” is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	<p>Proposed Modification:</p> <p>Replace Flood zone (Surface Water) 3a with:</p> <p><u>The site is at risk from fluvial flooding from the Wealdstone Brook, especially in the western part of the site.</u></p> <p><u>The site is at medium risk of surface water flooding, however there is a small portion at higher risk, along the northwest of the site. The areas outside the west of the site are at high risk.</u></p> <p><u>Safe access and egress routes should be directed to the east of the site towards Kenton Road where there is a lower risk of flooding.</u></p> <p><u>Development should be directed away from the north west of the site where there is higher risk of surface water flooding. Development should be directed away from the north west of the site where there is higher risk of surface water flooding.</u></p>
Turley for Telereal	<p>It is positively noted that following the information submitted under last year’s Call for Sites, Kenton Road Telephone Exchange is now subject to Draft Site Allocation ref. O17.</p> <p>Our client confirms that it is the sole landowner of the site, which is deemed <i>deliverable, suitable, available and economically viable</i> (in line with the definition of deliverable housing sites set out in NPPF Para. 72 (69) and its Glossary). <u>Our client therefore strongly supports this draft site allocation.</u></p>	<p>Noted.</p> <p>No proposed modifications</p>
Turley for Telereal	<p>With regards to site specific development priorities, we would like to use this opportunity to comment as follows:</p> <p>Site objective, Allocated Use and Development Timeframe are supported and deemed realistic/deliverable, unless where specified below.</p> <p>Given the site’s setting on Kenton Park Parade and the fact that the existing building may be retained/refurbished (see Development Principles below), further assessment / testing will be required to confirm the optimum use and split between/level of residential and non-residential (i.e. town centre or social infrastructure uses). Given the existing use is expected to be retained on site until 2031, it is strongly recommended to ensure there is sufficient flexibility incorporated into the draft site allocation to allow for market demand (at</p>	<p>Noted.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	the time), development viability and/or other commercial factors to confirm the site's optimum use. Given the constraints of the existing building (which may be retained/refurbished), further feasibility testing will be undertaken at planning application stage.	
Turley for Telereal	<p>As set out in Section 6 below, we recommend modifications to incorporate the required flexibility to bring this site forward in the most suitable mix of uses.</p> <p>Indicative residential capacity: It is positively noted that the draft site allocation refers to an indicative capacity of 12 residential units which is deemed realistic at this stage, but may be reviewed in light of our commentary above once a planning application is being prepared. Indeed, further feasibility testing at application stage may even identify that there is additional development capacity. As we consider that the other draft site allocations referred to above benefit from a higher development capacity, it is suggested to incorporate additional flexibility for this draft site allocation in terms of its final mix of uses and capacity, as set out in Section 6 below.</p>	<p>Development capacities have been identified through the undertaking of design-led capacity assessment of each site allocation [following guidance set out in the Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023)]. The Council considers represents an appropriate method of identifying capacities within the Plan. Further design work through the planning application stages will help to refine the capacity of each site as greater detail is added.</p> <p>Site allocation / uses are considered sufficiently flexible.</p> <p>No proposed modifications</p>
Turley for Telereal	<p>Development Principles are considered acceptable and supported <i>in-principle</i>. The existing building is considered suitable to explore a conversion and (upward/rear) extension alongside a redevelopment. The optimum development solution making most effective use of the site/maximising its full potential should be fully explored at planning application stage.</p>	<p>Noted.</p> <p>No proposed modifications</p>
Turley for Telereal	<p>Proposed Modifications</p> <p>Draft Site Allocation O17 (Kenton Road Telephone Exchange)</p> <p>Allocated use:</p> <ul style="list-style-type: none"> • Leading land use: Residential and/or Town centre / Community / Social Infrastructure uses (subject to market demand and development viability at the time) • Supporting land use(s): Town centre uses / Community uses (if leading land use is residential and subject to market demand) <p>Indicative (minimum) residential capacity: 12 (if leading land use is residential)</p> <p>Reason: As set out in Section 5 above, the leading land use should be subject to market demand/testing, development viability and/or other commercial factors at the time when the existing use ceases (i.e. 2031) to reflect the site's location along Kenton Park Parade as well as the existing building and its constraints. Reference to a revised (minimum) residential capacity is nevertheless recommended to ensure that the draft site allocation is prepared in accordance with the NPPF and London Plan, as set out in Section 5 above, should the leading land use be residential.</p>	<p>It is important in establishing a developable land supply for the future that a lead land use is identified. Alternative leading uses may be able to be justified once detailed feasibility and design work has been undertaken by the landowner.</p> <p>No proposed modifications</p>
RAF Northolt	<p>Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</p>	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations.</p> <p>No proposed modifications</p>
Environment Agency	<p>Any development should be kept within FZ1. A Flood Risk Assessment (FRA) will also need to be submitted as part of this development.</p>	<p>Noted.</p> <p>No proposed modifications</p>

Allocation O18 – Wolstenholme

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Bell Cornwall obo Old Millhillians	<p>As with the Vernon Lodge site, Wolstenholme has almost the lowest PTAL rating (1b) and as a result, the allocation of this site conflicts with the Draft Policy HO6 which seeks to deliver such housing in PTAL 3-6 areas.</p> <p>The site currently comprises sheltered accommodation and it is not vacant. In accordance with Draft Policy H07: Supported and Sheltered Housing, the loss of the existing use would be resisted by the Council unless:</p> <p><i>i. “adequate replacement accommodation of the same quality and quantity;</i> <i>ii. will be provided for the particular group; or</i> <i>iii. it can be demonstrated that the accommodation is no longer needed for the particular group or other relevant groups in need of supported/sheltered housing; and</i> <i>iv. it can be demonstrated that the accommodation is not suitable for the care of the intended occupants (or other relevant occupants of supported/sheltered accommodation) in its current condition and format and/or is incapable of being maintained at an acceptable standard”.</i></p> <p>This policy creates a significant barrier to the site coming forward for specialist older people housing.</p>	<p>The proposed allocation reflects the existing use of the site and the previously identified / permitted scope for expansion on-site.</p> <p>No proposed modifications</p>
Bell Cornwall obo Old Millhillians	<p>The draft allocation of the Wolstenholme site indicates a residential capacity of 25 specialist older person units. The development timeframe is given as 11 – 15 years. The site was also allocated in the Harrow Site Allocations Local Plan (2013). In our view this site is unsuitable, unavailable and undeliverable.</p> <p>We note that a planning application was submitted in January 2018 for the redevelopment of the site to provide 2 x 3 storey buildings (one with a lower ground level) comprising of 57 extra care home flats and 2 general needs wheelchair flats (Use Class C3) including communal lounge and ancillary offices; cycle, refuse and electronic buggy stores; 16 car parking spaces (demolition of existing buildings) (Ref: P/5758/17). This planning permission was not implemented and has now lapsed. No further planning applications have been made in the 6 years since.</p> <p>It is noted that Wolstenholme has the lowest overall score of just 8% in the 'Site selection/allocation methodology' (4 November 2024) among all the draft allocations.</p> <p>Overall, the site has been allocated for development since 2013 and has not delivered. The site is heavily constrained by the existing use and by designated heritage assets. As with Vernon Lodge, this site is unsuitable, unavailable and undeliverable.</p>	<p>The site selection / allocation methodology identifies the relative merits of each of the allocated sites. In some instances, there maybe other planning grounds to justify the allocation of the site, such as current use of the scope and identified scope for future expansion.</p> <p>No proposed modifications</p>
RAF Northolt	<p>Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily</p>	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations’ Planning Considerations.</p> <p>No proposed modifications</p>
Historic England	<p>Located immediately adjacent to historic core of Old Church Lane Conservation Area, Site 018 is one of the most sensitive site allocations in terms of the historic environment. The site includes a late Victorian building and has a verdant character, both of which contribute positively to the significance/ character and appearance of and the site allocation. In fact, the contribution made by the site is so significant that we recommend that the Conservation Area boundary is reviewed. Given the sensitivity of the site allocation, very clear development principles should be set out to ensure that all elements contributing to the conservation area are conserved, and that any new development is very carefully designed to ensure that it responds sensitively to the character of the conservation area and is appropriate in terms of height, massing and materiality. Refencing the Old Church Conservation Area Appraisal would be beneficial. This is also a site that could be affected by review of the APAs.</p>	<p>Noted.</p> <p>Proposed Modification:</p> <p>Amend final Development Principal:</p> <p>The design and layout of development on this site should contribute to protecting and enhancing the significance of must be sensitive to the setting of the adjoining</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		conservation area and the Locally listed cemetery and grade II* listed Church of St John the Evangelist (church and ruin) which faces the site, and should ensure the protection of the adjoining boundary wall.

Allocation O19 – Marsh Lane Gas Holders

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
RAF Northolt	Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily	Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations. No proposed modifications
Environment Agency	We believe using the term "Flood zone (Surface Water) 3a" is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	Proposed Modification: Replace Flood zone (Surface Water) 3a with: The site is at high risk of surface water flooding, particularly along the west of the site. Marsh Lane, at the west of the site, is at high risk of surface water flooding. Safe access and egress routes should be directed to the northeast of the site towards Wychwood Avenue where there is a lower risk of flooding. Development should be directed away from the west side of the site where there is higher risk of surface water flooding.
Avison Young obo Aldi Store Ltd	As set out above there has been no consultation with the landowner prior to the site being included as a residential development site. The site allocation for residential development is not effective as it is not deliverable for residential development over the plan period. The site is currently in private ownership it is not justified to allocate a site with significant easement restrictions for self-build housing when the Council cannot demonstrate that the site will come forward and effectively deliver the objectives of the plan.	The Council considers that the site is available given the active pre-application on the site; this demonstrates the developers' intention to bring the site forward (as does the response to the call for sites). No proposed modifications
Avison Young obo Aldi Store Ltd	It is noted that when Troy Planning and Design undertook a Small Sites Capacity Study for the Council in October 2022 the Marsh Lane Gas Holders site was not identified. This Study sought to identify potential small sites that might contribute towards meeting the Borough target for new homes, stating that: <i>"In line with the London Plan, it should be emphasised that the key focus of this study is to assess the potential supply of sites and their capacity for housing in areas of intensification, which are locations with a PTAL of 3 – 6, within 800, of a station, or 800m of a town centre"</i> (Page I).	The Council considers that the site is suitable for development as residential, and that includes self-build accommodation. The site has an area of 0.88 ha. The Small Sites Capacity Study focused on small sites, so this site was not within scope of that study. No proposed modifications

