



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

By email to: local.plan@harrow.gov.uk

13 December 2024

Dear Sir/Madam,

Local Plan Review Regulation 19 Consultation

CPRE London is a membership-based charity with 2500 members across London, concerned with the preservation and enhancement of London's vital green spaces, as well as the improvement of London's environment for the health and wellbeing of all Londoners.

Thank you for the opportunity to provide comments on this important consultation.

We support the Plan's green space policies including the commitment to ensure Harrow's Green Belt and Metropolitan Open Land remains protected. However, the Plan should be more ambitious about creating clear identities for green spaces across the borough, including new parks, nature recovery areas and wetlands for flood management, where appropriate. It also needs to reflect the importance of front and back gardens to nature and flood management objectives. Harrow should address amenity green space needs *per person* when assessing outdoor / green space given population densification in particular areas. We have already highlighted these concerns at the Regulation 18 stage and are disappointed that they have not yet been addressed.

Policy HO5: Housing estate renewal and regeneration

Green space and play areas on housing estates should be retained and even expanded to ensure there is sufficient open areas for residents to exercise, socialise and relax. For example, on the Grange Farm Estate (Site Allocation O4 – Grange Farm). These spaces should be protected with Town/Village Green status or Local Green Space designation.

Policy G11: Green Belt and Metropolitan Open Land

We support the Plan's intention to protect the openness and permanence of the Green Belt and MOL, according to the National Planning Policy Framework (NPPF). We would like the Plan to explore new areas of green space that could be designated as MOL, including land which is currently not available to Harrow residents or has been taken out of public use by developers (see the Derelict Green Sites section below). We are pleased that the Council will resist any alteration to the boundaries of MOL at Site Allocation O5 – Harrow School Estate & John Lyon School. However, we do not support the following site allocations due to their impact on Green Belt:



- **Site Allocation GB1 – Royal National Orthopaedic Hospital (RNOH):**
Any redevelopment of this site must be restricted to within the boundary of the existing developed area and there should be no development outside of these boundaries. The Green Belt within this site must be retained and protected as it is clearly connected to the wider Green Belt. Any loss of Green Belt on this site to new development would be inappropriate. Exceptional circumstances cannot be said to exist. The Government’s planning policy for traveller sites clearly states that “Traveller sites (temporary or permanent) in the Green Belt are inappropriate development”.¹
- **Site Allocation GB2 – Watling Farm:**
We support fair and equal treatment for gypsy and traveller communities that facilitates and supports their traditional and nomadic way of life. We also recognise that the Council has a duty to provide pitches and plots for these communities in the Harrow local authority area, in line with national Government policy. However, we strongly object to the inclusion of Green Belt as site allocations for delivery of Gypsy and traveller pitches. We urge the Council to explore alternative sites on the borough’s plentiful supply of previously developed brownfield land.

Policy G12: Open Space

We strongly support the Plan’s commitment to ensure that development proposals must not result in the net loss of open space. The Plan should address green space needs in terms of green space per person to reflect any deficiency which may be created through high density development and more generally to ensure there is enough green amenity space. The Plan should also introduce a policy to create new green open spaces especially in Areas of Deficiency. ‘Streetparks’ can be created from ‘grey space’ i.e. superfluous roads should be converted to accommodate new rain gardens, pocket parks or whole or part of a street converted to a ‘streetparks’ as has been done at Alfred Place in Camden.

Promoting better use of many hectares of public kerbside space in the Local Plan

A significant proportion of land in Harrow is kerbside space, most of which is likely to be used free or cheaply for private car parking. This space is increasingly needed for all kinds of green and active and sustainable travel infrastructure*. The Local Plan should propose, or at a minimum be underpinned by a proposal to, re-allocate of land-use for at least 25% of Harrow’s kerbside space – referencing environmental, transport and health goals and establishing an appropriate target for reinstating kerbside as a public space.

*Kerbside space is needed for bus and cycle lanes, cycle parking (secure, hire and visitor), shared mobility parking (including car share), delivery hubs, rain gardens, tree planting on build-outs, EV charging points on build-outs, parklets, pocket parks, play on the way features/play trails, and whole streetparks (e.g. as per Lambeth Council’s Kerbside Strategy).

