

LB Harrow New Local Plan – Proposed Submission (Regulation 19) version

bdp Consulting
 124 City Road
 London
 EC1V 2HX

Representations on behalf of BDP Consulting

Rep	Policy	Comment	Status
1	GR1	<p>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.</p> <p>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.</p>	Object
2		<p>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.</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>	Object
3		<p>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.</p>	Object

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		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.	
4		<p>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.</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>	Object
5		<p>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.</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>	Object
6		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.	Object

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		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.	
7	Policy GR2	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.	Object
8		<p>In any events the definition chosen by the LPA for inclusive neighbourhood is vague, lacks precision and is not capable of analysis or demonstratable analytical definition. Policy GR2A cannot therefore be complied with because it deals with a concept that is fundamentally too 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>	Object
9		<p>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”.</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>	Object

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Rep	Policy	Comment	Status
10		<p>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.</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>	Object
11		<p>Part D should also be deleted because these matters will be dealt with else in the local plan and detailed heritage policies to follow.</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>	Object
12	Policy GR3	<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.</p> <p>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.</p>	Object

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Rep	Policy	Comment	Status
		<p>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.</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>	
13		<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>	Object
14	Policy GR3B	<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.</p> <p>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 policies elsewhere in the plan and adds unnecessary repetition and complexity which will make using the local plan less efficient than it should 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>	Object

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Rep	Policy	Comment	Status
15	Policy GR3AB	<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.</p> <p>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>	Object

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Rep	Policy	Comment	Status
16	Policy GR4 Building Heights	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.	Object
17	Policy GR4A	<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>	Object
		<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>	Object

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18	Policy GR5 View Management	<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.</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>	Object
19		<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.</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>	Object
20		<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>	Object

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Rep	Policy	Comment	Status
21		<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>	Object
22	Policy GR6 Areas of Special Character	<p>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.</p> <p>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.</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>	Object
23		<p>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.</p>	Object

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		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.	
24		<p>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.</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>	Object
25	Policy GR7 External Lighting	<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>	Object
26		That is an error in policy GR7 as there are two part A's.	Object

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		<p>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>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>	
27	Policy GR8 Shopfronts and Forecourts	<p>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.</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>	Object
28	Policy GR9 Outdoor Advertisements, Digital Displays and Hoardings	<p>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.</p>	Object

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		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.	
29		<p>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.</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>	Object
30	Policy GR 11 Planning Obligations	<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>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>	Object

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31	Policy GR 12 Site Allocations	<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-allocated sites which h 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 compulsory 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>	Object
32		<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</p>	Object

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		<p>impacts on cost and liability as part of their decision whether to compulsory 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>	
33		<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>	Object
34		<p>Policy CE is also unreasonable. It may be that there are no proposals on a site allocation or proposals to compulsory 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 site which can be brought to the market quicker.</p>	Object

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		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.	
35	Strategic Policy 02 Harrow's Historic Environment	In policy 02A only subsection eight 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.	Object
36		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.	Object
37		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.	Object
38		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.	Object

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39	Policy HE 1 Historic Environment	<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>	Object
40		<p>Policy B should also be deleted as it does not affect national policy. Any assessment should be proportionate and this qualification 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>	Object
41		<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>	Object
42		<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. This position does not warrant a planning policy to state what the council must do in any event.</p>	Object

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		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.	
43		<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>	Object
44		<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>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>	Object
45	Policy HE2 Enabling Development	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.	Object

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		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.	
46	Strategic Policy 03	<p>The earliest this local plan will come into effect is 2025 and therefore the policy targets should be changed to reflect this.</p> <p>The housing target should run from 2025 not 2019 as this will facilitate six years of under-performance in housing delivery that the LPA seeks to offset against the new housing total, building in under performance into the housing targets. This will guarantee that housing targets are not met, site potential not optimised and delivery of housing not maximised within the borough and the housing crisis that exist in London and also within Harrow not effectively met or addressed.</p> <p>The size criteria of 0.25 ha should be deleted for windfall sites. Many windfall sites will come from sites which have an area much smaller than this and they should not be excluded by any possible mis -application or mis-interpretation of this policy. The additional qualifications dealing with character of the area, infrastructure, and compliance with other policies of development plan should be deleted as they simply repeat other local policies other policies elsewhere within the plan.</p> <p>Part 4 should be deleted as it simply repeats other policies that will be applicable and which appear elsewhere in the local plan. In addition excluding housing that falls within areas having a PTAL of 1 and 2 is also a missed opportunity. In a housing crisis all available housing sites should be considered and within Harrow there are plenty of areas of suburban housing which have similar PTAL values which are used for housing. This existing housing is able to make a positive contribution to the stock of housing within the borough and so housing should not be precluded from coming forward in similar areas.</p>	Object