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>It is noticeable that the Marsh Lane Gas Holders do not meet the criteria specified on behalf of the Council in research that was published in October 2022. The identification of the site for residential purposes is therefore not justified as it is not based on proportionate evidence, as it does not meet criteria specified by the Council to identify small sites.</p> <p>The site allocation notes that: <i>“Given the context of the site, it would be suitable for self-build housing provided this resulted in the efficient and optimal use of the site and met any requirements in relation to gas infrastructure”.</i></p> <p>In order to bring forward this site for self-build it would be necessary to install the necessary infrastructure, it is not possible to deliver self-build housing on the site due to the site constraints and the conflict in the Regulation 19 Consultation that is seeking a density of development on the site that would require a flatted development.</p>	
Avison Young obo Aldi Store Ltd	<p>The Council have identified that the 0.88 ha site is capable of accommodating 70 residential units, this would lead to a residential density of 80 dwellings per hectare. The Small Sites Capacity Study prepared on behalf of the Council by Troy Planning and Design (October 2022) includes a simplified version of the London Plan Density Matrix used for initial estimates of site capacity. This is set out below at Table 1 for reference. The site has a PTAL of 1b – 2, and the site is described as being in a suburban location. Therefore, based on the density matrix the site the site has been identified as a density that is more akin to the higher end of a suburban location with a PTAL of 2 to 3.</p> <p>In order to deliver this quantum of development it would be necessary to consider a flatted development of circa three to four storeys. This conflicts with the identified development principles for the site which states: <i>“Given the context of the site, it would be suitable for self-build housing provided this resulted in the efficient and optimal use of the site and met any requirements in relation to gas infrastructure.”</i></p>	<p>The Small Sites Study is not relevant given the size of this site. The density matrix approach was utilised in that study given the number of potential small sites and the fact it is not practical nor necessary to do design-led capacity studies on so many sites.</p> <p>For this site, as with all other relevant allocations, development capacities have been identified through the undertaking of design-led capacity assessment of each site allocation [following guidance set out in the Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023)]. The Council considers represents an appropriate method of identifying capacities within the Plan. The capacity study for this site took into account the constraints of the sites, such as easements.</p> <p>No proposed modifications</p>
Avison Young obo Aldi Store Ltd	<p>There is a clear conflict between the delivery of flatted development and self-build. The site allocation is not effective as it is not deliverable over the plan period as there are clear conflicts within the site allocation in terms of the quantum and type of residential development that the site has been allocated for.</p>	<p>The Council notes that the site is constrained and this may present particular opportunities of self-build accommodation. This is not the only type of new housing the Council has allocated on this site.</p> <p>There is no reason why self-build cannot be at an appropriate (flatted) density (for example, communal self-build).</p> <p>No proposed modifications</p>
Avison Young obo Aldi Store Ltd	<p>The above is all calculated on the assumption of a site area of 0.88ha, as set out below this does not represent the true developable area of the site.</p>	<p>The design-led capacity assessment of the site is based on the developable part of the site and takes into account identified constraints.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Avison Young obo Aldi Store Ltd	<p>As part of the pre-application submission in January 2023, plans were submitted showing the easement to the east of the site in addition to the requirement to provide access to the infrastructure that is retained by Cadent. These constraints have not been acknowledged in the Regulation 19 Consultation. Therefore, the Regulation 19 Consultation is not justified as it is not based on a proportionate evidence base.</p> <p>For clarity within the easement zones, Cadent are legally able to retain, lay, construct, inspect, maintain, protect, use, enlarge, replace, renew, remove or render unusable the gas pipes that run through this area.</p> <p>Any owner of the site cannot construct any building, structure or permanent apparatus in the easement zones or cause any obstruction or material reduction of the depth of the soil. The following activities are permitted within this zone:</p> <ul style="list-style-type: none"> • Plant landscaping (albeit there are specific requirements with regard to the permitted planting); • Construct roads, cycleways, footpaths and parking areas; and • Install lighting and removeable street furniture, including street name plates, columns, bollards, bins and seats. <p>These parts of the site therefore cannot be used for built development and limits the type of landscaping in these areas. These parts of the site are not suitable for residential development (including amenity space or car parking) due to the access requirements of Cadent.</p>	<p>No proposed modifications</p> <p>The design-led capacity assessment of the site is based on the developable part of the site and takes into account identified constraints.</p> <p>No proposed modifications</p>
Avison Young obo Aldi Store Ltd	<p>Notwithstanding the above, the site is not suitable for any form of residential development.</p> <p>The site is currently in private ownership and is not available for residential development. Notwithstanding, without prejudice and for the avoidance of doubt taking into account the restrictions identified above regarding the development potential of the site, if the site were to be suitable for self-build properties there would be a requirement to install the necessary infrastructure to facilitate this, in addition it is unlikely to attract flatted development and maximise the development potential of the site. It is noted in in Appendix F: Assessment of Pre-Submission Local Plan Sites (London Borough of Harrow) that the Council would still expect to see affordable housing delivered on this site subject to viability testing.</p> <p>As set out above there are restrictions around the requirement to provide access to the site and also no-build zones. Provision for and access to these areas would need to be available round the clock, therefore, these areas could not be used for purposes ancillary to residential development (for example car parking or amenity space). The overall developable area of the site is therefore limited by virtue of these restrictions as set out above.</p> <p>Whilst the site is adjacent to residential uses, due to its historic use and development of the site it does not provide a natural extension to the existing residential uses, this is compounded by the nobuild zones, which would result in isolated residential development.</p>	<p>The Council believes that the site is suitable and achievable for redevelopment as flatted housing development. Due to the abnormalities in the site, it may be an appropriate self-build site. Affordable housing requirements would be applied as per Policy HO4: Genuinely Affordable Housing.</p> <p>No proposed modifications</p>
Avison Young obo Aldi Store Ltd	<p>In Appendix F: Assessment of Pre-Submission Local Plan Sites (London Borough of Harrow) which accompanies the Regulation 19 Consultation, the following minor negative points are identified in terms of the proposed residential allocation:</p> <p>The site does not make provision of employment space or retail / town centre uses, nor does it lie in close proximity to a town centre. The development of this site is subsequently unlikely to benefit the local economy.</p> <p>An existing EV charger is over 600m of the site. The site subsequently does not support the shift to EV vehicles. Policy CN2: Energy Infrastructure requires the provision of EV chargers on site; however this requirement is dependent on car parking being proposed. As the site does not appear to provide car parking a potential minor negative effect is identified.</p>	<p>These minor negative scores do not preclude residential development from being an appropriate allocated use, such as residential. NPPF / London Plan policy and the Council's evidence does however preclude the site from being allocated for out-of-centre retail use as there is no justification for this.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>The site lies on land classified as 'urban' and is a mixture of brownfield and greenfield land. Development of the site would likely lead to a small portion of greenspace land being lost. The site is not within a groundwater protection zone or a historic landfill site. However, the historic use of the site as a gas holders may have potential contamination issues that require remediation.</p> <p>The nearest water course (Silk Stream and Edgware Brook) is 300m from the site, suggesting that water pollution as a result of construction may occur without appropriate site mitigation. However, Local Plan Policy CN4 Sustainable Drainage requires major development to ensure appropriate best practice is followed with respect to the control of water pollution. Therefore, a potential minor negative is identified.</p> <p>As set out above the site is not suitable for any form of residential development. Allocating the site for residential development is not effective and would therefore lead to a plan which is unsound.</p>	
Avison Young obo Aldi Store Ltd	<p>The effectiveness of the allocation is dependent on whether the land will be made available for development over the plan period, as this determines whether the allocation is deliverable. As previously indicated the Council has not discussed the site allocation with the landowner and therefore the allocation is not justified as it is not based on proportionate evidence due to these lack of discussions and understanding of the wider situation regarding the site.</p> <p>The site is currently vacant and, as detailed previously, Aldi has been in discussions with the Council regarding the development of the site for retail purposes since October 2022. The site is not available for residential development within the identified 6 to 10 year timescale and therefore the allocation of the site is unsound.</p>	<p>The Council considers that the site is available. It has been made clear to the landowner during pre-application discussions that retail on the site is not considered an appropriate use. The site constraints were known to the Council in allocating the site / uses and the allocation identifies these and takes them into account.</p> <p>No proposed modifications</p>
Avison Young obo Aldi Store Ltd	<p>As shown by Figure 2 below, the neighbouring SINC and Designated Open Space land is shown to be adjacent to the development site.</p> <p>In considering this proximity as part of the site assessment in Appendix F: Assessment of Pre-Submission Local Plan Sites (London Borough of Harrow) the assessment finds that: <i>“The site does not lie within close proximity to an SSSI or SSSI risk zone, TPO, or RIG. The site does intersect a SINC. Policy G13 Biodiversity provides mitigation as it highlights that any loss of biodiversity must be avoided through the development of this site, and provide 15% biodiversity net gain. Therefore, a neutral effect is identified”</i>.</p> <p>The site allocation specifically notes that: <i>“To the south of the site is Stanmore Marsh (with a small element to the west) which is a Site of Importance for Nature Conservation. All new development must be designed in a manner that addresses such a sensitive receiving environment in terms of light spill and other potential impacts on Stanmore Marsh”</i>.</p>	<p>This representation is unclear with respect to the point being made. Proximity to a SINC does not automatically preclude development of the site, but needs to be addressed in any design process and potential impacts identified and appropriately mitigated. The Council considers that the site is suitable for residential development.</p> <p>No proposed modifications</p>
Avison Young obo Aldi Store Ltd	<p>The site allocation makes reference to the need to refer to the Harrow Tall Building (Building Heights) SPD 2023, a summary of the considerations set out in this document and how they refer to this site are set out below. As set out above there is a lack of consistency in the proposed density (which can only be delivered through flatted development) and the intention to allocate the site for self-build housing.</p> <p>The Site is located within the Canons Park Neighbourhood Area as designated by the Harrow Tall Buildings SPD and lists the following building heights:</p> <ul style="list-style-type: none"> • Prevailing Height: 2 storeys Contextually High Building: Less than 4 storeys • Tall Building London Plan Policy D9: 6 storeys/ 18 metres <p>As acknowledged, the borough applies a contextual building height analysis as demonstrated by Figure 3 below. The prevailing height of the surrounding area of Marsh Lane are two storey detached / semi-detached residential properties and is acknowledged</p>	<p>For this site, as with all other relevant allocations, development capacities have been identified through the undertaking of design-led capacity assessment of each site allocation [following guidance set out in the Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023)]. The Council considers represents an appropriate method of identifying capacities within the Plan. The capacity study had regard to the Tall Buildings (Building Heights) SPD.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>as being suburban in character. Based on the Council’s own formula, the maximum height of a building that could come forward in this location would therefore be four storeys in height.</p>	<p>There is no reason why self-build cannot be at an appropriate (flatted) density (for example, communal self-build).</p> <p>No proposed modifications</p>
<p>Avison Young obo Aldi Store Ltd</p>	<p>If the whole site were available for development, a site density of 80 units per hectare could be achieved through the use of a flatted development however, the following points should be considered:</p> <ul style="list-style-type: none"> • The whole site is not available for development (due to easements and access rights), the residential target could not be delivered on the site in accordance with the Harrow Tall Building (Building Heights) SPD 2023; and • The Site Allocations identifies that the site may be suitable for self-build housing which would not comprise flatted development. 	<p>For this site, as with all other relevant allocations, development capacities have been identified through the undertaking of design-led capacity assessment of each site allocation [following guidance set out in the Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023)]. The Council considers represents an appropriate method of identifying capacities within the Plan. The capacity study had regard to the Tall Buildings (Building Heights) SPD. The representation appears to be based on the incorrect application of the Small Sites Capacity Study, which is not applicable to this site.</p> <p>There is no reason why self-build cannot be at an appropriate (flatted) density (for example, communal self-build).</p> <p>No proposed modifications</p>
<p>Avison Young obo Aldi Store Ltd</p>	<p>The Council published an Economic Needs Study Town Centres and Office Update (ENSTCOU) in January 2024. The site is located within Zone 4 (Harrow Northeast). As set out in Table 2 there is capacity for additional convenience goods floorspace within this zone. Paragraph 7.16 notes that <i>“the capacity projections for convenience goods retail floorspace in the north of the Borough (zones 3 and 4) relates to population growth, which suggests some new small scale facilities could be supported by housing developments in this area.”</i></p> <p>There is no reference to commitments within the ENSTCOU or suggested site allocations to accommodate the additional retail floorspace. Whilst capacity for additional convenience floorspace was identified in the ENSTCOU no specific sites that could accommodate this development were identified. Table 3 (below) provides a summary of sites identified within the Regulation 19 Consultation that include reference to the development of retail floorspace.</p> <p>Site allocation O11 (North Harrow Methodist Church) specifically makes reference to the sites ability to provide for a single convenience goods retailer such as a discount food outlet, with an 11 – 15 timeframe. This does not meet the requirement for additional convenience goods floorspace that has been identified now.</p> <p>Of the other sites identified these comprise redevelopment of existing facilities, where the existing tenant is expected to remain in situ, in any event no redevelopment plans exist for these sites and are not available within a reasonable period of time.</p> <p>In pre-application discussions reference has been made to Anmer Site (Site O21) which comprises an allocation for a mixed-use development to include a supermarket and circa 141 residential units with a development timeframe of 1 – 5 years. Planning</p>	<p>The study referred to concludes (paragraph 8.15): ‘The capacity projections in this update suggest there is no pressing requirement to allocate sites for major retail development to accommodate projected growth over the next 10 years’. Additionally, there is extant capacity for town centre uses on the nearby Amner Lodge site (O21).</p> <p>This site is not suitable for town centre uses as it is remote from town centres, and would result in unsustainable trip patterns and negative impacts on the shops within the surrounding centres. The allocation sought by the applicant is contrary to the town centres first approach at national and regional levels. Furthermore, to do so would be contrary to the evidence base informing the Local Plan. A significant proportion of the allocated sites / development capacity identified in the Local Plan are within town centres and</p>

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	<p>permission was granted in August 2014 to provide a supermarket of 1,692 sq m (gross) and 120 residential units along with associated works. In the 10 years since this permission was granted this development has not been delivered. It is understood that Marks and Spencer were to be the occupier of the convenience store, but they have since withdrawn from the scheme.</p>	<p>should unmet retail need emerge, this could be accommodated on those sites.</p> <p>No proposed modifications</p>
<p>Avison Young obo Aldi Store Ltd</p>	<p>Planning permission was granted for the development of the Anmer Lodge Site on 22 August 2014 (application reference P/0412/14). Since this time as set out in Table 4 (below), submissions have been made in relation to the discharge of conditions along with S96A and S73 applications.</p> <p>the excess of ten years since the permission was granted the development has not been brought forward. It is understood that the consent has been implemented as set out below: <i>“A number of pre-commencement conditions have been approved, the former Anmer Lodge building has been demolished, enabling works have been undertaken and the temporary car park has been constructed. The planning permission has therefore been implemented”.</i> (Paragraph 2.2, Planning Committee Report for application P/4221/18 dated 21 November 2018).</p> <p>It is noteworthy that the Council’s Economic Needs Study Town Centres and Office Update (January 2024) prepared by Lichfields does not include any reference to commitments or the consented Anmer Lodge scheme in considering the need for additional convenience goods floorspace.</p>	<p>Noted.</p> <p>No proposed modifications</p>
<p>Avison Young obo Aldi Store Ltd</p>	<p>There is currently only one Aldi store located within the London Borough of Harrow (South Harrow). Figure 6 (below) identifies the Aldi stores that are located within the Borough and adjacent authorities. The Household Survey that underpins the ENSTCOU is not available and therefore it is not possible to identify expenditure that is flowing out of the borough to Aldi stores elsewhere. Anecdotally we are aware that residents of the borough visit the store at Watford.</p> <p>Allocating the site for retail development will have a number of benefits, which have been acknowledged by the Council in the assessment of the sites within the Regulation 19 Consultation.</p>	<p>Noted. The IIA considered a range of objectives; the representation appears to be focusing on just those that appear to support their proposed use. Considered in a holistic, balanced sense and have regard to relevant national and regional policy, the site is not considered suitable for town centre uses given its location out-of-centre and the conclusions of the evidence base informing the Local Plan.</p> <p>No proposed modifications</p>
<p>Avison Young obo Aldi Store Ltd</p>	<p>Appendix F: Assessment of Pre-Submission Local Plan Sites (London Borough of Harrow) assess each of the identified sites against specified objectives.</p> <p><i>The specified objective is: “To deliver economic growth and support the creation of new business, whilst supporting the growth and retention of existing businesses”.</i></p> <p><i>The Assessment notes that: “The site does not make provision for employment space or retail / town centre uses, nor does it lie in close proximity to a town centre. The development of this site is subsequently unlikely to benefit the local economy. Therefore, a potential minor negative effect is identified”.</i></p> <p><i>The following mitigation is suggested: “Provision should be made on or near the site for retail / town centre uses, in order to provide some benefits to the local economy”.</i></p> <p>The allocation of the site for retail development would benefit the local economy and also provide for retail uses in an accessible location to existing, residential communities in order to provide benefits to the local economy.</p>	<p>Noted. The IIA considered a range of objectives; the representation appears to be focusing on just those that appear to support their proposed use. Considered in a holistic, balanced sense and have regard to relevant national and regional policy, the site is not considered suitable for town centre uses given its location out-of-centre and the conclusions of the evidence base informing the Local Plan.</p> <p>No proposed modifications</p>

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Avison Young obo Aldi Store Ltd	<p>The specified objective is: <i>“To create greater employment opportunities and higher value jobs for all ages across the whole borough”</i>.</p> <p>The following assessment is made in relation to the site: <i>“The site is located around 700m from an employment site, allowing residents of the site to access employment opportunities. As the site is located in an area of medium deprivation, provision of employment opportunities could subsequently also improve rates of deprivation in the area. The site does not make provision for employment space or retail / town centre uses however. Therefore, a potential minor positive effect is identified”</i>.</p> <p>Noting that the site is located in an area of medium deprivation the provision of accessible and varied employment opportunities in this location will provide wider economic benefits. Each store represents a minimum of £7 million in the local economy and creates up to 40 new FTE jobs. There is a focus on local recruitment with a majority of staff employed living within 1 mile of a store.</p>	<p>Noted. The IIA considered a range of objectives; the representation appears to be focusing on just those that appear to support their proposed use. Considered in a holistic, balanced sense and have regard to relevant national and regional policy, the site is not considered suitable for town centre uses given its location out-of-centre and the conclusions of the evidence base informing the Local Plan.</p> <p>No proposed modifications</p>
Environment Agency	<p>Historic gasworks sites represent a highly contaminative former use. This site will require detailed intrusive investigation to characterise any soil and groundwater contamination on site, and any development scheme will be required to fully establish the risks to controlled waters. Groundwater is particularly sensitive at this location as the site is located atop a Secondary A Superficial Aquifer (Alluvium).</p> <p>Further information regarding gasworks can be found at: http://webarchive.nationalarchives.gov.uk/20140328084622/http://publications.environment-agency.gov.uk/pdf/SCHO0195BJKP-e-e.pdf</p>	<p>Noted.</p> <p>No proposed modifications</p>