Climate adaptation policies

Strong policies are needed to promote management of rainwater on site of new development, taking rainwater from roofs into ponds or wetlands or for grey water recycling for household use; and via changes to existing buildings, for example by requiring SUDS planters, water butts, dual aspect buildings (to promote through draught), appropriate insulation, shared / sustainable energy etc.

¹ www.gov.uk Planning policy for traveller sites - GOV.UK (www.gov.uk) Policy E.



Designating green spaces which are protected but which do not have a clear identity and/or could make a strong contribution to nature recovery and/or wetland creation/flood management. Policies are needed to ensure the Local Plan underpins nature and water/flood management goals. For example:

- Under CN3: Reducing Flood Risk and CN4: Sustainable Drainage, the Council should identify any derelict green sites or disused playing fields (whether privately owned or not) and allocate these for a clear green infrastructure purpose i.e. with a nature, flood management or recreation designation.
- Railway sidings can and should be allocated for nature recovery.
- Front and back garden vegetation / natural surfaces can be protected – including with TPOs for trees and as part of Pavement Crossover policies.
- We have created a map showing sites in Harrow which are not being actively managed, possibly derelict, usually neglected, sometimes deliberately. These are sites which are usually protected Green Belt or Metropolitan Open Land - protected from development to ensure London does not sprawl into the countryside and so land in London is used efficiently - and so there remain large open spaces within the city in perpetuity. The sites are usually, but not always, in private ownership. They may have been bought by speculators and developers. The map can be viewed here: https://www.google.com/maps/d/u/0/edit?mid=17h5tIN5_WE1D7a4kWHsTAifxUw_-1-s&usp=sharing
- Our interest in identifying these sites is to demonstrate that there are many sites which have vast potential to fulfil the Mayor's habitat creation targets - as well as sites to build the many wetlands which are needed to make London resilient to climate change and to filter rainwater from road drains to stop road run-off pollution going straight into London's rivers.

Designating space for woodland creation

Finally, attached to this submission is a separate image file outlining our proposed M25 of trees route. The line in yellow shows route for creating connectivity in tree cover around the capital, across borough boundaries. We very much hope that as part of its land-use planning, Harrow Council could support and encourage a range of treescape along this line ranging from planting and allowing natural regeneration of native woodland, to orchard areas, to areas of intensified street tree planting and the creation of garden streets in response to the urgent need for action on climate change and biodiversity strengthening. We are happy to talk to the Council about the map and how it has been created. It is important to stress the route is provisional and we are in the process of further landowner and community engagement to provide a further layer of verification of the suitability of these sites. A higher resolution zoomable version of the map, and underlying information, is available direct from Greenspace Information for Greater London (GiGL). Members of the Tree Ring Steering group include The Conservation Volunteers, Woodland Trust, Trees for City and Forestry England. The plan also has the unanimous support of the More Natural Capital Coalition - a coalition of 19 environmental charities working across the capital.

We have identified the following sites in Harrow which could be considered for tree planting and woodland creation to contribute to a London Tree Ring Community Forest:

HRW001 The Hive / Whitchurch Lane

- Location: [Google Maps](#)
- Size of area for woodland planting 4 Ha
- Ownership: Football First Ltd, The Hive
- Site Information: Rectangular site north of the Hive stadium— prone to waterlogging? Not classified as Green Belt.



HRW002 Watling Farm South

- Location: [Google Maps](#)
- Ownership: Harrow Council
- Size of Area for woodland planting: 20-60 Ha
- Site Information: Area to south of Watling Farm

HRW003 Sylvia Avenue Open Space

- Location: [Google Maps](#)
- Ownership: Unknown on Land Explorer, LandApp confirms a single owner
- Size of Area for woodland planting: 48.6 Ha
- Site Information: Potential for tree planting round edges?

HRW004 Pinnerwood Farm

- Location: [Google Maps](#)
- Ownership: Limited Company
- Size: 21.1 Ha

HRW005 Raghuvanshi Trust Sports Ground and Hall

- Location: [Google Maps](#)
- Ownership: Limited Company
- Size: 18.8 Ha
- Site Information: Potential for limited tree planting along the River Pinn and alongside the small patch of woodland on the sports ground's northern boundary

Thank you for considering these points.

Yours faithfully,


Campaigns Officer
CPRE London