

### View results

Respondent

4 Anonymous

31:34

Time to complete

### Part A - Personal Details

We will not be able to accept responses where personal details are not provided.

1. Are you submitting this representation as an individual or on behalf of an organisation? \*

- Individual
- Organisation

2. Title

Mr

3. First Name \*

Sean

4. Last Name \*

Tofts

5. Job Title (where relevant)

[REDACTED]

6. Organisation (where relevant)

Elite Planning



14. To which policy does your representation relate? \*

- Strategic Policy 01: High Quality Growth
- Policy GR1: Achieving a High Standard of Development
- Policy GR2: Inclusive Neighbourhoods
- Policy GR3: Public Realm and Connecting Places
- Policy GR3A: Inclusive Design (New)
- Policy GR3B: Safety, Security and Resilience to Hazards (New)
- Policy GR4: Building Heights
- Policy GR4A: Basement Development (New)
- Policy GR5: View Management
- Policy GR6: Areas of Special Character
- Policy GR7: External Lighting
- Policy GR8: Shopfronts & Forecourts
- Policy GR9: Outdoor Advertisements, digital displays and hoardings
- Policy GR10: Infill and backland sites, back gardens and amenity areas
- Policy GR11: Planning Obligations
- Policy GR12: Site Allocations (New)
- Strategic Policy 02: Harrow's Historic Environment
- Policy HE1: Historic Environment
- Policy HE2: Enabling Development
- Strategic Policy 03: Meeting Harrow's Housing Needs
- Policy HO1: Dwelling size mix
- Policy HO2: Conversion and redevelopment of dwellings
- Policy HO3: Optimising the use of small housing sites
- Policy HO4: Genuinely Affordable Housing
- Policy HO5: Housing estate renewal and regeneration
- Policy HO6: Accommodation for older people
- Policy HO7: Supported and Sheltered Housing
- Policy HO8: Purpose-built student accommodation
- Policy HO9: Large scale purpose built and conversions for shared living
- Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

- Policy HO11: Self-build and Custom build housing
- Policy HO12: Gypsy and Traveller Accommodation Needs
- Strategic Policy 04: Local Economy
- Strategic Policy 05: Harrow & Wealdstone Opportunity Area
- Policy LE1: Development Principles & Town Centre Hierarchy
- Policy LE2: Night-time and Evening Economy
- Policy LE3: Industrial Land
- Policy LE4: Culture and Creative Industries
- Policy LE5: Tourism and Visitor Accommodation
- Strategic Policy 06: Social and Community Infrastructure
- Policy CI1: Safeguarding and Securing Social Infrastructure
- Policy CI2: Play and Informal Leisure
- Policy CI3: Sport and Recreation
- Policy CI4: Digital and Communications Infrastructure
- Strategic Policy 07: Green Infrastructure
- Policy GI1: Green Belt and Metropolitan Open Land
- Policy GI2: Open Space
- Policy GI3: Biodiversity
- Policy GI4: Urban Greening, Landscaping and Trees
- Policy GI5: Food Growing
- Strategic Policy 08: Responding to the Climate and Nature Emergency
- Policy CN1: Sustainable Design and Retrofitting
- Policy CN2: Energy Infrastructure
- Policy CN3: Reducing Flood Risk
- Policy CN4: Sustainable Drainage
- Policy CN5: Waterway Management
- Strategic Policy 09: Managing Waster and Supporting the Circular Economy
- Policy CE1: Reducing and Managing Waste
- Policy CE2: Design to support the Circular Economy
- Strategic Policy 10: Movement
- Policy M1: Sustainable Transport

- Policy M2: Parking
- Policy M3: Deliveries, Servicing and Construction
- Other

15. Do you consider this policy sound?

- Yes
- No

16. Please give details of why you consider this policy to be sound or not sound and set out the modification(s) you consider necessary to make the policy sound that you have identified (if any).

The London Borough of Harrow's proposal to implement a 15% BNG target under Policy G14, in conjunction with the Urban Greening Factor (UGF) requirements of Policy G13, presents significant legal and practical challenges. This policy framework threatens the soundness of the Local Plan, undermines housing delivery, inflates housing costs, and may inadvertently promote urban sprawl; undermining the policy initial and primary goal. A return to the statutory 10% BNG target is essential to ensure the plan's legal compliance, viability, and alignment with national housing objectives.

Legal Compliance and Soundness

Inconsistency with National Policy

The National Planning Policy Framework (NPPF) mandates that local plans must be justified, effective, and consistent with national policy. The Environment Act 2021 sets a statutory minimum of 10% BNG, permitting higher targets only when supported by robust, proportionate evidence. Harrow's proposed 15% target lacks such justification, rendering it inconsistent with national policy and, therefore, unsound.

Inadequate Evidence Base

The National Planning Policy Guidance (NPPG) requires that any uplift in BNG targets be underpinned by clear evidence demonstrating local need and viability. Harrow's justification for the 15% target is based on general assertions of biodiversity deficits without detailed, site-specific data. This deficiency mirrors the shortcomings identified in the Uttlesford District Council Local Plan, where inspectors deemed the plan unsound due to insufficient evidence supporting key policies.