Allocation O20 – Canons Park Station Car Park

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	<p>The site is owned by TfL and so a separate response will be submitted by Places for London.</p> <p>The site has a PTAL of 2 – 3 and is adjacent to Canons Park Underground station, Due to the proximity to the station it is suitable for a car free residential development. The site objective should be amended to read ‘Housing development which improves access to Canons Park Station, while providing a sufficient level of car parking.’</p> <p>The allocated use ‘Car parking’ should be deleted as shown.</p> <p>In the development principles the following amendment should be made: ‘The site is suitable for partial residential development with retention of an appropriate amount of station car parking for disabled persons to help meet demand generated by commuters. Any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the retention or re-provision of car parking capacity on the site or elsewhere.’</p>	<p>The Council considers that there are many benefits with delivering public car parking at train/ tube stations. Doing so extends the catchment of those able to use public transport, thereby enabling multi-modal, rather than car-only trips. This in turn will reduce congestion.</p> <p>Some areas of Harrow, as well as the areas beyond Harrow do not have good public transport access, and the existence of car parking at stations is essential to enable them access to the option of public transport. This helps to drive up tube/train usage overall.</p> <p>The Council supports TfL’s position that new development at high PTAL sites such as this one should not have new end-user car parking. Parking should only be (re)provided to underpin the strategic function of the station and/or the District/ Metropolitan centre it sits within.</p> <p>Further, the Council supports any new parking being delivered as part of mixed use</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>development, including in multistorey format, to ensure the best use of land in the borough.</p> <p>Proposed Modification</p> <p>Housing development which improves access to Canons Park Station, while providing a sufficient level of car parking associated with the station and the development itself.</p> <p>Public car parking to support multi-modal travel.</p> <p>The site is suitable for partial residential development with retention of an appropriate amount of station car parking to support multi-modal travel on the Jubilee line help meet demand generated by commuters. Any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the retention or re-provision of car parking capacity on the site or elsewhere.</p>
LB Barnet	In regard to Site O20 (Canons Park Station carpark) LB Barnet would need to be assured that development here did not put unacceptable pressure on the A5/Whitchurch Lane junction, taking account of the proposed Edgware town centre development proposals. This may be in the form of a car-free development.	<p>Any detailed development proposals will be accompanied by a transport assessment (as required by Policy M1: Sustainable Transport) which will identify and mitigate any local transport impacts.</p> <p>No proposed modifications</p>
Places for London	We welcome the inclusion of this site allocation covering TfL / Places for London's landholdings. However, similar to our representations on the Rayners Lane SA above, there are a number of issues that render the draft SA to be undeliverable in its current form and the Plan would not be sound unless amendments are made.	<p>Noted.</p> <p>No proposed modifications</p>
Places for London	<p>Site Objective</p> <p>The Site Objective seeks “housing development which improves access to Canons Park station”. There is no physical or operational adjacency between this site and the underground station and housing development could not directly contribute to improving access to the station; this reference should be deleted. In addition, Places will not provide replacement car parking and therefore the reference to “providing a sufficient level of car parking associated with the station and the development itself” should also be deleted. We suggest the Site Objective is changed to:</p> <p>Housing development which makes the best use of the land and optimises the capacity of the site. improves access to Canons Park Station, while providing a sufficient level of car parking associated with the station and the development itself.</p>	<p>The Council considers that there are many benefits with delivering public car parking at train/ tube stations. Doing so extends the catchment of those able to use public transport, thereby enabling multi-modal, rather than car-only trips. This in turn will reduce congestion.</p> <p>Some areas of Harrow, as well as the areas beyond Harrow do not have good public transport access, and the existence of car parking at stations is essential to enable them</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>access to the option of public transport. This helps to drive up tube/train usage overall.</p> <p>The Council supports TfL's position that new development at high PTAL sites such as this one should not have new end-user car parking. Parking should only be (re)provided to underpin the strategic function of the station and/or the District/ Metropolitan centre it sits within.</p> <p>Further, the Council supports any new parking being delivered as part of mixed use development, including in multistorey format, to ensure the best use of land in the borough.</p> <p>Proposed Modification</p> <p>Housing development which improves access to Canons Park Station, while providing a sufficient level of car parking associated with the station and the development itself.</p>
Places for London	<p>Allocated Use The "<i>leading land use</i>" for the site is specified as "<i>Residential, car parking</i>". If this site is redeveloped as a housing opportunity, Places will not provide replacement car parking and therefore this reference should be deleted. We suggest that the 'Allocated use' is changed to:</p> <p>Leading land use Residential</p> <p>Limited replacement car parking with the aim to reprovide only where essential, for example for disabled persons or operational reasons</p> <p>This approach to car parking reflects the site's accessible location (close to the station and bus routes along Whitchurch Lane) and will encourage the use of public transport and active modes of travel. It is an approach to the development of station car park sites that has been accepted by the Local Plan Inspectors at the adjoining borough of Barnet. In addition, it is an approach accepted on appeal in respect of TfL car park development opportunities, as resulting in a significant reduction in local vehicular traffic and having an overall beneficial impact (eg. Arnos Grove, ref: APP/Q5300/W/21/ 3276466, paragraph 35).</p>	<p>The Council considers that there are many benefits with delivering public car parking at train/ tube stations. Doing so extends the catchment of those able to use public transport, thereby enabling multi-modal, rather than car-only trips. This in turn will reduce congestion.</p> <p>Some areas of Harrow, as well as the areas beyond Harrow do not have good public transport access, and the existence of car parking at stations is essential to enable them access to the option of public transport. This helps to drive up tube/train usage overall.</p> <p>The Council supports TfL's position that new development at high PTAL sites such as this one should not have new end-user car parking. Parking should only be (re)provided to underpin the strategic function of the station and/or the District/ Metropolitan centre it sits within.</p> <p>Further, the Council supports any new parking being delivered as part of mixed use</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>development, including in multistorey format, to ensure the best use of land in the borough.</p> <p>Proposed Modification</p> <p><u>Public car parking to support multi-modal travel.</u></p>
Places for London	<p>Indicative Residential Capacity</p> <p>The Indicative Residential Capacity' is said to be "26 C3 dwelling houses / units". This would not optimise the development opportunity provided by this underused site. Development at such low density would also not be viable, particularly given existing use value of the car park. In our 'call for sites' form, we estimate the site has capacity for 100 new homes (likely flats – we would not build houses here).</p> <p>As a benchmark, the 2021 planning application (LBH ref: P/0858/20) would have provided 118 affordable homes within three x seven storey buildings. Removing one storey (ie. down to six storeys) would provide 104 homes. Removing two storeys (ie. down to five storeys) would provide 84 homes. And removing three storeys (ie down to four storeys) would provide 64 homes. All far in excess of the draft SA '<i>indicative residential capacity</i>'. In reality, a new scheme for this site (which would not include replacement commuter car parking) would likely deliver deeper floor plates, larger building footprints and enhanced landscaping / setting; potentially enabling delivery of approximately 100 homes within shorter buildings. The SA capacity of 26 homes is clearly not in line with the London Plan requirements of policies D1, D3 and H1 to make the best use of land and optimise the capacity of sites. It must be increased substantially for the Plan to be 'sound'.</p>	<p>Development capacities have been identified through the undertaking of design-led capacity assessment of each site allocation [following guidance set out in the Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023)]. The Council considers represents an appropriate method of identifying capacities within the Plan. Further design work through the planning application stages will help to refine the capacity of each site as greater detail is added.</p> <p>No proposed modifications</p>
Places for London	<p>Development Principles</p> <p>The Development Principles will need to be amended to reflect the above. We suggest the following amendments to Paragraph 1: The site is suitable for partial residential development with retention of an appropriate amount of station car parking reprovided only where essential, for example for disabled persons or operational reasons. to help meet demand generated by commuters. Any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the retention or re-provision of car parking capacity on the site or elsewhere.</p>	<p>The Council considers that there are many benefits with delivering public car parking at train/ tube stations. Doing so extends the catchment of those able to use public transport, thereby enabling multi-modal, rather than car-only trips. This in turn will reduce congestion.</p> <p>Some areas of Harrow, as well as the areas beyond Harrow do not have good public transport access, and the existence of car parking at stations is essential to enable them access to the option of public transport. This helps to drive up tube/train usage overall.</p> <p>The Council supports TfL's position that new development at high PTAL sites such as this one should not have new end-user car parking. Parking should only be (re)provided to underpin the strategic function of the station and/or the District/ Metropolitan centre it sits within.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>Further, the Council supports any new parking being delivered as part of mixed use development, including in multistorey format, to ensure the best use of land in the borough.</p> <p>Proposed Modification</p> <p>The site is suitable for partial residential development with retention of an appropriate amount of station car parking to support multi-modal travel on the Jubilee line help meet demand generated by commuters. Any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the retention or re-provision of car parking capacity on the site or elsewhere.</p>
RAF Northolt	Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement, Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations.</p> <p>No proposed modifications</p>

Allocation O21 – Anmer Lodge

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
TfL	<p>The site has a PTAL of 2 – 3 and is located within Stanmore District Centre. It provides an opportunity to replace car parking with more productive uses that enhance the district centre. The site objective should be amended as shown: 'Mixed-use development of this under-utilised town centre site which includes a supermarket as well as a suitable level of residential use, while replacing car parking.'</p> <p>The allocated use 'Car parking' should be deleted as shown.</p> <p>In the requirements the following amendment should be made 'Appropriate level of replacement A limited amount of public car parking for the town centre.'</p>	<p>The Council agree that the parking requirement for the new uses on the site should be restricted in line with the London Plan's parking standards and Policy M2 of this Plan, other than for disabled users, due to the good PTAL in line with Policy M2. There is however, a need to ensure a sufficiency of convenient public car parking to support the role of the Metropolitan town centre.</p> <p>It is considered that this site currently offers public town centre car parking that underpins trips to the centre from areas not well served by public transport, thereby underpinning the vibrancy and vitality of the town centre.</p> <p>As such the Council considers there may be a requirement for public car parking on this site, and this should be reflected in the allocated uses</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>on the site. This is in line with London Plan Policy T6.3.</p> <p>Proposed Modifications:</p> <p>The site objective should be amended as shown: ‘Mixed-use development of this under-utilised town centre site which includes a supermarket as well as a suitable level of residential use, while replacing car parking.’</p> <p>The allocated use ‘Car parking’ should be deleted as shown.</p> <p>In the requirements the following amendment should be made ‘Appropriate level of replacement <u>A limited amount of public car parking for the town centre.</u>’</p>
Environment Agency	We believe using the term “Flood zone (Surface Water) 3a” is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.	<p>Proposed Modification:</p> <p>Replace Flood zone (Surface Water) 3a with:</p> <p><u>The site is at high risk of surface water flooding, particularly along the southeast of the site.</u></p> <p><u>Safe access and egress routes should be directed to the southwest of the site towards Rainsford Close and Coverdale Close where there is a lower risk of flooding. Development should be directed away from the southeast side of the site where there is higher risk of surface water flooding.</u></p>
RAF Northolt	Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily	<p>Noted, reference has been made to the RAF safeguarding zone in the Allocations’ Planning Considerations.</p> <p>No proposed modifications</p>

Allocation O22 – Stanmore Station Car Park

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Thames Water	On the information provided modelling may be required to understand the impact of development	Noted.

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Environment Agency	<p>We believe using the term “Flood zone (Surface Water) 3a” is confusing, as surface water is not distinguished by different zones, only by low, medium, and high. We recommend this is changed to use the scale aforementioned. to be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	<p>No proposed modifications</p> <p>Proposed Modification:</p> <p>Replace Flood zone (Surface Water) 3a with:</p> <p>Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.</p>
TfL	<p>The site is owned by TfL and so a separate response will be submitted by Places for London.</p> <p>The site has a PTAL of 2 – 3 and is located adjacent to Stanmore Underground station. Due to the proximity to the station it is suitable for a car free residential development. The site objective should be amended to read ‘Housing development which improves access to Stanmore Station, while providing a sufficient level of car parking.’</p> <p>The allocated use ‘Car parking’ should be deleted as shown.</p> <p>In the requirements the following should be deleted ‘Reprovision of suitable level of car parking for commuters and in connection with major events at Wembley Stadium.’</p> <p>In the development principles the following amendments should be made ‘The site is suitable for partial residential development with reprovision of an appropriate amount of station car parking for disabled persons. to help meet demand generated by commuters and in connection with major events at Wembley stadium. Any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the re-provision of car parking capacity on the site or elsewhere.’</p>	<p>The Council considers that there are many benefits with delivering public car parking at train/ tube stations. Doing so extends the catchment of those able to use public transport, thereby enabling multi-modal, rather than car-only trips. This in turn will reduce congestion.</p> <p>Some areas of Harrow, as well as the areas beyond Harrow do not have good public transport access, and the existence of car parking at stations is essential to enable them access to the option of public transport. This helps to drive up tube/train usage overall.</p> <p>The Council supports TfL’s position that new development at high PTAL sites such as this one should not have new end-user car parking. Parking should only be (re)provided to underpin the strategic function of the station and/or the District/ Metropolitan centre it sits within.</p> <p>Further, the Council supports any new parking being delivered as part of mixed use development, including in multistorey format, to ensure the best use of land in the borough.</p> <p>Proposed Modification</p> <p>The site is suitable for partial residential development with reprovision of an appropriate amount of <u>public</u> station car parking to help meet demand generated by commuters and in connection with major events at Wembley stadium. Any planning application for the redevelopment of the site should be supported by evidence of <u>public</u> car</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>parking demand and show how that demand will be met by the re-provision of car parking capacity on the site or elsewhere.</p> <p>Housing development which improves access to Stanmore Station while providing a sufficient level of public car parking</p>
LB Barnet	<p>The proposals at the Royal National Orthopaedic Hospital (RNOH) (Site Ref. GB1), Watling Farm (Site Ref. GB2) and Stanmore LU Station (Site Ref. O22) in particular could generate additional traffic on the A5, the A410 (Spur Road), the A41 (a TfL road) and place additional pressure on some already busy key junctions or on the M1. LB Barnet would generally resist anything requiring additional road capacity either on LB Barnet's roads – or on TfL or National Highways roads within the Borough either.</p>	<p>Noted, the Council will continue to work with LB Barnet to understand and address transport impacts from new development within both boroughs.</p> <p>No proposed modifications</p>
LB Barnet	<p>In regard to Site 022 (Stanmore Station carpark) access to this site from the east is via the A410 and LB Barnet would need to be assured that taken with any increased traffic from the RNOH and Watling Farm etc this did not put unacceptable pressure on the Canons Corner junction. Again, this may be in the form of a car-free development. The same concerns could arise with Site O21 (Anmer Lodge) however it is recognised this is further from Canons Corner, so may not have the same level of impact.</p>	<p>Noted, the Council will continue to work with LB Barnet to understand and address transport impacts from new development within both boroughs.</p> <p>No proposed modifications</p>
Places for London	<p>We welcome the inclusion of this site allocation covering TfL / Places for London's landholdings. However, similar to our representations on the Rayners Lane and Canons Park SAs above, there are a number of issues that render the draft SA to be undeliverable in its current form and the Plan would not be sound unless amendments are made.</p> <p>Site Boundary and Area</p> <p>The site boundary is incorrect. The land potentially available for development is more extensive than the Council shows. Although some of the land to the south east comprises SINC, this is within our ownership and may be utilised for amenity purposes, and / or act as a landscape setting for development and / or some of this land may be required to enable operations to continue at Stanmore station but any loss of SINC would be mitigated. The correct red line boundary is below (and please see our 'call for sites' form for further information).</p> <p>The correct site area is 3 ha.</p>	<p>Noted.</p> <p>Proposed Modifications:</p> <p>Update the site boundary</p> <p>Update the site area to 3 Ha.</p>
Places for London	<p>Site Objective</p> <p>The Site Objective seeks “<i>housing development which improves access to Stanmore station, while providing a sufficient level of car parking</i>”. In this case, development could help to improve access to the station and the red line should be extended to cover the area of land located to the west of the station entrance building to help enable this.</p> <p>Places is unlikely to provide replacement car parking and therefore the reference to “<i>providing a sufficient level of car parking</i>” should be deleted. We suggest the site objective is changed to:</p> <p>Housing development which improves access to Stanmore Station while providing a sufficient level of car parking</p>	<p>The Council considers that there are many benefits with delivering public car parking at train/ tube stations. Doing so extends the catchment of those able to use public transport, thereby enabling multi-modal, rather than car-only trips. This in turn will reduce congestion.</p> <p>Some areas of Harrow, as well as the areas beyond Harrow do not have good public transport access, and the existence of car parking at stations is essential to enable them access to the option of public transport. This helps to drive up tube/train usage overall.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>The Council supports TfL's position that new development at high PTAL sites such as this one should not have new end-user car parking. Parking should only be (re)provided to underpin the strategic function of the station and/or the District/ Metropolitan centre it sits within.</p> <p>Further, the Council supports any new parking being delivered as part of mixed use development, including in multistorey format, to ensure the best use of land in the borough.</p> <p>Proposed Modification</p> <p>Housing development which improves access to Stanmore Station while providing a sufficient level of public car parking</p>
Places for London	<p>Allocated Use</p> <p>The “<i>leading land use</i>” for the site is specified as “<i>Residential, car parking</i>”. If this site is redeveloped as a housing opportunity, Places is unlikely to provide replacement car parking and therefore this reference should be deleted. We suggest that the ‘Allocated use’ is changed to:</p> <p>Leading land use Residential</p> <p>Limited replacement car parking with the aim to reprovide only where essential, for example for disabled persons or operational reasons</p> <p>Supporting (or Alternative) land use(s) Transport operations Class E / industrial / warehousing / logistics</p> <p>This approach to car parking reflects the site’s accessible location (adjacent to the station and bus routes on the forecourt and London Road) and will encourage the use of public transport and active modes of travel. It is an approach to the development of station car park sites that has been accepted by the Local Plan Inspectors at the adjoining borough of Barnet. In addition, it is an approach accepted on appeal in respect of TfL car park development opportunities, as resulting in a significant reduction in local vehicular traffic and having an overall beneficial impact (eg. Arnos Grove, ref: APP/Q5300/W/21/ 3276466, paragraph 35).</p> <p>Our ‘call for sites’ form explains that TfL is currently considering the future of this site and may retain it for operational uses associated with the railway – we have therefore suggested ‘transport operations’ are added as a supporting or alternative use. In addition, commercial uses might be appropriate on the lower floor/s of buildings on this site, or as an alternative to housing development. Reference to Class E / industrial / warehousing / logistics has therefore been added. The Council may wish to add reference to Transport Assessment, vehicle tracking and ‘agent of change’ principles to ensure that any impacts for local residents are mitigated.</p>	<p>The site is not suitable for all of the uses proposed, it is suitable for higher density uses. This could potentially include some Class E local services offer.</p> <p>Proposed Modification:</p> <p>Supporting land use(s) Public Car parking Transport operations Class E</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Places for London	<p>Indicative Residential Capacity</p> <p>The Indicative Residential Capacity is said to be “183 C3 dwelling houses / units”. This would not optimise the development opportunity provided by this underused site. Development at such low density would also not be viable, particularly given existing use value of the car park. In our ‘call for sites’ form, we estimate the site has capacity for 275 – 300 new homes (likely flats, although a small number of town houses might be appropriate as part of a mix of typologies). As a benchmark, the 2016 (now superseded) version of the London Plan’s Table 3.2 <i>Sustainable residential quality density matrix</i> suggests that the upper end of suitable density here would be in the region of 360 – 510 homes (120 – 170 u/ha)⁵. Site capacity is reduced accordingly by part of it comprising SINC, nevertheless the Council’s suggested site capacity is far too low and is clearly not in line with the adopted London Plan requirements of policies D1, D3 and H1 to make the best use of land and optimise the capacity of sites. It must be increased substantially for the Plan to be ‘sound’.</p>	<p>Development capacities have been identified through the undertaking of design-led capacity assessment of each site allocation [following guidance set out in the Optimising Site Capacity: A Design-led Approach London Plan Guidance (2023)]. The Council considers represents an appropriate method of identifying capacities within the Plan. Further design work through the planning application stages will help to refine the capacity of each site as greater detail is added.</p> <p>No proposed modifications</p>
Places for London	<p>Requirements</p> <p>The SA ‘Requirements’ will also need to be substantially amended:</p> <p>Deliver high quality residential and / or commercial development if the site is no longer required for transport operations Reprovision of suitable level of car parking for commuters and in connection with major events at Wembley Stadium Contribute towards the provision of step-free access to Stanmore Station commensurate with the quantum of development</p>	<p>The Council considers that there are many benefits with delivering public car parking at train/ tube stations. Doing so extends the catchment of those able to use public transport, thereby enabling multi-modal, rather than car-only trips. This in turn will reduce congestion.</p> <p>Some areas of Harrow, as well as the areas beyond Harrow do not have good public transport access, and the existence of car parking at stations is essential to enable them access to the option of public transport. This helps to increase tube/train usage overall.</p> <p>The Council supports TfL’s position that new development at high PTAL sites such as this one should not have new end-user car parking. Parking should only be (re)provided to underpin the strategic function of the station and/or the District/ Metropolitan centre it sits within.</p> <p>Further, the Council supports any new parking being delivered as part of mixed use development, including in multistorey format, to ensure the best use of land in the borough.</p> <p>No proposed modifications</p>
Places for London	<p>Step free access (SFA) would not be necessary to make such a relatively small-scale residential development (up to 300 homes) acceptable in planning terms and is unlikely to be viable in association with such a small scheme. However, development adjacent</p>	<p>Noted.</p> <p>No proposed modifications</p>