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Rep	Policy	Comment	Status
		<p>Suburban areas do not have a unique character and to set a design standard which is on the face of it higher than that for conservation areas or buildings is unreasonably restrictive . This reference should be deleted.</p> <p>Specialist older people housing given the proportion of aging and elderly people in the population and the significant medical and health needs that they attract, the minimum of 980 units to be provided over the plan period is likely to be a significant underestimate. It is certain that the actual hidden need is likely to be much larger than the LPA has identified.</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>	
47	Policy HO1 Dwelling Size and Mix.	<p>This policy is 3 1/2 pages long and is far too long and complex to contain the information it does in a single policy. It should either be deleted or split up between different policy topics.</p> <p>Having six criteria to determine dwelling size and mix is excessive given that the policy already states that dwelling mix will be determined on a side-by-side basis.</p> <p>Policy C deals with two bed two person units and it is inconsistent with this policy to impose an artificial threshold of two bed four person units. Requiring larger units than sites that can withstand or bring forward will restrict unit the flexibility sites to provide housing and conflict with the previous policy position that housing is to be determined on a side-by-side, case by case basis.</p> <p>C is unnecessary and repeats with greater complexity the provision set out above. There is no need for the duplication and complexity and policy C should be deleted.</p>	Object

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		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.	
48	HO2 Conversion and Redevelopment of Dwellings	<p>Restricting conversions to areas with PTAL ratings of 3 to 6 will artificially constrain the areas where new housing can come forward. In a housing crisis where there is the need to maximise housing provision to reduce pressure in the greenbelt and other policy objectives it is sub optimal to artificially restrict the locations where housing house development can come forward, particularly where there is existing housing in these locations.</p> <p>The criteria set out in this part of policy repeat criteria that are set out with the local plan. This creates complexity and duplicates already except policies to no purpose. This policy contains 12 criteria which is excessive. This policy should be deleted.</p> <p>Part 3 this policy does not add anything to the local plan. It states that where policies are compliant with it they will be allowed which is by definition the purpose of which is the definition of all acceptable schemes. This policy should be deleted as it adds unnecessary complexity which makes the plan ineffective.</p> <p>Part 4 this policy does not have anything to the local plan. It states where policies are not complied with schemes will be refused. This adds nothing to the local plan except complexity and makes it harder to use less effective.</p> <p>Part 5 The development Scenario set out in policy 5D is already covered by earlier policies and is confusingly and unnecessarily repeated here. It should be deleted as the complexity ads makes the plan in effective</p>	Object

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		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.	
49	Policy HO3 Optimising the Use of Small Housing Sites	<p>Part 1 excluding sites which lie outside areas with a PL of 3 to 6 will artificially constrain the amount of housing that can come forward. This policy should be deleted.</p> <p>Policy 2 seeks to micromanage the provision of housing in a way that is likely to prevent housing coming forward in the numbers needed by the Borough. Such sites can only bring about incremental change and it is unreasonable to micromanage such small levels of change. The policy should be deleted as it will be ineffective and result in less housing coming forward than otherwise would meet housing need.</p> <p>Part 3 The five criteria set out in this policy our owners and will prevent small sites coming forward. This will be an effective as it will frustrate the LPA meeting its housing need and this policy therefore will be ineffective. It should be deleted.</p> <p>Part 4 conflicts with optimisation of sites without defining what optimisation means or setting criteria for it. This policy will therefore be ineffective because it contains no benchmark to assess optimisation against and therefore it will not produce effective planning decisions. It should be deleted.</p> <p>Part 5 recognises that there will be circumstances where the LPA is not meeting it housing delivery target. If this is the case it is likely to be due to a local plan that is over complex and contains too many policies with too many criteria. This policy does not set out the contingency measures which may be undertaken and therefore this policy is ineffective.</p>	Object

