



NHS London Healthy Urban Development Unit

David Hughes
Planning Policy Manager
PO Box 1358
London Borough of Harrow
HA3 3QN

17th December 2024

Dear David,

Harrow Proposed Submission Draft Local Plan

Thank you for the opportunity to respond to the current local plan consultation under Regulation 19 of the Town and Country (Local Planning) (England) Planning Regulations 2012. This response has been prepared in consultation with the North West London Integrated Care Board and the local NHS Trusts.

We welcome that the Council has incorporated many of the comments, including proposed changes, we made in response to the earlier Regulation 18 consultation within the current document. However, we note that draft plan omits a policy requiring a health impact assessment (HIA) for major/ large scale schemes which is disappointing. While Policy LE1 A c) refers to ensuring an over proliferation of Sui Generis uses does not occur with paragraph 5.1.8 referencing uses that may have negative impacts such as casinos and shisha premises there are no details as to how this be assessed. Again use of HIAs may be a useful addition.

While the London Plan's Strategic Objective GG3 Creating a Healthy City sets out a requirement for assessing health impacts and minimising adverse impacts and maximising a policy within the Local Plan setting out criteria for requiring an HIA would assist in the effective delivery of the Council's Local Plan vision, in particular 'an ever-improving quality of life' and the strategic objective 'mixed and inclusive communities', Without this the delivery of these aspects of the local plan we believe will be less effective.

The scale and scenarios for an HIA would be for the Council to decide, however there is NHS HUDU and other guidance which could be used to help set the criteria and reference in the supporting text.

The Plan and supporting Infrastructure Delivery Plan recognises the existing pressure on the NHS facilities and services for local communities, and we welcome the reference to provision of floorspace for the NHS across a number of site allocations. It is important that all site allocations contribute to the mitigation of their impact on the NHS and that space onsite may not be the preferred affordable and sustainable option in every case.

Site OA16 – Kodak

The Kodak site allocation, as drafted, requires a minimum floorspace for health of at least that already consented on the site, however, should this prove to be unaffordable for the NHS, or not the preferred option for increasing capacity when the site is brought forward then there should be a requirement for financial contributions to expand health facilities off site. The opportunity to include the flexibility to enable the provision of integrated neighbourhood space with other social infrastructure on an affordable and sustainable basis is welcomed. The NWL ICB is finalising its estate strategy and ongoing discussions with the Council are welcomed.

Site O1 – Waitrose South Harrow

We ask that the requirement in relation to the NHS floorspace for Site 01- Waitrose South Harrow is set out as for other site allocations where there is not an existing permission for health space or an existing health facility.

Under 'Requirements' in 'Developer Contributions'

~~NHS Floorspace~~ *NHS floorspace (having regard to the identified need at the time and the delivery of NHS floorspace on other allocated sites)*

We look forward to ongoing engagement with the Council as the plan progresses and in its implementation. In the meantime, should you have any queries regarding our response please do not hesitate to contact me.

Yours sincerely,



Head of the NHS Healthy Urban Development Unit