⁵ Based on PTAL 2-3 and the 3 ha site being in an urban location (ie. predominantly dense development, mix of different uses, medium building footprints, typically buildings of two to four storeys, located within 400m of a District Centre and on a main arterial route).

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	to the station could safeguard land and help to enable improved SFA. We would, of course, also be happy to make a financial contribution towards SFA commensurate with the scale of development.	
Places for London	<p>Development Principles</p> <p>The 'Development principles' will need to be amended to reflect the above. We suggest the following amendments to Paragraphs 1 and 2:</p> <p>The site is suitable for partial residential development and / or commercial development potentially including Class E / industrial / warehousing / logistics. with re-provision of an appropriate amount of station car parking to help meet demand generated by commuters and in connection with major events at Wembley stadium. Any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the re-provision of car parking capacity on the site or elsewhere.</p> <p>Redevelopment of the site should enable facilitate step-free access to Stanmore Station, both from London Road and from the retained or replacement car-parking facility.</p> <p>To reiterate, the development of this site is unlikely to be able to pay for SFA in two locations; however, we would seek to enable it by safeguarding parts of the site that would be needed. We would also be happy to make a financial contribution towards SFA commensurate with the scale of development.</p>	<p>The Council considers that there are many benefits with delivering public car parking at train/ tube stations. Doing so extends the catchment of those able to use public transport, thereby enabling multi-modal, rather than car-only trips. This in turn will reduce congestion.</p> <p>Some areas of Harrow, as well as the areas beyond Harrow do not have good public transport access, and the existence of car parking at stations is essential to enable them access to the option of public transport. This helps to drive up tube/train usage overall.</p> <p>The Council supports TfL's position that new development at high PTAL sites such as this one should not have new end-user car parking. Parking should only be (re)provided to underpin the strategic function of the station and/or the District/ Metropolitan centre it sits within.</p> <p>Further, the Council supports any new parking being delivered as part of mixed use development, including in multistorey format, to ensure the best use of land in the borough.</p> <p>Proposed Modification</p> <p>The site is suitable for partial residential development with re-provision of an appropriate amount of <u>public</u> station car parking to help meet demand generated by commuters and in connection with major events at Wembley stadium. Any planning application for the redevelopment of the site should be supported by evidence of <u>public</u> car parking demand and show how that demand will be met by the re-provision of car parking capacity on the site or elsewhere.</p> <p>Redevelopment of the site should enable <u>facilitate</u> step-free access to Stanmore</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		Station, both from London Road and from the retained or replacement car-parking facility.
RAF Northolt	Development of, or exceeding, 91.4m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily	Noted, reference has been made to the RAF safeguarding zone in the Allocations' Planning Considerations. No proposed modifications

Appendix 1 – Glossary

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Metropolitan Police	Can I please ask that the wording “Secure by Design” should read Secured by Design, throughout the document to prevent any confusion	Noted and agreed. Proposed Modification: Change “Secure by Design” to “Secured by Design” throughout the document.
Metropolitan Police	“Secure by design - An approach to development design that works to improve the security of buildings and their immediate surroundings in line with published standard.” Can it please read as below? <i>Secured by Design- is part of the national Police Crime Prevention Initiatives, with particular focus on reducing crime in new builds and refurbishments, as well as space adjacent to the development. Within London, Metropolitan Police Designing Out Crime Officers (DOCOs) provide advice for free as part of the initiative.</i>	Noted and agreed. Proposed Modification: Change glossary entry from “Secure by design - An approach to development design that works to improve the security of buildings and their immediate surroundings in line with published standard.” To: Secured by Design - is part of the national Police Crime Prevention Initiatives, with particular focus on reducing crime in new builds and refurbishments, as well as space adjacent to the development. Within London, Metropolitan Police Designing Out Crime Officers (DOCOs) provide advice for free as part of the initiative

Comments on the Draft IIA

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Rosen House Residents	Concerned no minor/significant negative impacts have been identified against IIA objective 4 for health ; and IIA objective 7 : air, light and noise pollution (7) for any policies and sites. Key reasons are; building works and heavy traffic will significantly increase air and noise pollution, particularly for those living near sites :	The Local Plan Integrated Impact Assessment (IIA) assesses the potential effects of Local Plan Policies and site allocations against a set of economic, social, environment, health, equality

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>objectives (IIA Framework), and seeks to avoid/minimize/mitigate any adverse impacts to promote sustainable development.</p> <p>The IIA RAG assessment which informed the assessment of sites against IIA objective 7 considered a range of factors; such as whether the site was located within an air quality focus area, whether it is effected by existing noise and light pollution and it is located within a sustainable location (i.e. to reduce the need to travel by car and therefore limit potential increases in traffic-related air pollution), in order to assess the overall effects of developing a site. The assessment identified whether Local Plan policies contain sufficient measures to avoid increases in pollution or exposing new residents to pollution and any further measures which would need to be taken to avoid/minimise/mitigate any adverse effects via specific development requirements in Local Plan site allocation policies.</p> <p>A potential minor negative effect is identified in the IIA of Strategic Policy 03 Meeting Harrow's Housing Needs because the development of 16,040 homes over the plan period could contribute to additional air, noise and light pollution within the Borough.</p> <p>The IIA concludes that all the proposed site allocations, when assessed individually, are likely to result in a neutral effect against the IIA objective 7. Key reasons are Local Plan Policies GR7: External Lighting and GR1: Achieving a High Standard of Development will apply at the planning application stage of new development. This should help to ensure light, air and noise pollution levels are not exacerbated by the redevelopment of a site. Therefore, a neutral effect is identified.</p> <p>However, an uncertain cumulative effect is identified in the IIA in Table 12-2 (p133) against IIA objective 7 (Air, Light and Noise Pollution) in relation to allocation sites located in clusters</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>(e.g. in Harrow and Wealdstone). The effect of the development of sites could combine to create cumulative negative effects with regards to pollution (air, noise and light). Finally, an uncertain effect is identified as it's unclear whether the potential combined effects of pollution can be mitigated. Potential negative cumulative effects of the Harrow Local Plan combined with growth in neighbouring areas are also identified against IIA objective 7 (Air, Light and Noise Pollution) in Table 12-3 of the IIA Report. Identification, avoidance and mitigation of such potential effects will be addressed through the development control process which should ensure that requirements are implemented in individual developments relating to air, noise and light pollution.</p> <p>No proposed modifications</p>
Rosen House Residents	<p>The IIA assessment indicates a potential uncertain cumulative effect has been identified in assessment of sites against IIA objective 7(air, light and noise pollution), as it is uncertain whether the potential combined effects of pollution from sites that are clusters in areas like Wealdstone and Harrow can be mitigated ; as well as whether growth proposed elsewhere in the Plan could combine with this and increase traffic, emissions to air, and negatively effecting objectives IIA6 (sustainable travel) IIA 7(air, light, noise pollution) and IIA8 (climate change mitigation). Querying whether the Council has considered impact of these on the health of residents</p>	<p>The Local Plan IIA assessed the potential effects of Local Plan policies and site allocations against a set of economic, social, environment, health, equality objectives (IIA Framework), and seeks to minimize/mitigate any adverse impacts, to promote sustainable development.</p> <p>A Health Impact Assessment (HIA) is incorporated into the IIA. The IIA report clarifies that the relevant IIA objectives for considering health impacts are: IIA2, IIA3, IIA4, IIA5, IIA6, IIA7, IIA8, IIA9, and IIA13. The HIA indicates the Local Plan site allocations/policies will generally result in potential significant positive effects and no significant negative effects, against the above objectives.</p> <p>However, the HIA also notes (in Table 10-2) that : “ It is uncertain whether allocation sites in clusters (e.g. in Harrow & Wealdstone) could contribute to cumulative negative effects on air pollution. An increase to air pollution may disproportionately affect the young, the elderly,</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>those with underlying health conditions and those in lower socio-economic groups who are more vulnerable to the health effects of poor air quality.”</p> <p>The Local Plan includes policies (SP8, CN1 CN2) to minimise, mitigate any potential effects of development on air pollution e.g. the Local Plan requires residential developments in highly accessible locations such as the Opportunity Area (OA), to ensure they are car light or car free (i.e. PTAL 5-6), to reduce reliance on car. Development within the OA enables good access to local facilities, services via sustainable modes of transport and reduces need for private vehicle use; as well as includes measures to support electric vehicle use. Further, developments are required to be built to achieve net zero carbon, via being energy efficient and exploring potential inclusion of renewable/low carbon energy. In addition, mitigation for the uncertain cumulative effect identified within the IIA from allocation sites in clusters is specifically identified in Table 13-2 (p150). The identification, avoidance and mitigation of such potential effects will be addressed through the development control process which should ensure that requirements are implemented in individual developments relating to air, noise and light pollution. Overall the policy requirements should reduce/ mitigate any potential effects of development on air pollution in the OA.</p> <p>No proposed modifications</p>
Rosen House Residents	The above Local Plan IIA findings are against local and national strategies for the health and well being. For example, the EqIA for Living Harrow: The London Borough of Harrow’s Climate and Nature Strategy 2023-2030 (November 2023) indicated exposure to air pollution disproportionately effected affects socioeconomically disadvantaged populations including Black, Asian, and Multi-Ethnic communities. It has been linked to a range of adverse pregnancy outcomes (.i.e. low weight, early labour) that increase risk for conditions such as diabetes, cardiovascular disease. Exposure to air can also effect lung development/function and childhood asthma	Based on the baseline data (Appendix A) and a review of other Plans programmes (Appendix B), the IIA acknowledges that one of the issues facing the Borough is that air pollution can potentially result in a higher negative effect on the health of certain groups of the local community; such as the elderly, young children and those with underlying health issues, which can include those from ethnic minorities. As noted in the response above; the Local Plan policies include specific measures to reduce air

