



Planning Policy Team, London Borough of Harrow

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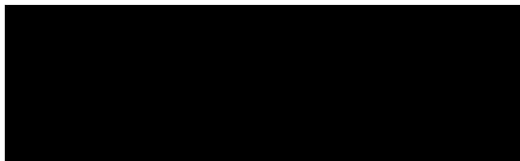
Dear Planning Policy Team,

Brent Council welcomes the opportunity to respond to the London Borough of Harrow's consultation on its New Local Plan 2021-2041 Proposed Submission (Regulation 19) version, November 2024.

Brent Council is supportive of many of the policies and aspirations within the draft New Local Plan and is keen to continue a joint working relationship with the LB Harrow to deliver benefits for the local area and communities. We submitted our formal comments on the Regulation 18 stage draft Local Plan on 23<sup>rd</sup> April 2024 and we acknowledge that a number of our comments resulted in changes being made to the draft Local Plan. We note that this Regulation 19 stage draft Local Plan includes new site allocations and updated Protected Views. We comment on these, and a number of other matters, below.

We hope these comments will prove useful in informing Harrow's Local Plan policies. Should you have any queries on this response please contact Hilary Seaton at [planningstrategy@brent.gov.uk](mailto:planningstrategy@brent.gov.uk).

Yours sincerely,



Spatial and Transportation Planning Manager  
Neighbourhoods & Regeneration  
Brent Council

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<p><b>General comments on housing delivery</b></p>			<p>In our comments at Regulation 18 stage we highlighted that, from Brent's perspective, Harrow's Local Plan should be more ambitious and proactive in terms of providing additional housing. We urged Harrow to place a greater emphasis on a proactive approach towards increased housing delivery, in the interests of local and London-wide social, economic and environmental benefits.</p> <p>We note that additional wording has been added to the 'Spatial Vision' second paragraph (page 22): 'The borough's housing and economic needs will be met and...' and this is welcomed.</p> <p>The Plan anticipates the Harrow &amp; Wealdstone Opportunity Area as remaining a focal point for development. We acknowledge that a range of site allocations have been identified for inclusion within the Plan and that together these have an estimated indicative capacity of 8,882 dwellings (Table H1 on page 101). We welcome the commitment in Strategic Policy 01: High Quality Growth, part f. (page 31) to ensure development of a site is fully optimised whilst respecting the character of the area it is located in. We are very supportive of the emphasis on site optimisation set out in Policy GR12: Site Allocations and its supporting text (pages 80-82) including signposting London Plan policy and guidance.</p> <p>However, apart from the Harrow &amp; Wealdstone Opportunity Area and the site allocations, the Plan does not clearly delineate areas where more intensive development would be appropriate, including areas where it would be accepted that the character of the existing area would be likely to change over the Local Plan period (similar to the approach taken in Brent Local Plan policy BH4). We would urge Harrow to more specifically identify additional areas suitable for intensification, for example stretches along major roads with high PTAL scores. This would be likely to give clarity to prospective developers on opportunities and expectations and to help optimise growth in appropriate areas, increasing the contribution towards meeting London's very significant housing needs.</p>

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<b>Chapter 02: High Quality Growth</b>	30	Strategic Policy 01: High Quality Growth	We welcome the additional references to health improvement and creating healthy places within Chapter 02. This could be highlighted in the introductory sentence of Strategic Policy 01 with the addition of 'and promotes the creation of healthy and sustainable places'.
<b>Chapter 02: High Quality Growth</b>	61 and 403-404	Policy GR5: View Management	<p>We note that the protected views identified in Appendix 3 will be safeguarded in accordance with the Harrow Views Management Guidance (2024) and Policy HC4 (London Views Management Framework) of the London Plan (2021). Draft Policy GR5 states:</p> <p><i>'B. Where there is a protected view:</i></p> <p><i>a. Development within a Protected Views Restricted Corridor (shown in red) that exceeds the specified threshold height will be refused; and</i></p> <p><i>b. Development in the Protected Views Setting Corridor (shown in yellow) should form an attractive element in its own right and preserve or enhance the viewers' ability to recognise and to appreciate the landmark.'</i></p> <p>We note that that Protected Views Restricted Corridors do not extend into the Borough of Brent. However, two Protected Views Setting Corridors extend into the Borough of Brent:</p> <p><b><i>Protected Views Setting Corridor: Old Redding</i></b>  This extends into the north western edge of Brent including part of the Northwick Park Growth Area, beyond which are views towards Wembley and Central London. Planning permission, partly in outline and partly detailed, has already been granted for development within this growth area. The Brent Local Plan includes Policy BNWGA1A: Northwick Park Growth Area which highlights that, although subject to transformational change, the scale of development will need to respond positively to its surrounding context, particularly with regards to building heights. We consider</p>

