



12th December 2021

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

Dear whom it may concern

Response to London Borough of Harrow's Local Plan – Regulation 19

London Borough of Barnet (LB Barnet) has the following comments in respect of Harrow's Regulation 19 Local Plan.

Barnet's Local Plan

The Council have now received the Inspectors Report which finds the Plan to be sound and capable of adoption. The Council expects the Local Plan to be adopted in February 2025.

Spatial strategy

LB Barnet supports Harrow's spatial strategy to make provision for meeting its full identified housing need (16,040 (net) homes during the Plan period) as detailed in Strategic Policy 03, and sufficient employment floorspace as detailed in Strategic Policy 04. LB Barnet also supports the intention to meet the housing needs of existing and new communities, including appropriate levels of affordable housing and provision for other specific groups at sustainable locations together with the required supporting infrastructure, as detailed in Strategic Policy 01.

Edgware Town Centre

Edgware Town Centre is bisected by the A5. The centre is situated in the north-west corner of LB Barnet and with part extending into LB Harrow. Edgware is identified in the London Plan town centres network as a Major Centre. Edgware is identified as a Growth Area in LB Barnet's Regulation 19 Local Plan, which has been found sound by the Planning Inspectorate in November 2024.

LB Barnet are of the view that LB Harrow's Local Plan – Regulation 19 should specifically support and endorse the Edgware Growth Area Supplementary Planning Document (SPD) (June 2021), which was jointly prepared by both LB Barnet and LB Harrow. The document provides guidance on how Edgware

Town Centre can successfully undergo renewal and better serve as a destination for local residents and businesses, by supporting comprehensive redevelopment of key sites to reflect the aspirations of the SPD.

Support for the SPD is set out in Policy GSS05 - Edgware Growth Area of the LB Barnet's Main Modifications to the submission Draft Barnet Local Plan, and LB Barnet would expect a similar level of endorsement from LB Harrow.

Flooding

LB Barnet acknowledges that LB Harrow, in partnership with the North-West London Strategic Flood Group will work with providers to identify and undertake work to design and install strategic flood storage and attenuation drainage solutions (Para. 8.4.2).

Transport impact, including a review of the proposed Site Allocations

The Head of Transport Strategy at LB Barnet has reviewed the proposed Site Allocations with Harrow's Local Plan – Regulation 19 closest to the shared borough boundary and provided the following comments:

The proposed Site Allocations strengthens LB Barnet's point [raised in the Regulation 18 consultation] about the lack of a transport evidence base modelling the impacts on Barnet highways of the growth and development the Harrow Plan envisages. The proposals at the Royal National Orthopaedic Hospital (RNOH) (Site Ref. GB1), Watling Farm (Site Ref. GB2) and Stanmore LU Station (Site Ref. O22) in particular could generate additional traffic on the A5, the A410 (Spur Road), the A41 (a TfL road) and place additional pressure on some already busy key junctions or on the M1. LB Barnet would generally resist anything requiring additional road capacity either on LB Barnet's roads – or on TfL or National Highways roads within the Borough either.

LB Harrow needs to also consider the potential cumulative impact of their Site Allocations and those proposed by Hertsmere Borough in their draft Local Plan to the west of Borehamwood, Elstree Village and the east side of Bushey where there is an indicative capacity of 900 units.

There is some recognition in the Regulation 19 Plan of the Borough's shared designated Town Centres (Edgware and Burnt Oak) and the need for LB Harrow and LB Barnet to work together in the statement of Spatial Strategy, which is welcome. This could be carried forward into the actual policies, however.

The Harrow Local Plan – Regulation 19 as a whole is very light on public transport and would benefit from a single policy that sets out Harrow's priorities and a commitment to work with neighbouring authorities to deliver on them. This is particularly important given their aspirations for development at some locations that would require additional services to make them sustainable – for instance any substantial employment uses at the Royal National Orthopaedic Hospital (currently PTAL 1b at the most favourable location). As raised before, it would be helpful if the reasoned justification for this policy (para 10.0.8) highlighted potential enhancements of the public transport network to support delivery of the Plan.