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>pollution from new development that can effect public health.</p> <p>The HIA that was incorporated into the Local Plan IIA concludes that the Local Plan policies will generally result in potential significant positive effects and no significant negative effects, against the relevant IIA objectives for assessing health effects of the Plan.</p> <p>No proposed modifications</p>
Rosen House Residents	The lack of/inadequate infrastructure and funding for additional primary, community and secondary healthcare services has not been highlighted in the IIA, even though this is an important consideration for increase's in population in/near the Opportunity Area.	<p>The IIA assessment of site allocations identifies where the Social and Community Infrastructure policies, and specifically Policy C11: Safeguarding and Securing Social Infrastructure, require development sites to make contributions towards the provision of enhanced or social infrastructure, in order to support new development.</p> <p>The Council worked closely with the NHS and other infrastructure providers to assess the potential impact of the future scale, location of housing growth on the capacity of existing healthcare infrastructure and whether any new/enhanced provisions are required via the production of the Infrastructure Delivery Plan. In addition, the NHS has been consulted in relation to Local Plan Policies and their responses have been considered via to inform the policies via the process.</p> <p>The IDP is a 'live' document that will continue to be updated over the course of the plan period, as detailed infrastructure cost information becomes available. The Council will continue to work with infrastructure providers to facilitate the delivery of infrastructure within the borough.</p> <p>Local Plan Policy SP6 will apply to proposals and ensure new/enhanced infrastructure is secured, funded and delivered as part of new development (where necessary).</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Rosen House Residents	The Plan seeks to protect the suburbs by directing most of the development to the Opportunity Area, including via new tall buildings. This puts the rights to a decent standard of living for residents in the suburbs above those within or near the Opportunity Area. This has not been highlighted in the equalities impact assessment.	<p>The Local Plan Spatial strategy directs a significant level of housing growth with the Opportunity Area and the secondary focus of this is to direct a lower proportion of housing growth to highly locations; such as within/edge of town centres, close to transport hubs and areas with a good public transport accessibility (.i.e. PTAL 3-6). This ensures good access to local facilities, services via sustainable modes of transport modes; as well as reduces private car usage, congestion and any potential effects on air quality.</p> <p>An Equality Impact Assessment was undertaken as part of the Local Plan IIA process, in line with the Equality Act (2010). This assessed the potential likely impact of policies on people sharing one or more of the protected characteristics (.i.e. age, disability, race, religion etc) and seeks to minimise any negative impacts. It seeks to ensure the Local Plan Policies/allocations do not have a discriminatory impact on people sharing certain protected characteristics, advances equality of opportunity and fosters good relations between different people. Hence, it is not the role of the EqIA to assess whether the proposed location of growth will have unequal impact on residents living in different parts of Borough. The respondent has not provided any details of whether any parts of the EqIA of Local Plan Policies or allocations may negatively effect people with any protected characteristics and if any issues need to be considered or changes are required.</p> <p>The EqIA concludes “the Local Plan policies and site options have resulted in positive effects across these objectives, with no significant negative or uncertain effects being identified. All protected characteristics (as outline in the Equality Act) are likely to benefit from the Plan”.</p> <p>No proposed modifications</p>
Bell Cornwall obo Old Millhillians	<i>Alternative 2 for Policy HO6: Support proposals within/edge of town centres (excluding neighbourhood centres)’ is discounted in the assessment because, ‘some town centres have a low public transport accessibility rating score’ and as such, ‘there is a potential risk this option may result in poor access to public transport and result in social isolation for older people’.</i>	The Council acknowledges there are different methods of assessing the relative sustainability of a site or location, based on transport

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>Concerned this may discount sites with a relatively low PTAL ratings even though they may have excellent access to the public transport network (e.g. client site PTAL 2/3). For example, TFL's WebCAT Time Mapping analysis (TIM) measures transport connectivity based on the extent a person can travel from a site in various time bands using public transport. This demonstrates a significant part of central London can be accessed from client site within 60 minutes, and Harrow Town Centre within 15-30 minutes (via Headstone Lane Railway Station, 0.1 miles north). The Councils preferred approach will fail to deliver specialist older person units on suitable, available, deliverable sites</p>	<p>consideration. However in line with London Plan (2021) it is considered more appropriate to utilise TFL PTAL data to inform the assessment of Local Plan policies/sites against the IIA objective.</p> <p>The Local Plan IIA (Reg 19) report indicates that the Councils preferred option for Policy HO6 scores a higher level of significant positive (i.e. housing, accessibility) and minor positive effects against the IIA objectives effects than Alternative 2 (including IIA4: Accessibility). This will ensure proposals are located within a accessible distance of local facilities/services (PTAL 3-6), so that occupants remain independent, healthy and are not socially isolated.</p> <p>No proposed modifications</p>
<p>Bell Cornwall obo Old Millhillians</p>	<p>The IIA discounts <i>'Alternative 3: Include a higher target to provide 165 units/total of 1,980 of accommodation for older people between 2017-29 (12 years) or 2,300 units over a 15-year period'</i>. The reason provided is that <i>'the rate of older people population growth is likely to reduce after 2029 and Policy H13 indicates Plans should take account of any local needs information'</i>.</p> <p>The above is contrary to the Local Plan evidence due to:</p> <p>(1) Local Housing Needs Assessment (LHNA) that indicates that the older population will continue to grow until 2035 and the Plan will need to provide 1980 (to 2029) or 3300 (to 2041) older person accommodation units (para 26). This is based on a bench mark of 165 units per annum (to 2029) included in the London Plan Policy H13 and the use of this would follow precedent set by other London Boroughs.</p> <p>(2) Figure 13 of the LHNA projects a significant increase (5400) in the people aged 75-84 and people aged 85+ (3000) between 2021-41 and not a fall in older person population after 2029</p> <p>(3) Table 1 of the Housing LIN study (2022) indicates the population aged 65+ will nationally increase by 21 % (2,2,242,124) based on ONS 2018 projections</p> <p>The demand for specialist older person accommodation will significantly increase in Harrow and should be met by an adequate planned supply of site to address this need. This should not be restricted to town centre locations, and reliant on two allocations and conversions/adapting of existing/new C3 units.</p>	<p>In line with para 63 of the NPPF (2023) and London Plan (2021) Policy H13, a target to deliver 980 specialised older person accommodation units between 2022-32 is proposed to be included based on a local needs assessment (i.e. LIN study). This is below the 165 units per annum benchmark figure (2017-29) included in policy H13, but the supporting text of this indicates this figure is designed to inform a local level assessment and this does not take account of a lower older people population growth after 2029. The LIN study is considered a robust assessment of need, based on modelling, good practice and research by experts.</p> <p>The Local Plan IIA (Reg 19) Report indicates that the Councils preferred option for Policy HO6 performs more positively, with more potential significant positive (i.e. housing, health) and minor positive effects against the IIA objectives than Alternative 3 that has recorded an uncertain effect for IIA5 (Housing) as this could undermine the Council's ability to meet other priority housing needs (such as family housing and affordable housing), leading to an over-provision of accommodation for older people.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
<p>Nexus Planning obo Taylor Wimpey</p>	<p>The minimum Local housing need for Harrow derived by the standard method is 2, 294 dwellings per annum (dpa). This is 186% or 1,492 dpa (186%) higher than the proposed London Plan Target of 802 and represents a significant shortfall against housing needs.</p> <p>The IIA identified two alternatives in addition to the preferred spatial strategy identified in Strategic policy SP3. These are; 1. Retain the adopted 2012 Core Strategy - 6050 (302 dpa) dwellings across the Plan period . 2. Enable the accommodation of a higher level of growth – 24,266 (1,213 dpa).</p> <p>Whilst the alternatives to Policy SP3 are 1. High housing growth of 24,266 (1213 dpa) and low housing growth 2. Low housing growth of 12,829 (641 dpa)</p> <p>Hence, the Plan is not supported by evidence assessing the implications of delivering a level of housing anywhere close to the minimum LHN. Due to paragraphs 60 and 61 of the NPPF (2023), the Plan cannot be concluded to be based on proportionate evidence and is unsound in accordance with paragraph 35b (NPPF 2023).</p> <p>The Plan failed to identify a rationale for discounting a high housing growth alternative and whether exceptional circumstances exist for the release of Green Belt land to address housing needs.</p>	<p>No proposed modifications</p> <p>The Local plan (SP3) is not proposing to include a housing requirement in line with the higher housing need figure derived by the standard method, as this would be contrary to the transitional arrangements for plan making (para 236) included within the NPPF (2024) and the London Plan.</p> <p>The Local Plan demonstrates that the Borough has sufficient housing capacity from a range of sources of housing supply to fully meet its housing needs, via prioritising PDL land in the most accessible, sustainable locations of the Borough that fall within the existing settlement boundary. In line with the NPPF (para 145, 146) and London Plan (2021), it is considered that no exceptional circumstances have been demonstrated to justify the release of Green Belt land to address future housing needs, nor is it necessary to do so as no Green Belt release is proposed.</p> <p>Therefore, the inclusion of a housing target/requirement option based upon a figure derived from the standard method and a strategy that proposes the release of Green Belt land are not considered to be reasonable alternatives. Hence, it is not considered appropriate to assess these via the Local Plan IIA.</p> <p>The reasons for selecting the preferred options for the housing requirement/target and Spatial Strategy within the Local Plan are clarified in detail within the IIA report</p> <p>No proposed modifications</p>
<p>Environment Agency</p>	<p>Recommend the topic Biodiversity, Geodiversity, Flora & Fauna, blue spaces (page 14) should be included with mention of an 8m buffer (riparian) zone for main rivers.</p>	<p>The comment refers to the assessment questions which, along with objectives, form the IIA Framework. The IIA Framework has been agreed following consultation on the scope of the assessment and has been used to assess the Reg 19 Local Plan and alternatives. The need for a 8m buffer (riparian) zone for main rivers is a</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>requirement of Policy CN5 Waterway Management and this is recognised within the IIA assessment of this policy. Therefore, no change to the IIA Framework at this stage is considered necessary.</p> <p>No proposed modifications</p>
Historic England	<p>As per our previous comments, we are content that most of the plans, policies and programmes relevant to the historic environment have been identified, and that an appropriate established an appropriate baseline. We are pleased to note that several of the amendments suggested by Historic England in response to the Regulation 18 consultation have been incorporated into this latest iteration of the Integrated Impact Assessment Report (IIAR). This includes amending the cultural heritage objective, widening the scope of the assessment questions, and actioning comments in relation to The Policies, Plans and Programmes (PPP) Review (IIAR section 4).</p>	<p>Noted.</p> <p>No proposed modifications</p>
Historic England	<p>Baseline (Appendix B Section 2.9) Satisfied an appropriate level of baseline information has been gathered, to inform IIA. The following corrections are still outstanding:</p> <p>(1) This indicates locally listed buildings are of importance due to their ‘local interest’. This should be changed to ‘local heritage significance’. locally listed buildings should also be mapped on Figure B.17.</p> <p>(2) This indicates Archaeological Priority Areas are protected because they are ‘historically beneficial’. This should be amended to explain that they are of evidential value and able to further our understanding of the past.⁶</p> <p>(3) A statement regarding ‘Local Areas of Special Character’ should be made and, for completeness, they should be mapped on Figure B.17 (provided that they are confirmed to be heritage assets - see the Appendix of our Local Plan response, comment HE40).</p> <p>(4) It would be beneficial if Figure B.17 also illustrated the assets currently on the Heritage at Risk register.</p> <p>(5) Figure B.17 should also refer to ‘Registered Parks and Gardens’ and not ‘Protected Parks and Gardens.’</p>	<p>These issues were raised at Reg 18 stage of the consultation and have previously been responded to and reviewed by the consultants preparing the IIA. Historic England’s comments relate to the Regulation 18 version of Appendix B due to a website error with respect to the Regulation 19 version.</p> <p>Actions for issues 1-5 have generally been completed in the revised Regulation 19 version. The only outstanding issues are;</p> <p>(a) The Council are in the early stages of designating Local areas of special character and due to this no maps currently exist for the boundaries of these as at the time of report preparation / consultation, the first two areas had not been approved for designation.</p> <p>(b) Further consideration / discussion with the IIA consultant in relation to why Locally listed buildings have not been mapped on Figure B17. Proximity to Locally listed buildings has been considered within the IIA assessments of sites and a GIS layer has been used by the consultants, as shown in the GIS RAG criteria table in the IIA Report (Table 2-6, p23).</p>

⁶ Archaeology can inform our understanding of past people and cultures but it can also inform our understanding of climate change and people’s adaptation to that change – be it successful or not.

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		<p>Any required modifications can be addressed when the IIA is updated as part of the Examination in Public Process.</p> <p>No proposed modifications</p>
Historic England	<p>Sustainability Issues (IIAR Section 5/ Table 5.1)</p> <p>Concerned that the sustainability issues relating to the historic environment have not been adequately identified and should be revisited. Key issues raised are:</p> <p>(1) The Assessment states that development is a risk to the historic environment. But the effects of climate change (e.g. increased extreme weather, rainfall, temperatures), adaptations and mitigations are also a risk to the conservation of the historic environment. For example, retrofitting to improve energy efficiencies of older buildings.</p> <p>(2) nature recovery proposals (including BNG, Green infrastructure) can be potentially be harmful, if the historic environment is not considered at the outset. Also changes in congestion, air quality, noise/light pollution and other experiential problems can also potentially effect the historic environment.</p> <p>(3) In addition, the IIA should consider opportunities. For example the historic environment can make a significant contribution to the success of developments, climate action, nature recovery and deliver social and economic benefits.</p>	<p>In line with SEA regulations, table 5 sets out an overview of the key baseline sustainability issues identified for Harrow and the evolution of them without the Plan.</p> <p>It is acknowledged that there may be other threats to the historic environment and heritage assets, in addition to development pressure that impacts their setting and significance. This can include climate change mitigations, increased car use and there may be potential benefits with the preservation of the historic environment (e.g. tourism, jobs). However, these detailed matters are covered by other sustainability issues/objectives already identified. It is considered that the IIA Framework assessment questions (from Table 2-3 of the IIA Report, reproduced below) adequately address conservation and enhancement of the historic environment, heritage assets and their settings within the power of the Local Plan:</p> <p><i>“• conserve and/or enhance heritage assets, historic environment, and their settings? • maintain and enhance access to cultural heritage assets? • ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to local character, townscape and context? • contribute to the better management of heritage assets and contribute to conserving heritage at risk? • improve the condition of the historic environment? • encourage heritage-led regeneration? • help provide solutions to those assets on the Heritage at Risk register?”</i></p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		<p>Detailed heritage matters will be considered for planning applications through the implementation of Local Plan policies via development management processes.</p> <p>No proposed modifications</p>
Historic England	<p>Performance of Heritage Policies (Section 7.4 of the IIA Report and Appendix D)</p> <p>(1) Query whether there can be such certainty over the reported beneficial effects of the strategic policies relating to the historic environment and suggest that the scoring might better reflect where this may be uncertain.</p> <p>(2) The minor positive effects for HE1 in relation to climate change are now absent and we would query this.</p>	<p>(1) The IIA is a high-level assessment of the potential effects of Local plan policies against a set of economic, social, environment, health and equalities objectives included within the IIA framework. It seeks to ensure the implementation of these minimises/mitigates any potential adverse effects and where possible increases any positive effects, in order to promote the sustainable development of the Borough. Policies HE1 and SP2 are predicted to result in potential significant positive effects against IIA objective 11 (Historic Environment) as these policies include measures that seek to ensure development proposals protect/enhance the significance of heritage assets and their settings. It is not possible to set out instances where parts of policy may result in uncertain effects, as this depends on place specific matters, the proposal and location.</p> <p>(2) The IIA performance of Policy HE1 against climate change (IIA9) changed between the Reg 18 assessment and the Reg 19 assessment due to changes to the wording of Policy HE1 (. i.e. minor positive to neutral). The relationship between climate change and heritage assets, including opportunities to support positive outcomes for both, are dealt with in Policy SP2 and the assessment of Policy SP2 identifies a potential minor positive effect against IIA9 Adaptation to Climate Change.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Historic England	<p>(1) Retain concerns over the minor positive effect on the historic environment as a result of GR4: Tall Buildings. Tall buildings in inappropriate locations or of inappropriate heights are one of the key threats to the historic environment and there are many located along the edge of Harrow on the Hill Conservation Areas.</p> <p>(2) The rationale regarding about protected views (Appendix D, p. 20), conflates visual amenity and heritage significance (see Regulation 19 comments). The comments indicate protected views are managed/assessed for their visual amenity, as well as can contribute to the understanding the significance of heritage assets. But visual impact assessments differ from heritage impact assessment as the former do not assess the effects on heritage assets</p> <p>(3) The Regulation 19 comments concerning the potential impact of basements (policy GR4A) should be considered in relation to the IIA. The comments raise a concern that construction of basements may have impact on archaeological remains. hence suggesting Local Plan should make it clear basement construction in archaeological priority areas will need to undergo consultation with the Greater London Archaeological advisory service and be accompanied by a desk-based assessment</p>	<p>(1) The IIA is a high-level assessment of the potential effects of policies against economic, social, environment, health and equalities objectives included within the IIA framework. It seeks to ensure the implementation of these minimises/mitigates any potential adverse effects and where possible increases any positive effects, in order to promote the sustainable development of the Borough. The Council acknowledges that tall buildings can potentially have an adverse effect on the significance of the heritage assets and their setting. However, policy GR4 seeks to ensure development of tall buildings proposals are well designed, located and protect/enhance the significance of heritage assets and their settings.</p> <p>(2) Agree, the issue raised in relation to the commentary and score of policy GR4 against IIA11: Historic Environment (appendix D page 20) may need further investigation to determine if any changes are required, particularly as a result of any subsequent proposed modifications arising in this statement or proposed through the EiP process.</p> <p>(3) Any modifications proposed as a result of representations will be considered to determine if this policy needs to be re-assessed against IIA 11: Historic Environment</p> <p>No proposed modifications at this stage</p>
Historic England	<p>Due to resource constraints, HE were unable to review and comments on the assessment of sites via the IIA. Suggest Reg 19 Local Plan consultation comments are referred to in relation to sites GB1 Royal Orthopaedic Hospital, Site O5: Harrow School Estate and John Lyon School, Site 13 Harrow Arts Centre , Sites 16 and 17 : Kodak , site 18 and site allocations in Harrow south and east and west</p> <p>Reiterate the point made above about demonstrating some uncertainty in the assessment findings. This is particularly relevant where there are locally listed assets in a site, as these are not afforded the same protection as designated heritage assets and may not be retained.</p>	<p>Noted, this can be considered in any updates to the IIA as part of the EiP process / final modifications.</p> <p>No proposed modifications at this stage</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	Highlight that not all developments can enhance or better reveal the significance of a heritage asset, any assessment should therefore be more focused on the conservation of the asset's significance. Also improving the surroundings of a heritage asset does not constitute an enhancement in heritage terms, unless the surroundings changed demonstrably contribute to the significance of the asset.	
Natural England	Natural England confirmed via email (31/01/25) they have no specific comments on the Local Plan Integrated Impact Assessment and Habitats Regulation Assessment Documents, and are satisfied with the findings of these.	Support welcomed