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			<p>that the proposed Protected Views Setting Corridor is compatible with the redevelopment aspirations set out within the Brent Local Plan.</p> <p><b><i>Protected Views Setting Corridor: Football Lane</i></b>  This extends across the North Wembley and Preston areas within Brent towards Wembley Park. The Harrow Views Management Guidance (2024) states that it is possible to gain impressive panoramic views over the ridgelines of the Harrow School buildings towards central London and also including Wembley Stadium. Key landmarks in the background to the view include Wembley, the Shard, Post Office tower, and Canary Wharf.</p> <p>We consider that the proposed Protected Views Setting Corridor is compatible with the policies set out within the Brent Local Plan which promote the continued regeneration of Wembley to include additional high quality, tall buildings. Tall buildings between this viewing point and Wembley Stadium would be viewed as part of a cluster of modern development within a dense urban setting close to Wembley stadium, behind which longer distance London views would continue to be appreciated.</p>
<b>Chapter 08: Responding to the Climate and Nature Emergency</b>	256	Para 8.3.8	<p>We suggest adding the text in bold/italics to para 8.3.8:  Harrow’s Local Flood Risk Management Strategy (2016) outlines the priorities for local flood risk management, assesses risk, provides a delivery Action Plan, and identifies roles and responsibilities of authorities. <b><i>The London Surface Water Strategy seeks to increase London’s resilience to surface water flooding. Harrow falls within the Brent and Harrow Stream Surface Water Catchment Partnership. The Strategy will facilitate collaboration across administrative boundaries and with multiple strategic partners, including securing funding for surface water management projects and maintenance more efficiently.</i></b></p>
	256	Para 8.3.10	<p>We are aware that mitigation measures in Harrow could have a positive impact in terms of improving water quality and reducing flood risk in Brent.  We suggest adding the text in bold/italics to para 8.3.10:</p>

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			Harrow will work <b><i>proactively with the London Borough of Brent within the context of the Brent and Harrow Stream Catchment Partnership</i></b> and with the West London LPA and Strategic Flood Group to adopt a catchment based approach to flood alleviation, <b><i>mitigating water pollution and improving water quality across the network of waterways</i></b> , and <b><i>to</i></b> the collection and use of developer contributions to fund mitigation measures.
<b>Chapter 10: Transport and Movement</b>	281	Policy M2: Parking	We are broadly supportive of this policy. We agree that car free developments should be the starting point in areas of high PTAL and that are well connected to public transport. However, we would reiterate that there is also a need to ensure that sufficient mitigation measures are put in place to limit on-street parking in neighbouring residential areas that may occur as a result, including in neighbouring boroughs. We suggest that this point forms part I. of Policy M2.
<b>Chapter 11: Site Allocations</b>	372	O16: Travellers Rest, Kenton Road	This site, which borders the railway on its western side, provides considerable scope for height, both along Kenton Road and further north within the site. Indicative heights might be included in the site allocation summary, for example 5-6 storeys. This would acknowledge that the site benefits from being adjacent to both the railway and to a wide, major road junction and would reflect building heights that have come forward on the Brent side of Kenton Road, such as Hillrise Court, 135 Kenton Road, to the immediate south west of Kenton station. Indicative building heights may give confidence to prospective developers regarding the scale of development likely to be acceptable in this context, promoting compliance with London Plan policy D3 <i>Optimising site capacity through the design-led approach</i> .
<b>Chapter 11: Site Allocations</b>	375	O17: Kenton Road Telephone Exchange	This site sits along a stretch of road identified as an Intensification Corridor in the Brent Local Plan. Along this stretch of road, heights of around 15 metres or 5 storeys are envisaged for schemes falling within Brent.  Site allocation O17 states that opportunity exists for sensitive upward extension. However, as suggested above, including indicative building heights may give confidence to prospective developers regarding the scale of development which

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			might be acceptable in this context, promoting compliance with London Plan policy D3 <i>Optimising site capacity through the design-led approach.</i>