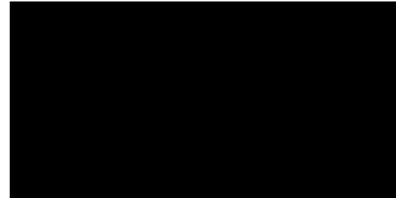




Planning and Economic Development

David Hughes
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Dear Mr Hughes

Harrow Local Plan (Regulation 19)

Thank you for notifying and consulting Hertsmere Borough Council on the LB Harrow Regulation 19 "Proposed Submission" document. This response comes from the Planning Strategy team at Hertsmere Borough Council, and is an officer response only.

Spatial Vision, Objectives and Strategy

Hertsmere's officers' support Harrow's priorities set out in the plan. We particularly support the boroughs approach to cultural and local identity led design by promoting heritage assets and high street regeneration. Hertsmere Borough Council supports the long term visions of boosting the local economy, protecting and strengthening existing infrastructure and delivery of housing.

Some concern is raised through reliance of small windfall sites to deliver homes however this is set out fully below.

Strategic Policy 03: Meeting Harrow's Housing Needs

Hertsmere Borough Council acknowledges Harrow's approach to meeting their housing need as set out by the Government Standard Methodology, a figure of 802 new dwellings a year, 16,040 by 2040/41. The proposed strategy of identifying the most sustainable locations for development first is supported.

It is noted that the Harrow Regulation 18 consultation only included strategic sites and allocations whereas the Regulation 19 process includes all sites which be considered suitable for development. Hertsmere accepts that the figures of projected housing delivery shown in Table H1 have been amended to reflect this.

There remains a significant reliance on both small sites windfall and implemented site allocations/pre-applications, each amounting to around 25% of the total housing requirement. The small sites windfall is tied to the 10 year targets in the London Plan but we note that this is based on a London-wide SHLAA from 2017 which may not be sufficiently up to date or robust to justify this as the largest element of your housing supply.

It is also note that Harrow are working to the proposed transitional arrangements set out in the draft NPPF 2024 to avoid an increase to a need of 2,294 per year. Under the current published draft

transitional arrangements, as this more than 200 below the new proposed standard method target, Harrow will be required to immediately review the plan to address the shortfall. This, with other boroughs in adopting a similar approach likely to have wider implications for growth across South West Herts and north London, requiring continued close working across all authorities in the area.

Strategic Policy 03: Meeting Harrow's Housing Need

We support the scope and ambition of this policy including the requirement that at least 70% of homes should be for low cost rent.

The absence of any requirement to deliver First Homes, as part of the intermediate housing element, would appear to be contrary to national policy (paragraph 66, as well as the Written Ministerial Statement) and national planning practice guidance. We fully acknowledge, as set out in paragraph 4.4.4, that low cost rented homes are genuinely more affordable than First Homes (and shared ownership) products; however, we consider that the absence of any requirement for First Homes needs to be more robustly justified and at the very least, it should be clarified whether these will be accepted as a type of intermediate housing.

The viability section of the policy, as drafted, appears to provide greater scope than envisaged by the NPPF for Affordable Housing viability to be challenged by applicants.

Under Vacant Building Credit (VBC), it is stated that its application would be supported where the applicant demonstrates compliance with the criteria set out in the policy.

Policy H06: Accommodation for older people

We welcome the requirement in 1, c) to provide Affordable Housing in line with Policy HO5 and are keen to ensure that the growth in this type of housing across outer London and Hertfordshire contributes to Affordable Housing wherever possible.

It is recommended that your Local Plan viability assessment also include an assessment of the viability of providing on or off-site Affordable Housing and/or contributions. The different costs associated with specialist forms of private sector housing may mean a different and potentially lower quantum of Affordable Housing provision and this would need to be acknowledged in either Policy H06 or Strategic Policy 03.

Strategic Policy 04: Local Economy

The supporting text to Policy 04 indicates that your Economic Development Needs Assessment (EDNA) (2017) projects a requirement for 6,000 sq m of industrial floorspace. Given the reported significant loss of industrial floorspace reported in Harrow between 2000/1 and 2019/20 (143,000 sq m) and the relative age of the EDNA, pre-dating the Covid pandemic, we are concerned that the projected 6,000 sq m requirement may represent an under-assessment of B2 and particularly B8 land requirements. Hertsmere continues to experience a high level of demand for distribution and warehousing development and we would wish to ensure that neighbouring north London boroughs make adequate provision for B2 and B8 requirements during the plan period.

Policy G11: Green Belt and Metropolitan Open Land

We note that point A(b) states that “development adjacent to Green Belt should not have a significant detrimental effect on the openness of the Green Belt, and must respect the character of its surroundings.” We are concerned that such a policy would not be justified or consistent with the NPPF. Whereas the impact of development on the setting of certain heritage assets is an important consideration, it is unclear how development adjacent to the Green Belt can or should be assessed in terms of its impact on Green Belt openness. Development of land outside of the Green Belt should not ordinarily be subject to the same tests as the development of land within the Green Belt.

With the publication of the new NPPF and the definition of the Grey Belt, Hertsmere borough Council would expect to see relevant land being released to provide for the shortfall in new homes being delivered by Harrow Council.

The Royal National Orthopaedic Hospital is referenced in the support text and is located close to the borough boundary with Hertsmere, serving a much wider community. We would support a pragmatic approach to redevelopment within the site which upgrades the current facilities and building stock.

Policy GR6 Areas of Special Character

A large area of the north of the borough is identified as an Area of Special Character and this includes open areas adjacent to Bushey Heath. Part of Bushey Hill Pastures itself extends into Harrow as documented in our own published [Landscape Sensitivity Assessment](#) (Landscape Character Area – P.14). We support the overall scope of Policy GR6 and would suggest the supporting text acknowledges this important landscape extends into Bushey Heath.

Policy HO12 Gypsy and Traveller Provision

We note the increase in proposed pitches to 12 at the existing Watling Farm site which is located close to the borough boundary with Hertsmere, and also in a general vicinity where there are a number of other Gypsy and Traveller sites along the A41 corridor. Policy H012 clarifies that there is no additional capacity at Watling Farm. Although your previous GTANA found no additional need for new pitches in Harrow, it is important that neighbouring London Boroughs take account of the needs of all Gypsy and Travellers (under the reinstated definition). We would expect the findings of the GLA's updated assessment to inform the next iteration of your Local Plan and should additional pitches/sites need to be found, we would want to ensure that sites are appropriately distributed across a wider area, taking account of the proximity of nearby sites in Hertfordshire.

If there are any queries regarding this letter, please do not hesitate to get in contact.

Yours sincerely,