Sites not in R19 Plan

Land West of Headstone Lane

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Bell Cornwall obo Old Millhillians	<p>We note that the site promoted as part of the Regulation 18 (Stage 2) Consultation and Call for Sites exercise 2024 has been excluded during the Council's site assessment due to its location in the Green Belt. However, we believe that the site, which is deliverable, as defined by the NPPF, available and in a fit for purpose and achievable location for a specialist older person housing development that could be delivered in the next five years. We therefore reiterate the development opportunity of the site below.</p> <p>The site, outlined in red in Figure 3 below. The site has a total area of approximately 15 ha. Part of the site comprises previously developed, brown field land.</p> <p>The site comprises a collection of land parcels to the north and south of an unnamed bridleway taken off Headstone Lane, Harrow. The Site is located entirely within the Green Belt as defined by the Council's adopted Policies Map (2013) but arguably in an area which would have minimal adverse local community impact and no loss of sporting facilities if allocated to fulfil this important need for older person residences.</p> <p>Moving east to west, the site comprises a garden centre and timber yard, sports pitches and club houses and agricultural fields. The Site is bound to the north by existing mature woodland and a railway line, to the east by another sports field and garden centre beyond and to the south and west by open farmland.</p> <p>The topography of the Site appears relatively flat and is largely undeveloped. Vehicular access is currently taken from a single priority bridleway off Headstone Lane but we refer you to Appendix 1 to our Regulation 18 submission (Site Access Feasibility Note) which sets out in detail essential improvements for access.</p> <p>A review of the Environment Agency Flood Map for Planning confirms that the site is located within Flood Zone 1. This equates to a 1:1000 probability of flooding in any given year and is the lowest risk zone.</p> <p>The site is not located within a Conservation Area or Area of Outstanding Natural Beauty (AONB). There are no Tree Preservation Orders ('TPOs') or other environmental designations. The Site is not constrained by any designated heritage assets.</p> <p>The site is in an inherently sustainable location, with good access to public transport services being located within easy walking distance from Headstone Lane Railway Station (Overground serving Euston and Watford and the Bakerloo line) and a range of bus services (H12, H14, H18 and H19). It is also within walking distance of a range of shops, Headstone Lane Medical Centre, three restaurants and other services. The Site has a Public Transport Accessibility Level "PTAL" rating of 2/3 but supermarkets such as Lidl and Waitrose are a 6 minutes' drive to Harrow and Sainsbury and Morrisons are a 9 minute drive to Pinner. In any event, our client envisages that a specialist provider of retirement villages would ensure that relevant services and leisure facilities would be an integral part of any development.</p>	<p>The Council is has not undertaken a green belt review as part of this Local Plan nor does it consider one is necessary under the NPPF 2023 and the London Plan. Therefore development of this site for housing would represent inappropriate development. The applicant has not demonstrated exceptional circumstances (under the NPPF 2023) to warrant removal of the site from green belt. The draft Local Plan identifies that the Council considers it can demonstrate a five year housing supply.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>In terms of the wider context, the surrounding land uses are a mixture of existing residential and commercial uses and agricultural land. It forms part of a slight anomaly in terms of Green Belt designation in that it is part of an area of land surrounded by built development.</p> <p>Given the above, our client's site would be completely appropriate for specialist older people housing development and should be considered as an additional allocation.</p>	

Land at Headstone Lane

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Carney Sweeney for Barwood Land	<p>These representations focus on the reconsideration of the Land at Headstone Way as a residential allocation in the emerging Local Plan. We note that allocation of the site has been discounted solely on the basis that it is in the Green Belt with no further consideration of the benefits the site or the future delivery issues of other sites in the Borough.</p> <p>The Council latest Annual Monitoring Report (AMR) relates to 202/21, and is therefore over 2 years out-of-date, albeit information on housing completions is provided in the London Plan Annual Monitoring Report (March 2024). The Council's emerging Local Plan does not provide an up-to-date Housing Land Supply position based on the new allocated. We consider that this approach is not Sound and should be addressed.</p> <p>The Local Housing Need (LHN) requirement of 3,801 dwellings over the 5-year period is set by the London Plan, which equates to 760 dwellings per year. On current evidence, it makes it difficult to calculate the current status of Housing Land Supply. Based on the Council AMR, the Borough can demonstrate a 6.47-year supply of housing against the relevant requirement, with a 5% buffer added.</p> <p>The Council's AMR provides a list of development sites that are included within its housing supply trajectory over the 5-year period. We have reviewed the individual sites referred to in the housing trajectory to assess if they comply with the NPPF definition of a deliverable site. Where sites are not considered to be deliverable, we have deducted them from the trajectory to give a revised HLS figure. This amounts to 1,561 dwellings, reducing the Housing Land Supply to 4.52 years. This does not account for the additional allocations made in the current consultation document.</p> <p>We have also reviewed the latest Housing Delivery Test (HDT) results and potential future trends of the supply of homes in the Borough, i.e. if delivery is likely to improve or worsen. The London Plan Annual Monitoring Report 19 2021/22 dated March 2024, provides details on the housing completions in Harrow 2017/18 to 2021/22, showing a 5-year average of 849 dwellings, which is above the required 760 dwellings. Notwithstanding this, the latest figures show a significant decline in delivery as set out in Table 2.1.24 of the Report.</p> <p>Based on the latest data, and market predictions that this declining trend is likely to be maintained, the emerging Local Plan needs to carefully consider the deliverability of all sites included in its existing HLS, together with the sites put forward.</p> <p>The Headstone Lane site provides an excellent opportunity for a deliverable brownfield site in a sustainably located position with excellent access to green space and schools amongst other amenities and should be considered on this basis.</p>	<p>The Council is has not undertaken a green belt review as part of this Local Plan nor does it consider one is necessary under the NPPF 2023 and the London Plan. Therefore development of this site for housing would represent inappropriate development. The applicant has not demonstrated exceptional circumstances (under the NPPF 2023) to warrant removal of the site from green belt. The draft Local Plan identifies that the Council considers it can demonstrate a five year housing supply.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>The Council has a critical shortfall of affordable housing in Harrow, with a focus on family accommodation. There is also a shortfall of accessible recreational open greenspace. Barwood Land will commit to the delivery of 50% affordable housing on the Headstone Lane site, providing an excellent opportunity to deliver fit-for-purpose family accommodation for the most vulnerable residents of the Borough, with direct access to usable green space. This should be a key consideration when determining appropriate allocations in the emerging Local Plan.</p> <p>The site is in the designated Green Belt, which is the key consideration in dismissing the site for allocation. It is our understand that the Council does not hold a copy of the original Green Belt Assessment carried out in the 1980's and therefore has not knowledge of the basis the site forms part of the designation.</p> <p>We consider that the site does not meet the five key purposes of the Green Belt, which remain in the recently published version of the National Planning Policy Framework.</p>	

The Hive, London

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
<p>Greg Dowden of BDP for the Hive Estate London</p>	<p>The Hive, London was allocated for sport and leisure use in the Harrow Local Plan Core Strategy was adopted in 2012. It was also allocated in the Site Allocations Local Plan (2013). However, it has become increasingly clear that the Council will not support sport and leisure development on the site. It has consistently sort to delay and prevent sports and recreations development that complies with the Core Strategy and site allocation. The Council has recently refused two applications for artificial grass pitches on the site (LPA ref: P/4395/22 and PL/0691/23).</p> <p>Although The Hive provides some of the best quality sports facilities in the Borough and remains an important sports and leisure destination, it is clear that the Council no longer recognises the value of The Hive. It is not even mentioned in the Regulation 19 Plan, even in passing. If the Council will not support sport and leisure development at the site, the best use should be made of it and it should be developed for housing.</p> <p>The open areas at The Hive have no real public value. The site is private and could be closed off It is discreet and does not act as visual amenity. It is in an area with a good supply of open space.</p> <p>In short, the Hive has no real value as open space. In short, unless the Council show commitment to supporting sport and leisure development on the site, it should be allocated for much needed housing.</p> <p>For these reasons, we object to The Hive's designation as open space, and the open space designation should be removed. The Council have consistently used the open space designation to seek to prevent appropriate sports and leisure proposals coming forward, including artificial grass pitches and ancillary development which supports the functioning of existing and proposed facilities, including Barnet FC's stadium.</p> <p>Approximately half of the site is already developed. It includes a football stadium, and consent was granted in 2019 for (inter alia) an indoor 3G pitch and a new indoor sports hall (LPA ref. P/2763/17).</p> <p>The Hive should either be allocated for:</p> <ul style="list-style-type: none"> • Sport and leisure use and development, including indoor sport; or • Housing; or 	<p>The Council considers that the site has considerable value as an open space (which can be either public or private), and that development that would compromise this (such as housing) should not be supported in the Plan.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<ul style="list-style-type: none"> A mixture of both – the southern part of the site (Areas A and B) should be allocated for indoor and outdoor sport and leisure development and the northern part of the site (Areas C and D) should be allocated for housing 	

Potential Kenton Rd Intensification Area

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Savills obo Unibar Ltd	<p>The Kenton Road is a sustainable area that should be a focus for new housing and commercial growth. Kenton Road (the A4006) is a main road in the London Borough of Harrow (LBH) and the London Borough of Brent (LBB), dissecting the two local authorities. The road is well served by a range of services and amenities, and is considered to be a key route for both Boroughs due to its strategic location and accessibility credentials. This has been identified within Brent's Local Plan 2019-2041 (adopted in 2022) that designated Kenton Road as an 'intensification corridor' to direct growth of increased height and density toward due to its advantageous sustainability characteristics.</p> <p>Intensification corridors are priority areas for additional housing as set out in Policy BH2 of the Brent Local Plan. We fully endorse this policy.</p> <p>In our view the LBH Regulation 19 plan does not share the same ambition for growth although it is located opposite the Intensification Corridor.</p>	Noted. The spatial strategy is to direct the majority of growth into the Harrow & Wealdstone Opportunity Area. However, growth will be supported in sustainable locations outside the Opportunity Area where appropriate to the context within which it is located.
Savills obo Unibar Ltd	<p>The draft proposals map identifies Kenton Road as a Neighbourhood Parade which is defined as a Purpose built small rows of shops along a road and outside of larger designated town centres, serving the convenience retail and other day-to-day needs of the immediate neighbourhood. Draft Policy LE1 Development Principles and the Town Centre Hierarchy.</p> <p>Notwithstanding the strategic capacities of the road, Harrow's draft plan does not principally identify Kenton Road as an area to direct growth toward by way of policy provision or designation. Contrary to this however, the evidence base (Harrow Characterisation and Tall Buildings Study (August 2021) prepared to inform the draft plan identifies Kenton Road as a 'Minor Corridor', described as an opportunistic area to intensify and direct growth toward due to its high levels of sustainability.</p>	The spatial strategy is to direct the majority of growth into the Harrow & Wealdstone Opportunity Area. However, growth will be supported in sustainable locations outside the Opportunity Area where appropriate to the context within which it is located.
Savills obo Unibar Ltd	<p>Harrow Characterisation and Tall Buildings Study (August 2021)</p> <p>¶ Paragraph 6.2 (Neighbourhoods: Key Features, Issues and Opportunities) states: "Opportunities along Kenton Road to repair, intensify and improve the quality of this route"; and ¶ Paragraph 6.4 (Appropriate Typologies) states: "The A5 corridor is a key route running along the edge of the borough. Other more minor corridors include (Author's Emphasis)Honeypot Lane, Kenton Road, Marsh Lane and London Road. Due to the enhanced accessibility of these routes, they provide sustainable locations for growth. Often these routes are wider and could therefore benefit from development of a more significant scale to balance the width of tarmac".</p>	The spatial strategy is to direct the majority of growth into the Harrow & Wealdstone Opportunity Area. However, growth will be supported in sustainable locations outside the Opportunity Area where appropriate to the context within which it is located.
Savills obo Unibar Ltd	<p>In alignment with the above evidence base, the draft plan sets out site allocations O16 (Travellers Rest, Kenton Road) and O17 (Kenton Road Telephone Exchange) for development, both of which are located along Kenton Road. These allocations are considered to endorse the suitability of Kenton Road to be identified as an area to direct growth toward by way of policy representation and / or designation. Further to this, this representation is supported by a research study for the intensification of Kenton Road has been prepared by Autor Architecture Ltd, to demonstrate how the relevant policies of both Councils could materialise in re-imagining the character of Kenton Road. The report identifies that there are number of sites that could accommodate additional growth if they were supported by planning policy.</p> <p>In light of the above therefore, this representation proposes amendments to the plan that look to appropriately identify and designate Kenton Road for intensification due to its strategic and sustainable positioning.</p>	The spatial strategy is to direct the majority of growth into the Harrow & Wealdstone Opportunity Area. However, growth will be supported in sustainable locations outside the Opportunity Area where appropriate to the context within which it is located.