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		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.	
50	HO4 Genuinely Affordable Housing	<p>While Affordable Housing is a concept which does not appear in the London plan, the NPPF and the NPPG, genuinely affordable housing is a different concept which is undefined. It should be renamed to be consistent with planning terms and definitions use elsewhere. In addition, the term genuinely affordable housing does not appear elsewhere in the policy.</p> <p>The policy is 3 1/2 pages long and is overly complex and deals with too many issues to be effective. It contains matters that the best dealt with in SPD's or supporting text and the policy should be radically restructured to avoid confusion. In any vent the policy says nothing that is not already in the London Plan and there is no need to duplicate that policy here.</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>	Object
50A	Policy H05 Housing Estate Renewal and Regeneration	<p>There is no need for this policy. The only applicants likely in this scenario is the LPA itself as the owner of public housing estates and they are able to undertake the liaison and community consultation process using their own policies elsewhere without having to clog up the local plan with them.</p> <p>The estates that are likely to be candidates for renewal should be identified in site allocations and all of the detail of this policy can be included in the appropriate site allocation. This policy is irrelevant to the vast majority of planning applications that will be made during the plan period and therefore it does not warrant or require a separate policy itself. It is not effective and therefore should be deleted.</p>	Object

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Rep	Policy	Comment	Status
		<p>This policy contains 4 parts and 31 different criteria and is two pages long. It is excessively detailed and will not result in effective planning because it is too prescriptive. The complexity created will be a bar on sites coming forward and its length is such that it will not result in effective planning decisions 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. The policy therefore should be re drafted to reflect this point or deleted.</p>	
51	Policy HO7 Supported and Sheltered Housing	<p>This policy is too vague to be able to be effective and accurately guide new development proposals coming forward. It must address a local need without identifying how that local need is to be calculated and regard must be had to any best practice standards the LPA considers relevant. This is so vague that if it were a planning condition it would fail the relevant planning tests and could not be applied to a planning permission. There is no justification for allowing such a loosely worded coming policy to be adopted in an emerging local plan.</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>	Object
52	Policy HO8 Purpose-Built Student Accommodation	<p>It is unnecessarily restrictive in giving priority to sites which are located in proximity to the education facility it may serve. The market for educational institutions in London is London wide as is the market for student accommodation. It is likely that institutions from outside Harrow will be the end destination of occupiers and therefore it will be necessary for proposal to be flexible and adapt themselves to the needs of those institutions and students.</p> <p>If Harrow does not accommodate world class tertiary education facilities like other parts of London, then it should not exclude itself from that market by preventing students from those institutions from the</p>	Object

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		<p>opportunity to live within the Borough. This is unreasonable and will act as a break on development and prevent schemes coming forward. It will therefore be an ineffective 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>	
53	Policy HO9 Large Scale Purpose-Built and Conversion for Shared Living.	<p>This scheme contains two parts and criteria which seek to impose two types of control on emerging schemes. These additional criteria do not reflect those of the London Plan and so is not supported by it. This represents an inconsistency between regional and local development plan policies which is unreasonable and will result in ineffective planning for this sector. This policy should be deleted exception so far as it refers to London Plan policy H 16.</p> <p>This policy complies prices 14 parts with 10 sub parts which makes it extremely complex and inefficient to use. It is also repetitive and it's re-states topics and matters that have been dealt with elsewhere in the emerging plan to better effect. The complexity of the policy will prevent it from being effective and in promoting schemes via the development plan.</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>	Object
54	Policy HO 11 Self Build and Custom Build Housing.	<p>This policy is ineffective and likely to act as a break and check on this form of housing coming forward. It is overly restrictive requiring applicants to demonstrate compliance with unnecessary criteria and to demonstrate need. The purpose of the policy should be to carve out a ring fence where such housing can come forward and this policy does not achieve that. It provides a series of hurdles and barriers to local</p>	Object