The Council considers that the parking policy is unclear, although we acknowledge that the policy seems likely to change as part of the examination process. The one point of importance for LB Barnet is the need for LB Harrow to take account of LB Barnet's policy on parking in the town centres we share (Barnet's standards are set out in Table 20 of Policy TRC03 as set out in the Main Modifications).

As per LB Barnet's comments at Regulation 18 stage, *Policy M1: Sustainable Transport* of LB Harrow's Regulation 19 Local Plan should specify, where applicable, what elements of the policy require cross-boundary working with neighbouring boroughs, particularly where there are references to 'strategic' and 'local' networks.

In regard to Site GB1 (RNOH), the proposal is for 347 - 500 C3 units and potentially development of research and / or innovation facilities associated with the hospital given its national and international stature.

Most of the RNOH site has a PTAL of 1a; the area by the main gate has one of 1b. The western corner has one of zero. The main road access from the south is via Brockley Hill. The boundary with LB Barnet runs up the middle of the road so the Council would have a direct interest in any proposals as a local highway authority, including construction logistics, deliveries and parking. The modelling done for the Council's Local Plan Strategic Transport Assessment (pre-covid) shows both the A41 Edgware Way/A410 Spur Road and the Canons Corner (A410 and A5 Brockley Hill) junctions at above 85% of capacity at both AM and PM peaks – the Brockley Hill one at more than 90%. LB Barnet is of the view that any development proposal would have to demonstrate that:

- It would not be heavily car-based given the low PTAL. Just the other side of the Hertfordshire border is an office park (Centennial Park) which is served by one bus and sits in acres of car parking which would not be acceptable in London Plan policy terms
- It is accompanied by public transport options that makes the type and level of development sustainable. It's at the top of a very steep hill which probably limits the attractiveness of active travel. This would have to be more than simply funding a bus for a finite period; this has been tried in the past for the RNOH and when the funding ran out so did the buses.
- Any access from Brockley Hill works in highways terms.
- It – combined with additional demand from the allocated site proposals for Watling Farm and Stanmore Station car park - would not take the two junctions in LB Barnet over capacity. The Head of Transport Strategy is of the view there is probably limited scope for increasing the capacity of Canons Corner as there seems little spare space,
- It would require capacity enhancements on the A41 or M1 (although these are not LB Barnet's roads, Barnet would not want to see any enhancements in our area to enable this development). National Highways are already looking at capacity on the A1, to the east of this site, in light of the growth planned in Hertsmere.

The proposals would have to consider taking into account the development proposed in Hertsmere.

In regard to Site GB2 (Watling Farm) the only access is from the A41. It's PTAL 1a and the only public transport is a bus from Centennial Park, which involves crossing the A41 to access.

In reality the additional 10-11 pitches would be car-based (with business vehicles as well) and LB Barnet would need to be assured that this together with any increase in traffic from RNOH and growth in Hertsmere does not have the impacts on the junctions and the A41 mentioned earlier. LB Barnet would also want to see a holistic approach to public transport improvements to serve both these sites (GB1 and GB2).

In regard to Site O20 (Canons Park Station carpark) LB Barnet would need to be assured that development here did not put unacceptable pressure on the A5/Whitchurch Lane junction, taking account of the proposed Edgware town centre development proposals. This may be in the form of a car-free development.

In regard to Site O22 (Stanmore Station carpark) access to this site from the east is via the A410 and LB Barnet would need to be assured that taken with any increased traffic from the RNOH and Watling Farm etc this did not put unacceptable pressure on the Canons Corner junction. Again, this may be in the form

of a car-free development. The same concerns could arise with Site O21 (Anmer Lodge) however it is recognised this is further from Canons Corner, so may not have the same level of impact.

LB Barnet would welcome being consulted during the design and application stages of proposed Site Allocations referred to above, so as best to understand any impacts the proposals will have on LB Barnet.

Yours sincerely,