52-60 Palmerston Road

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
<p>Third Revolution Projects for Kosy Living</p>	<p>On behalf of our client ‘Kosy Living’ we are writing in response to the current consultation of the new Harrow Local Plan. Kosy Living are promoting land at 52-68 Palmerston Road for a co-living development. The proposal is to demolish the existing buildings on site and construct a building providing 148 co-living units with light industrial use at the ground floor level. These would comprise the equivalent of 82 traditional C3 units. This figure is calculated by using the figures set out in the Government’s Housing Delivery Test Measurement Rulebook, which states that “the comparative ratio applied to communal accommodation will be based on the national average number of adults in all households, with a ratio of 1.8:1”. In this case, applying the 1.8:1 ratio would mean that the 148 co-living units proposed equates to 82 traditional C3 units.</p> <p>Kosy have designed a deliverable proposal which is currently progressing through the pre-application process. It is therefore well progressed and could be delivered swiftly. This response is accompanied by the DAS, the Townscape Report and the Planning Report which formed the second pre-application submission.</p> <p>Our client has experience developing and operating a number of co-living housing schemes across London. Although the final product varies between operators, this form of housing essentially provides smaller studio units with shared facilities for residents. This model of housing provides accommodation for a range of ages groups, but primarily focuses on single households in their twenties or thirties that may be unable to buy due to high housing prices and are unable to afford a rental property alone.</p> <p>The building remains in single ownership which allows management of the site and shared facilities. Therefore, it not only provides more affordable and quality housing option, but also offers a communal living experience for residents. These shared facilities vary with each operator and their target market, but typically include shared kitchen and dining spaces along with study spaces, gym, or entertainment spaces.</p> <p>This is a relatively new form of housing although there are now a number of operational projects across the capital that clearly demonstrate how this model of housing works. We appreciate that there has been a need for regulation of this housing to ensure that appropriate standards of housing are still provided and indeed, it is in the operators interest to provide quality accommodation as they retain and manage the asset.</p> <p>Co-living is a sustainable form of development which is an effective use of land and also helps to promote strong vibrant and healthy communities. Our client welcomes Harrows initiative on and developing a policy on this topic, in line with other boroughs and the Greater London Authority (GLA). This provides developers and investors with some clarity on the expectations of the Council when choosing to invest in the borough. Our client has previously engaged with the LPA in respect of the emerging local plan and also call for sites.</p> <p>We support the Councils work in progressing the Local Plan to this final stage before submission to the Planning Inspectorate for examination. The need for a Local Plan that supports the growth of the borough is fully supported by the NPPF and it is this document that will be used to determine that the plan is sound.</p> <p>We have reviewed the current ‘Reg 19’ draft Harrow Local Plan with a particular focus on polices specific to large-scale purpose-built shared living (LSPBSL) - Policy HO9 for LSPBSL; and OA13 Site allocation that includes our clients site (52-74 Palmerston Road, Harrow, HA3 7RW). Regarding the plan-making process, the NPPF (2024) para 16 states among other points, that plans should be ‘prepared positively, in a way that is aspirational but deliverable’ and avoid ‘unnecessary duplication’. The NPPF (2024) para 36 also sets out the tests of soundness and these tests will ultimately form the basis of the forthcoming Examination of the Local Plan by the Planning Inspector. Para 36 specifically requires plans be ‘positively prepared’ and that policies in the plan are justified, effective and consistent with national policy. We provide the following comments with these NPPF principles in mind.</p>	<p>The site is in functional, active industrial use, and is designated as LSIS, and the Council is not seeking to de-designate this use in this Plan, consistent with the Council’s evidence base relating to employment / industrial land.</p> <p>The LHNA (SHMA) did not identify any specific requirements to provide LSPBSL to address any local needs, as the younger population (aged 25-44), single households, and student population are not projected to increase, and the area lacks a significant existing student population. It indicates a high priority to increase the delivery of family sized and affordable housing, as well as a lack of need to provide smaller sized units. Further, the Council’s housing register indicates there is a significant unmet need for family sized housing. Due to this the Council is increasingly reliant on emergency temporary accommodation to house homeless families (i.e. B & B, hotels) due to the acute shortage of family housing</p> <p>In response to the above evidence, Policy HO9 set out a positive approach for LSPBSL proposals. It seeks to achieve a balance between the delivery of smaller LSPBSL units that could increase housing delivery and options to address housing needs, within highly accessible locations of the Borough. It also however seeks to ensure the right, type, size of units are delivered to address higher priority housing needs (.i.e. Family sized and affordable) and support mixed and inclusive communities,</p> <p>In line with the NPPF (Para 60, 63), Criteria Aa of Policy HO9 ensures a sufficient amount and variety of land comes forward to address the future housing needs of groups with specific requirements in terms of size, tenure and type of housing. The key requirement for the area is self-contained family and affordable housing. It also ensures there is not over supply/over concentration of LSPBSL, if the market conditions change and delivery of self-contained</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>Looking at the policy context for this form of housing, the NPPF (2024) is silent on this housing type specifically. However, the overall aim is to 'meet an area's identified housing need, including with an appropriate mix of housing types for the local community' (Para 61) and the need should include a variety of 'size, type and tenure of housing ... for different groups in the community' (Para 63). Chapter 11 of the NPPF clearly promotes the efficient use of land (para 124) with a focus on town centre locations well served by public transport (Para 130(a)).</p> <p>The London Plan (2021) provides the over-arching strategic policy direction for London. Policy H16 refers to LSPBH schemes and recognises them as a form of housing for those that 'cannot or choose not to live in self-contained homes or HMOs' and is seen as an alternative to traditional flat shares. The policy seeks to ensure that such developments provide acceptable quality and well-managed living for residents. As a strategic planning policy, it is therefore ideally placed to provide specific spatial requirements and on this matter the policy requires development to 'contribute towards mixed and inclusive neighbourhoods' and be 'located in an area well-connected to local services and employment ... and is not car dependant'. It does not seek to contain the location/number of LSPBSL.</p> <p>The LSBPSL Guidance (2024) however goes into more detail on both the location and design of such schemes, albeit it is 'guidance' and not policy as such. Regarding their location, the Guide reiterates policy H16 that they be in 'well-connected, well-served areas'. These should be metropolitan or major town centres, areas of PTAL 5 or 6 or 'other town centres with high or medium growth potential' and car free. Such locations 'may be refined further by Local Plans according to their wider spatial and housing strategies.'</p> <p>The guide recognise that this form of housing can have mixed results on a neighbourhood. While it can add to a housing mix where this type of development is lacking, it can also been seen to 'crowd out' conventional housing schemes and affect the boroughs ability to meet a range of needs. With reference to plan making, the guidance states (paras 2.2.4 and 2.2.5)(emphasis ours):</p> <p>'Local Plans should identify where spatial or delivery concentrations of LSPBSL (relative to conventional housing) may be emerging and impacting on the ability to ensure mixed and inclusive neighbourhoods. This information could be used to develop spatial policies, or to indicate the significance of neighbourhood or pipeline housing mix in decision-making. In areas where demand for LSPBSL is likely to be particularly high, and this could have a negative impact on creating mixed and inclusive neighbourhoods, local planning authorities may, with appropriate evidence: introduce a local policy framework that limits the number of developments or units within a defined area; ensure separation; or focus LSPBSL in specific places. More positively, they can identify areas where LSPBSL could be beneficial as part of the housing mix. Any such policy should be sufficiently flexible to ensure any limits are not applied arbitrarily.'</p> <p>It is clear from national, regional and local policy that there is a requirement to plan spatially for various types of housing; and when doing so, there are several points to keep in mind:</p> <ul style="list-style-type: none"> ▪ LSPBSL is defined as 50 units or more and therefore logically it is not of a scale that is suited to low-rise suburban areas. ▪ This housing model focuses on the younger more mobile population suited to town centres locations with access to bars, pubs, entertainment and good connections to other town centres. These locations are not areas suitable for conventional family housing. ▪ Proposals are required to be car-free and required in policy to be well served by public transport (PTAL 5 or 6). <p>Logically then, LSPBSL should be located in town centres with a high PTAL and access to services. The London Plan guidance also suggests three spatial measures that could be used in plan-making for LSPBSL. These are measures are proposed as</p>	<p>housing is not compromised by the LSPBSL developments within the Opportunity Area that is expected to accommodate a significant proportion of housing needs. In line with the London Plan Policy H16, this will help deliver mixed and inclusive communities) in the Opportunity Area, particularly in parts where a high level of smaller sized unts have been delivered, including via prior approvals.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<p>separate measures (i.e. not used collectively); and are to be applied not just where there is a demand for LSPBSL, but where the demand is expected to impact negatively on neighbourhoods. Furthermore, these policies must be applied flexibly with no 'arbitrary limits' and must be supported by appropriate evidence.</p> <p>LSPBSL and LBH housing need</p> <p>The Harrow Local Housing Needs Assessment update from February 2024 is an evidence document which informs the plan. This concludes that there is a limited demand for single housing and an increasing demand for family housing.</p> <p>However, there are some more detailed conclusions within the report. These set out some useful information about co-living, concluding that whilst a small decline in single young person households is projected, co-living could be a policy led response to the increasing lack of housing for younger people in the area. Schemes could have a role in short term housing for groups such as recent graduates looking to establish themselves in Harrow as an alternative to living in HMOs.</p> <p>A further matter discussed in the report and supporting text in the policy is that if there is a sufficient supply of high quality housing for single persons or couples then this may free up family sizes accommodation which is currently occupied by sharing young households living in multiple occupancy. Purpose built co-living is described as meeting the needs of some single people and couples as a short-term lifestyle choice before they move to more permanent accommodation</p>	

John Lyon Playing Fields at Sudbury Hill

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
JLS obo John Lyon School	<p>The John Lyon School Playing Fields at Sudbury Hill lie to the south of Harrow Hill, and fall outside the proposed O5 allocation. John Lyon School have aspirations to improve the Playing Fields, and increase community access to them. To support this, John Lyon School have instructed Rapleys to prepare the planning statement enclosed with this letter, requesting that the local authority consider part of the site for residential development, to support a package of measures including:</p> <ul style="list-style-type: none"> • Improvement of the sports pitches, and facilities on the site generally, and • Residential development, focused on areas of the site that are, or are adjacent and well related to, land that is already previously developed. <p>Such development would:</p> <ul style="list-style-type: none"> • Assist the local authority in meeting the ambitious housing targets that have been set through the London Plan and the New Local Plan, and • Improve the sporting facilities at the site, as well as the quality and accessibility of MOL with greater community access, that will support the Harrow Indoor and Outdoor Sports Facilities Strategy. <p>In this context, these representations:</p> <ul style="list-style-type: none"> • Review the site and its surrounding context; • Identify planning policy, at national and regional level, to plan-making in terms of housing delivery and MOL; 	<p>The Council considers that the site has considerable value as an open space, and that development that would compromise this should not be supported in the Plan.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<ul style="list-style-type: none"> • Present an initial proposal as a basis for further discussion with the local authority, and • Address the planning telling in favour of allocating parts of the site for residential development. <p>Although it is noted that, beyond a small piece of land in the Harrow School estate, the local authority is not proposing changes to MOL/Green Belt, it is requested that this site be considered further through the emerging policy process, given the planning benefits that would accrue from allocating parts of the site for residential development, and the resulting improvements to community access to sporting facilities in the area.</p>	

Old Lyonians Sports Ground

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Bell Cornwall obo Old Lyonians	Additional information supporting a proposed residential development on the site.	<p>The Council considers that the site has considerable value as an open space, and that development that would compromise this should not be supported in the Plan.</p> <p>No proposed modifications</p>

Other Issues

Kenton West CPZ Consultation

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Aquil Sayers	I do not want this cpz to be initiated.	<p>None, this issue is outside the scope of the Plan.</p> <p>No proposed modifications</p>
Sudesh Kothari	it should be limited to parking of vans, lorries, anything not considered as commuter car.	<p>None, this issue is outside the scope of the Plan.</p> <p>No proposed modifications</p>
Harji Gorasia	Would like to object	<p>None, this issue is outside the scope of the Plan.</p> <p>No proposed modifications</p>
Vinesh Mistry	I'm all for the parking permits but I do not understand why its factoring in the CO2/engine capacity of the car, its disapointing that this is being considered. It should be a flat fee regardless of age/engine/emissions. I can understand a different prcing for commercial vechiles. Another money grabbing opertunity by the council.	<p>None, this issue is outside the scope of the Plan.</p> <p>No proposed modifications</p>
Chetan Patel	Would like to object	<p>None, this issue is outside the scope of the Plan.</p> <p>No proposed modifications</p>
Basil Rodrigues	Parking for visitors will be restricted. This will make it more difficult for retired people to have friends and relatives visit leading to loneliness. Will you be providing free parking permits?	<p>None, this issue is outside the scope of the Plan.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		No proposed modifications
Laxmi Patel	I do not want this implemented on my road.	None, this issue is outside the scope of the Plan. No proposed modifications
Lakhman Patel	<p>We are replying to Kenton East parking consultation.</p> <p>WE OBJECT TO THE INTRODUCTION OF THE NEW PARKING ZONES. WE HAVE NEVER HAD ANY ISSUES WITH PARKING ON OUR ROAD OR ANY ADJESENT ROADS.</p> <p>THE PARKING ZONES FOR KENTON EAST IS NOT VISIBLE ABOVE.</p> <p>JUST TO CONFIRM THIS FOR KENTON EAST WHICH IS NOT VISIBLE ABOVE.</p>	None, this issue is outside the scope of the Plan. No proposed modifications
Jashu Vekaria	The parking restrictions is sufficient as commuters can't park around here. It would only get congested if commuters are able to park	None, this issue is outside the scope of the Plan. No proposed modifications
Denise Finta	I do not agree with having a KW parking zone of Mon-Friday 10-3pm	None, this issue is outside the scope of the Plan. No proposed modifications
Lakhman Patel	We do not agree with the introduction of the new parking zone, we have never had an issue with parking on our road or any of the other adjesent roads	None, this issue is outside the scope of the Plan. No proposed modifications
Alex Tarverdi	<p>I believe that the proposed extension and change in parking (permit M review and M3 extension) has not considered the fact that customers to the northolt shops use the parking currently and if the proposal went ahead it would take away that ability to visit the shops. Northolt toad parking is already not enough and causes caos.</p> <p>The M3 extension is particularly a bad idea as it will reduce the number of parking spaces available on those roads and this will cause the residents great stress.</p> <p>Absolutely no need to include Saturdays.</p> <p>Overall feeling is that this extension of times and area is NOT needed and just a council money making idea.</p>	None, this issue is outside the scope of the Plan. No proposed modifications
Lee Monty	<p>KENTON EAST PARKING CONSULTATION</p> <hr/> <p>I am not happy with the way this Parking proposal is presented.</p> <p>Ruskin Gardens is a narrow road and parking is a problem at times during the day and at nighttime on certain days.</p> <p>I am in the process of having my house forecourt/garden re-paved in line with Harrow Council's requirements for a Vehicle Crossing and a Dropped Kerb. My Application for a Dropped Kerb was submitted in September 2024 and a positive response was received on 6 November with confirmation of the building requirements including that of water drainage. The only hold up with the implementation of this work has been trying to find Paving / Building company whose work is of a suitable standard that is approved by Harrow Council.</p> <p>When this work has been completed it will greatly relieve my own parking problems.</p> <p>However, the timescale for this consultation has been too short for me to develop an alternative strategy to present in this consultation, while at the same time trying to progress my own Vehicle Crossing and corresponding with Council staff and Council representatives.</p>	None, this issue is outside the scope of the Plan. No proposed modifications
Darren Johnson	We do not require a controlled parking zone.	None, this issue is outside the scope of the Plan. No proposed modifications