Duty to Cooperate

The Planning and Compulsory Purchase Act 2004 imposes a Duty to Cooperate on local authorities, necessitating effective engagement with neighbouring councils and statutory bodies on strategic matters. Harrow's reliance on off-site biodiversity credits intensifies the need for cross-boundary coordination. The Council has not demonstrated adequate collaboration to secure the necessary off-site habitat banks or biodiversity units, risking a breach of this duty. The Sevenoaks District Council's Local Plan serves as a pertinent example, where failure to meet the Duty to Cooperate led to the plan being found unsound.

Impact on Housing Delivery and Land Supply

Threat to Housing Targets

Harrow's Local Plan aims to deliver 16,040 homes by 2041, contributing to the national housing target of 370,000 new homes annually. The financial and practical burdens imposed by the combined requirements of Policies G13 and G14 jeopardise this objective. Increased development costs may deter investment, delay projects, and reduce overall housing output, undermining both local and national housing strategies.

Affordable Housing Provision

Policy H4 seeks to maximise affordable housing delivery. However, the cumulative costs associated with meeting UGF and BNG requirements are likely to compel developers to renegotiate Section 106 obligations, prioritising BNG compliance over affordable housing contributions. This trade-off directly undermines Harrow's ability to address pressing local housing needs and exacerbates affordability challenges.

Reduction in Developable Land

The stringent greening and biodiversity requirements may render certain sites financially unviable, effectively reducing the borough's developable land supply. This contraction in available land further impedes the Council's capacity to meet its housing targets and may lead to increased competition for remaining sites, driving up land prices and, consequently, housing costs.

Inflation of Housing Costs and Promotion of Urban Sprawl

Increased Development Costs

The financial obligations imposed by the 15% BNG target and UGF requirements will likely be passed on to consumers, resulting in higher housing prices. This escalation exacerbates the affordability crisis, making it increasingly difficult for residents to secure housing within the borough.

PART ONE (continued in the response to G14)

17. Would you like to make another representaion?

Yes

No

### Part B - Your Representation(s) (2)

To which part of the Local Plan does this representation relate?

18. To which policy does your representation relate? \*

- Strategic Policy 01: High Quality Growth
- Policy GR1: Achieving a High Standard of Development
- Policy GR2: Inclusive Neighbourhoods
- Policy GR3: Public Realm and Connecting Places
- Policy GR3A: Inclusive Design (New)
- Policy GR3B: Safety, Security and Resilience to Hazards (New)
- Policy GR4: Building Heights
- Policy GR4A: Basement Development (New)
- Policy GR5: View Management
- Policy GR6: Areas of Special Character
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- Policy HE1: Historic Environment
- Policy HE2: Enabling Development
- Strategic Policy 03: Meeting Harrow's Housing Needs
- Policy HO1: Dwelling size mix
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- Strategic Policy 04: Local Economy
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- Policy CE1: Reducing and Managing Waste
- Policy CE2: Design to support the Circular Economy
- Strategic Policy 10: Movement
- Policy M1: Sustainable Transport



- Policy M2: Parking
- Policy M3: Deliveries, Servicing and Construction
- Other

19. Do you consider this policy sound?

- Yes
- No

20. Please give details of why you consider this policy to be sound or not sound and set out the modification(s) you consider necessary to make the policy sound that you have identified (if any).

PART TWO of submission in relation to G13 and G14:

Increased Development Costs

The financial obligations imposed by the 15% BNG target and UGF requirements will likely be passed on to consumers, resulting in higher housing prices. This escalation exacerbates the affordability crisis, making it increasingly difficult for residents to secure housing within the borough.

Displacement and Urban Sprawl

As housing costs rise, residents may be forced to seek more affordable options outside London, leading to population displacement. This outward migration contributes to urban sprawl, with development extending into surrounding areas, increasing commuting distances, and placing additional strain on infrastructure and services in neighbouring regions.

Unsoundness of the Policy

Lack of Proportionate Evidence

The absence of a robust evidence base to justify the 15% BNG target renders the policy unjustified and, therefore, unsound under the NPPF. Without clear, proportionate evidence demonstrating the necessity and viability of the uplift, the policy cannot be considered justified.

Undermining Plan Deliverability

The cumulative financial and practical burdens introduced by Policies G13 and G14 threaten the deliverability of the Local Plan. By imposing excessive obligations on developers, the policies risk undermining housing delivery, affordable housing provision, and infrastructure contributions, contravening NPPF requirements for plan effectiveness.

Inconsistency with National Policy

The proposed 15% BNG target exceeds the statutory minimum without adequate justification, rendering it inconsistent with national policy as outlined in the Environment Act 2021 and the NPPF. This inconsistency further undermines the soundness of the Local Plan.

In conclusion the proposed 15% BNG policy, in conjunction with the UGF requirements, introduces excessive financial and practical burdens that threaten the soundness of Harrow's Local Plan. The policy lacks the necessary evidence base, undermines housing delivery and affordability, and may inadvertently promote urban sprawl. To ensure legal compliance, viability, and alignment with national housing objectives, the Council must revert to the statutory 10% BNG target. This adjustment will support biodiversity enhancement without compromising the plan's overarching development goals.

It could be suggested that there is a political element to the proposed policy to offer further rebuttal to the delivery of the homes so desperately needed and, hopefully inadvertently, pushing the least fortunate out of the borough.

21. Would you like to make another representaion?

- Yes
- No

## Part C - Demographics