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		<p>custom and community self-build and use and repeats other policies in the plan to achieve this. This is an unnecessarily restrictive and onerous policy that will prevent this form of housing coming forward which is contrary to national policy guidance 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>	
55	Strategic Policy 05 Harrow and Wealdstone Opportunity Area	<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>	Object
56		Policy C should be deleted as it is meaning is unclear	Object

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		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.	
57		<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>	Object
58	Policy LE 1 Development Principles and Town Centre Hierarchy	<p>Part 8 does not reflect the NPPF or NPPG in its policy objective of directing town Centre uses to town centres. 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. The policy therefore should be re drafted to reflect this point or deleted.</p>	Object
59		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.	Object

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		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.	
60		<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>	Object
61		<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>	Object
62		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	Object

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		<p>sequential test. This is unreasonable and conflicts with national policy creating uncertainty for applicants in promoting schemes, and land owners.</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>	
63		<p>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.</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>	Object
64		<p>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.</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>	Object

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65	Policy LE2 Night Time and Evening Economy	<p>The policy does not deal with the case of existing lawful and evening economy uses which lie outside Metropolitan town centres and other centres.</p> <p>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.</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>	Object
66	Policy LE3 Industrial Land	<p>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.</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>	Object
67		<p>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</p>	Object

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Rep	Policy	Comment	Status
		<p>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.</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>	
68		<p>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.</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>	Object
69		<p>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.</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>	Object
70		<p>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</p>	Object

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		<p>from coming forward and put operators off making applications or occupying property and creating jobs within the borough.</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>	
71		<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>	Object
72		<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>	Object

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Rep	Policy	Comment	Status
73		<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>	Object
74	Policy LE 4 Culture and Creative Industries	<p>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.</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>	Object
75		<p>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.</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>	Object
76		<p>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.</p>	Object

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		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.	
77		<p>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.</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>	Object
78	Policy LE5 Tourism and Visitor Accommodation	<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>	Object
79		<p>Policy C is unnecessarily repetitive and pointless. It 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>	Object

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Rep	Policy	Comment	Status
80		<p>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.</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>	Object
81	Strategic Policy 06 Social and Community Infrastructure	<p>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.</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>	Object
82		<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>	Object

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Rep	Policy	Comment	Status
83		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.	Object
84		<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>	Object
85		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.	Object
86		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.	Object

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Rep	Policy	Comment	Status
		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.	
87	Policy CI 1 Safeguarding and Securing Social Infrastructure	<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>	Object
88		<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>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>	Object
89		<p>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.</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>	Object

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Rep	Policy	Comment	Status
90		<p>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.</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>	Object
91		<p>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.</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>	Object

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Rep	Policy	Comment	Status
92		<p>Policy C logically this policy should appear before new social infrastructure</p> <p>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.</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>	Object
93		<p>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.</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>	Object
94		Policy CC and policy CD duplicate each other.	Object

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		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.	
95		<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>	Object
96	Policy CI 2 Play and Informal Leisure	<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>	Object

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Rep	Policy	Comment	Status
97	CI 3 Sport and Recreation	<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>	Object
98		<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 and cannot be adopted. The policy therefore should be re drafted to reflect this point or deleted.</p>	Object
98A		<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>	Object

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Rep	Policy	Comment	Status
		The policy is too loosely drawn to be effective and therefore should be re drafted to reflect this point or deleted.	
98B		<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>	Object
99	C I 4 Digital and Communications Infrastructure	<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>	Object
100		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	Object

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		<p>no further justification available to them and 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.</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>	
101	Strategic Policy 07	<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>	Object
102		<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>	Object
103		<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.</p>	Object

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Rep	Policy	Comment	Status
		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.	
104		<p>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>	Object
105		<p>Policy E already conflicts with policy D because by definition small scale and features will result in the net loss of green 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>	Object
106		<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>	Object

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Rep	Policy	Comment	Status
107		<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>	Object
108		<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>	Object
109		<p>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 .</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>	Object
110		<p>Policy J repeats policies that appear elsewhere in the plan. It adds unnecessary complexity and repetition.</p>	Object

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		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.	
111		<p>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</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>	Object
112		<p>Part L is an aspirational statement not a planning policy that repeats emerging policy G15. It adds unnecessary complexity and repetition.</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>	Object
113		<p>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.</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>	Object