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Minesh Pindoria	<p>The proposed Kenton East parking restrictions issues noted in the letter are all irrelevant.</p> <p>We do not have issues with displaced non-residential parking from near by CPZ</p> <p>We and all our guest are able to park cars near our home. In fact if parking restrictions are added then this will make it worse.</p> <p>Not sure how dangerous speeding relates to parking restrictions??</p> <p>There is no high demand for parking our our road.</p>	<p>None, this issue is outside the scope of the Plan.</p> <p>No proposed modifications</p>

Evidence Base Comments

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Environment Agency	<p>Strategic Flood Risk Assessment (SFRA) – Level 1</p> <p>We note that updates to the Level 1 West London SFRA have been made to support the local plan and update the 3b classifications according to new guidance - we believe this is currently sufficient. However, as communicated further changes will need to be made to bring the West London SFRA up to date.</p> <p>In line with paragraph 166 of the NPPF, strategic policies should be informed by an SFRA. This is to ensure that the relevant policies are sound and backed with up-to-date evidence base. We note that SFRA's are classed as living documents and need to be reviewed and updated to reflect any major changes to flood risk or relevant data, amongst other things. More details available here.</p> <p>We are aware that the West London SFRA is currently being updated with respect to at least one of the relevant local planning authorities and note that this could be used as an opportunity to ensure that it is up-to-date and fit for purpose.</p>	<p>Noted. The West London SFRA (Level 1) is an online resource that has been updated on a regular basis since it was first completed; this is arguably more of a 'living document' than other SFRA's.</p> <p>No proposed modifications</p>
Environment Agency	<p>Strategic Flood Risk Assessment (SFRA) – Level 2</p> <p>We are pleased to see an updated Level 2 SFRA submitted as part of this consultation. It identifies general mitigation requirements for site allocations which we are happy with, and suggest you make sure all new developments follow this.</p>	<p>Noted; site allocations refer to the Level 2 SFRA where appropriate.</p> <p>No proposed modifications</p>
Environment Agency	<p>Harrow Surface Water Management Plan</p> <p>We note that the Harrow Surface Water Management Plan was produced in 2011. We recommend that Harrow Borough Council commission a new study. A new study would highlight opportunities to reduce the volume of contaminated urban run-off entering watercourses, to minimise the volumes of surface water entering the sewer network, and to increase the possibility of rainwater reuse. This can greater inform the policies and supporting text for Policies CN3, CN4, and CN5.</p> <p>More information on surface water management plans can be found here: https://www.gov.uk/government/publications/surface-water-management-plan-technical-guidance</p>	<p>Noted; this however is not considered to impact upon the soundness of the draft Local Plan.</p> <p>No proposed modifications</p>
Environment Agency	<p>Water cycle study</p> <p>Water cycle studies are a recommended approach for understanding not only the pressures an area puts onto the sewage network but also the demands that it places upon the water supply. Water cycle studies can also highlight opportunities for interventions that may alleviate either or both stresses (for example, what kind of SuDS may be appropriate in which location). As above, a water cycle study can greater inform the policies and supporting text for Policies CN3, CN4, and CN5. More information on water cycle studies can be found here: https://www.gov.uk/guidance/water-cycle-studies</p>	<p>Noted. Noted; this however is not considered to impact upon the soundness of the draft Local Plan.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Historic England (Tall Buildings Study)	<p>We welcome the consideration of heritage in line with guidance but are concerned by its limitation to the ‘built environment’. The historic and natural environment are intrinsic to one another and considering only ‘built heritage’ means that the assessment does not take account of registered parks and gardens (RPGs) or scheduled monuments (or their non-designated equivalents), both of which may be sensitive to tall buildings. This is particularly concerning, given the proximity of the scheduled Headstone Manor Site and the grade II Harrow Park. Fortunately, on this occasion, both assets intersect with built heritage assets – listed buildings and a conservation area respectively – meaning that the sensitivity of the area has been captured, albeit not to its full extent. However, this will not always be the case, and, in future, the methodology should be updated to include consideration of all designated and locally listed heritage assets as per the NPPF definition.</p>	<p>Noted.</p> <p>No proposed modifications</p>
Historic England (Tall Buildings Study)	<p>It is repeated throughout the report that protected views ‘<i>will have an impact on development</i>’. The opposite is true. We therefore suggest that this is rephrased to clarify that protected views are a consideration to which development should respond appropriately, seeking to avoid and mitigate any harm.</p> <p>We would also highlight that the London Plan Characterisation and Growth Strategy (2023) includes guidance for determining where tall buildings may be appropriate (Section 4.4). This guidance states that elements of character such as conservation areas and protected views are sensitive to tall buildings and should be discounted. We therefore seek clarification on why the protected views in the opportunity area are included with the tall building zone, particularly in Harrow on the Hill, where many of the views intersect, creating a more sensitive area.</p>	<p>Noted. The context of these statements relates to the purpose of the study, namely identifying where development / tall buildings may be appropriate in the borough and the scale of this, having regard to a range of considerations, including the impact of heritage assets on such opportunities (such assets having already being identified / fixed).</p> <p>No proposed modifications</p>
Historic England (Tall Buildings Study)	<p>We welcome the inclusion of conservation areas, listed buildings and locally listed buildings in the sensitivity criteria. However, as per HE46 we would highlight that it is inappropriate to only consider built heritage assets; all heritage assets should be considered (as per the London Plan Guidance Table 4.1). We would also highlight that Heritage at Risk is not a separate category of heritage asset, but a list of designated heritage assets (listed buildings, conservation areas, RPGs, etc) that are at risk. What is important to this study is the reasons <i>why</i> an asset is at risk, as it may be due to harm from inappropriate tall buildings (as is often the case for conservation areas and RPGs).</p> <p>We advise that in the future the same sized buffers are used for all designated heritage assets. This is because the buffers are arbitrary and do not represent the setting of an asset, which is significance, not distance, based. Therefore, assets of equal importance (e.g. national) should have equal (arbitrary) buffers (see also HE51 below). (Please note that this comment is also applicable to the section 10.4 of the Harrow Characterisation and Tall Buildings Study).</p>	<p>Noted, although considered unlikely to materially impact upon the overarching conclusions of the study and the implementation of any policy which it informs, where such considerations will be able to be considered on a site / proposal specific basis.</p> <p>No proposed modifications</p>
Historic England (Tall Buildings Study)	<p>This section states that: ‘<i>Site-specific analysis will be required to determine the potential impact of new tall building proposals on such heritage assets, in the form of a Townscape and Visual Impact Assessment and/or Landscape and Visual Impact Assessment.</i>’ This requires amending. Landscape and Visual Impact Assessment is a tool used to identify and assess the significance of and the effects of change resulting from development on both the landscape as an environmental resource and on people’s views and visual amenity. Whilst the value of heritage to both is a consideration, neither considers heritage significance as required by the NPPF. Only a heritage impact assessment (HIA) does that; it should therefore be made clear that a separate HIA is needed.</p>	<p>Noted, although considered unlikely to materially impact upon the overarching conclusions of the study and the implementation of any policy which it informs, where such considerations will be able to be considered on a site / proposal specific basis.</p> <p>No proposed modifications</p>
Historic England (Tall Buildings Study)	<p>This section discusses the buffers applied to conservation areas and states: ‘<i>This buffer does not represent or define what constitutes the maximum extent of ‘setting’ but seeks to take into account immediate setting in this strategic, borough-wide assessment.</i>’ We advise that this is amended. The setting of heritage assets is not simply its surroundings, it is those surroundings (and experiential qualities) which contribute to its significance. As such, the buffer cannot be said to take into account their ‘<i>immediate setting</i>’ and is arbitrary. It should be made clear that the consideration of heritage assets is limited to constraints mapping and does not take account of their significance as required by policy, a separate HIA would be needed to do that as per</p>	<p>Noted, although considered unlikely to materially impact upon the overarching conclusions of the study and the implementation of any policy which it informs, where such considerations will be able to be considered on a site / proposal specific basis.</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	the London Plan Characterisation and Growth Strategy (2023) para. 4.4.10 , which states that: <i>‘Having discounted areas of the borough where tall buildings are inappropriate for development, boroughs should assess the remaining areas (see top map in Figure 4.11) to identify where tall buildings would be detrimental; and, where relevant, to undertake an area-specific, heritage-led assessment of significance. Boroughs should determine the harm of tall buildings within these areas; and only identify areas where tall buildings could contribute positively to the character of an area. Where harm is identified, it should be documented as part of the borough’s evidence base and included, or linked to, in the local plan. Information on harm will be important for development management decision-making if tall buildings are proposed in these areas.’</i>	No proposed modifications
Historic England (Tall Buildings Study)	This section states: <i>‘Heritage Land is defined as open land of historic value, including sites listed on the on the Register of Historic Parks and Gardens of special historic interest in England.’</i> We query the reference to ‘Heritage Land’ and advise that is removed as it is not a mainstream heritage term and heritage significance comprises more than just historical value. It also has no relation to heritage at risk, which covers all types of designated heritage assets not just RPGs. However, we do welcome the ensuing point regarding the sensitivity of RPGs, which supports the point made in HE47.	Noted, although considered unlikely to materially impact upon the overarching conclusions of the study and the implementation of any policy which it informs, where such considerations will be able to be considered on a site / proposal specific basis. No proposed modifications

Consultation Comments

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
Standard Response 1	<p>Responses from Draft Local Plan Regulation 18 Consultation</p> <p>The Council has completely ignored the concerns of residents within the Opportunity Area. Changes to the Plan have only been made following feedback from residents outside of this area who are unaffected by these proposals and therefore have different motives for their opinions. Additionally, developers and other non-residential organisations seem to have unduly influenced the provisions of the Plan</p> <p>Targets for the Opportunity area have been increased from 7500 to 8750 since Regulation 18 Consultation, despite affected residents saying even the 7500 was too much, with adequate arguments to support this view.</p> <p>This raises very serious questions about the Council's assertion of 'Putting Residents First.' Clearly this has not been the case. To the contrary, the proposed Plan seems to satisfy all the demands of influential profiteering developers. We need to know why the Council has taken this path, to the detriment of the residents who elected them.</p> <p>Please make the purpose of this ‘Consultation’ clear. Is it to consult, which implies taking opinions into consideration, or is it merely to inform? Will this Plan simply be imposed upon us irrespective of any valid objections?</p>	<p>Consultation was carried out in line with relevant national regulations and the Council’s Statement of Community Involvement. Representations will form part of the material submitted for examination and have been responded to (this statement) in the context of the tests of soundness and the need for the draft Local Plan to be in general conformity with the London Plan.</p> <p>No proposed modifications</p>
Leslie Coombes	The council has overlooked the concerns of residents within the Opportunity Area. Changes to the plan have only been made following feedback from residents outside of this area. Additionally, developers and other non-residential organisations have been able to comment.	Consultation was carried out in line with relevant national regulations and the Council’s Statement of Community Involvement. Representations will form part of the material submitted for examination and have been responded to (this statement) in the context of the tests of soundness and the need for the draft Local Plan to be in general conformity with the London Plan.

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
		No proposed modifications
Standard Response 1	<p>Regulation 19 Consultation</p> <p>Given the complexity and length of the Plan document, and it's far reaching consequences, the consultation seems rushed.</p> <p>Residents were reportedly allotted six weeks to respond, from the 4th of November to the 17th of December. However, those who have previously responded were only notified on the 17th of November, effectively reducing the actual consultation period to four weeks.</p>	<p>The consultation has been carried out in line with national regulations and the Council's Statement of Community Involvement.</p> <p>No proposed modifications</p>
Standard Response 1	<p>The MS Forms survey provided for making representations does not permit users to save their progress and return later to continue from where they left off. Completing it thoroughly, with considered responses and multiple answers, requires more than one session. The Plan document is voluminous and difficult to grasp for most lay people with its extent of detail and technical content. So why is there no facility in the programme to save and continue later? Also, there seems to be a space limit for the comment. In one section, namely Strategic Policy 06, I was unable to fit in my complete comment.</p> <p>I am copying the missing part of that response here:</p> <p>.....infrastructure demands of its current residents. It actually makes no logical sense, and lays ground for future problems</p> <p>The New Harrow Local Plan - Infrastructure Delivery Plan generally indicates that funding for projects has not been sourced. Refer to the table: Harrow New Local Plan 2021-2041 - Infrastructure Delivery Plan (IDP) - Appendix 1 Infrastructure Schedule (as of 28 October 2024). This implies that the issue of infrastructure remains unresolved.</p> <p>Residents have been demanding adequate infrastructure to meet present and future needs, but this seems to be falling upon deaf ears.</p>	<p>Consultation was carried out in line with relevant national regulations and the Council's Statement of Community Involvement. Multiple means of making representations were provided.</p> <p>No proposed modifications</p>
Chandarakar Shah	<p>We have been resident in this area since 1988 and have seen major decline in the area.</p> <p>The various developments are also taking place at the same time, with no thought to the impact on residents. It has not been staggered over a long period to allow residents to adjust. We are very unhappy that this area is being picked on for unfair overdevelopment, which has led over unbearable living conditions</p> <p>The form is not user friendly and the policies are difficult to understand. It has taken a considerable amount of time and effort to fill in this form. Please can you make the consultation easier to engage in?</p>	<p>Consultation was carried out in line with relevant national regulations and the Council's Statement of Community Involvement. Multiple means of making representations were provided.</p> <p>No proposed modifications</p>
Nirmala Shah	<p>The consultation has been poor and exclusionary.</p> <p>It takes a long time to read the jargon filled documents. How are ordinary residents supposed to engage?</p> <p>The form is also very difficult to fill in. There are over 60 policies to choose from, many of the interrelated. Is there no way to response to many at a time?</p>	<p>Consultation was carried out in line with relevant national regulations and the Council's Statement of Community Involvement. Multiple means of making representations were provided.</p> <p>No proposed modifications</p>
Pat Beazley	<ul style="list-style-type: none"> • Letters not sent out to residents, instead, the council made announcements on Facebook and the online newsletter. This excludes those that do not have online access. The council should surely write to every household in Harrow. • Accessibility needs not met. Sign language experts and interpreters were not provided at the face-to-face consultations. No provision for those who do not speak English. 6% of the borough have no or poor English. • Documents are not easy to read and too long with many contradictions and inconsistencies. Too many supporting documents. Maps are not labelled, making it difficult to understand the areas identified. The colour pallets used on maps are not useful. Have these been tested for those with colour blindness? • Presentation materials at the face-to-face consultation did not provide sufficient information. They relied on residents being able to ask pertinent questions rather than being given the sufficient information. 	<p>Consultation was carried out in line with relevant national regulations and the Council's Statement of Community Involvement.</p> <p>No proposed modifications</p>

Who Responded	Summary of main issue raised	Council response & modification(s) proposed
	<ul style="list-style-type: none"> The online survey is superficial and does not give enough information to allow respondents to answer questions sufficiently. The council has not offered or considered any other options for development. Has any modelling of other options happened, if so why haven't residents been asked to select from those options. The previous consultation had four options to choose from. Option-High Road and Town Centres were chosen. The continuity from the previous plan is not referred to in the new plan. There is no reference to the success or failure of the previous plan. What has been the impact of all the developments to date? What capacity has already been used up? What is the remaining capacity? 	

No Comments Made

Natural England responded, but had no policy comments. Active Travel England responded to state that their statutory consultee role does not extend to plan-making at the current time.

22(c)(vi) Policies upon which no representation were made in regulation 20

None.