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Rep	Policy	Comment	Status
114	Policy GI 1 Greenbelt and Metropolitan Open Land	<p>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.</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>	Object
115		<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>	Object
116		<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>	Object
117		<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</p>	Object

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Rep	Policy	Comment	Status
		<p>entirely subjective and will give no certainty to applicants or lands in bringing schemes and sites forward. The national Greenbelt policy is onerous enough without adding further local complications.</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>	
118		<p>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 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>	Object
119		<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>	Object
120		<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.</p>	Object

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Rep	Policy	Comment	Status
		<p>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>	
121	Policy GI 2 Open Space	<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.</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>	Object
122		<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 deal dealt with by CIL and not 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>	Object
123		<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>	Object

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Rep	Policy	Comment	Status
124	Policy GI 3 Biodiversity	<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>	Object
125	GI 4 Urban Greening Landscaping and Trees	<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>	Object
126	Policy GI 5 Food Growing	<p>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.</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>	Object
127		<p>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</p>	Object

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Rep	Policy	Comment	Status
		<p>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 out comes for meeting identified 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>	
128		<p>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.</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>	Object
129		<p>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.</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>	Object

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Rep	Policy	Comment	Status
130	Policy C	<p>This matter should dispose should be deleted in its entirety as these are all matters which are better dealt with post planning in the detail design stage, via the building regulations. These policies are too detailed and require too much information to be supplied as part of the initial application which adds cost and complexity to the planning process, which results in Delay as more information is has to be processed by the LPA.</p> <p>It is not clear that the LPA's climate and nature strategy is a Development Plan Documents that has been through the necessary development plan process to achieve Development Plan Status. It's not clear why this emerging development plan is being made subordinate to a document that does not have the benefit of the rigour of this process.</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>	Object
131	Policy CN 1 Sustainable Design and Retrofitting	<p>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.</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>	Object
132		<p>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.</p>	Object

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Rep	Policy	Comment	Status
		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.	
133	Policy CN 2 Energy Infrastructure	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. The policy is too loosely drawn to be effective and therefore should be re drafted to reflect this point or deleted.	Object
134		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.	Object
135	Policy CN3 Reducing Flood Risk	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.	Object

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Rep	Policy	Comment	Status
		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.	
136		<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 optical 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>	Object
137	Policy CE 1 Reducing and Managing Waste	<p>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.</p> <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>	Object

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138	Policy CE 1 Reducing and Managing Waste	<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>	Object
139	Policy CE 1 Reducing and Managing Waste	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.	Object
140		<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>	Object
141		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.	Object

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		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.	
142		<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>	Object
143	CM5 Waterway Management	<p>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.</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>	Object
144		<p>Part C contains two sub-part E's</p> <p>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</p>	Object

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		<p>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.</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>	
145		<p>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.</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>	Object
146		<p>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.</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>	Object

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147	Strategic Policy 09 Managing Waste and Supporting the Circular Economy	<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>	Object
148	Policy CE 1 Reducing and Managing Waste	<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>	Object
149	Policy CE 2 Design to Support the Circular Economy	<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>	Object

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		<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>	
150	Strategic Policy 10	<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. The Policy is therefore unlikely to be effective because of the 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.</p> <p>The policy therefore should be re drafted to reflect this point or deleted.</p>	Object
151		<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>	Object
152		<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>	Object

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		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.	
153		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 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.	Object
154		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.	Object
155	Policy M1 Sustainable Transport	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.	Object

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		<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>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 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.</p> <p>The policy therefore should be re drafted to reflect this point or deleted.</p>	Object
156		<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.</p> <p>The policy therefore should be re drafted to reflect this point or deleted.</p>	Object
157		<p>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.</p>	Object

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		<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>	
158		<p>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.</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>	Object
159	Policy M2 Parking	<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 not sound and cannot be adopted. The policy therefore should be re-drafted to reflect this point or deleted.</p>	Object
160		<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>	Object

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		<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>	
161	Policy M3 Deliveries Servicing and Construction	<p>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 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>	Object
162		<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>	Object

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163		<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. The doubt introduced into this policy will make it 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>	Object