

Statement of Common Ground

between

The London Borough of Harrow

and

London Borough of Ealing and London Borough of Brent

**In relation to the provision of burial space and the preparation of the
Local Plan for the London Borough of Harrow 2021 - 2041**

February 2025

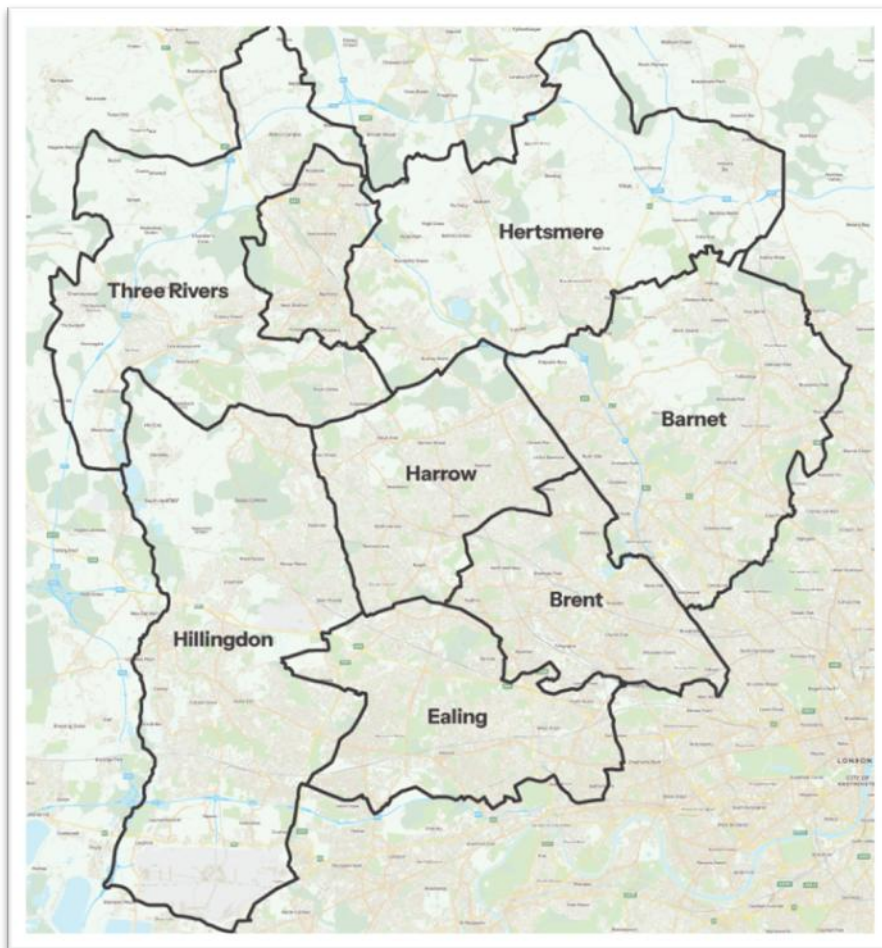
1. Introduction

1.1 This Statement of Common Ground has been prepared by The London Borough of Harrow (“LBH”) and the London Boroughs of Ealing and Brent, hereafter referred to as ‘the parties’

1.2 It sets set out the agreed planning policy position between the parties on the provision of burial space, in relation to Harrow’s New Local Plan 2021-2041 Proposed Submission (Regulation 19) version, November 2024 (the emerging Local Plan).

2. London Borough of Harrow Profile

2.1 LBH is an Outer London borough located in north west London. It borders four other London boroughs - Barnet to the east, Brent to the southeast, Ealing to the south and Hillingdon to the west. The Hertfordshire districts of Three Rivers and Hertsmere are located to the north. The map below shows Harrow and surrounding boroughs.



2.2 Covering a total area of 50.47 km², LBH incorporates the Metropolitan centre of Harrow, the Major Centre of Edgware (part) and the District Centres of Wealdstone, North Harrow, Pinner, Rayners Lane, South Harrow, Stanmore and parts of Burnt Oak, Kingsbury

and Kenton. The Borough also contains a number of designated Local centres and Parades.

2.3 The borough has a resident population of approximately 261,200. Household sizes are significantly larger than the London average. 32.5% of households have 4 or more people compared to the London average of 24.1%. There are also a significantly lower proportion of lone person households (12.1%) than the London average (20.1%).

3. Plan Making Summary

London Borough of Harrow

3.1 LBH commenced the evidence gathering process for its Local Plan in 2018. A document seeking views on the issues that the Local Plan should cover was issued for consultation in February 2024 (Regulation 18). As part of this process, an open ‘call for sites’ exercise was also undertaken and the development of ‘reasonable alternative’ spatial options and policies prepared and analysed to enable preferred options to be identified.

3.2 Feedback from the earlier stages of the plan making process and the conclusions of all the completed evidence base documents were used to prepare the Regulation 19 version of the plan, which was published for comment on 4th November 2024 until 17th December 2024. Evidence on burial spaces is contained in the Infrastructure Delivery Plan and the London Borough of Harrow Burial Spaces Context Report (‘The Context Report’).

3.3 LBH will submit the Regulation 19 version of the plan for examination after full consideration of all representations received. The plan is intended to be examined against the December 2023 National Planning Policy Framework (NPPF), as enabled by the 2024 NPPF transitional arrangements.

London Borough of Ealing

3.4 Ealing’s draft New Local Plan and all supporting documentation were submitted to the government on 18th November 2024. The Council is awaiting confirmation of the next stages of the examination process. The latest evidence on burial spaces is contained in its Infrastructure Delivery Plan.

London Borough of Brent

3.5 Brent formally adopted its Local Plan in February 2022. The Council has not formally commenced the production of a new Local Plan.

4. The Strategic Matter - Provision of Burial Space

London Borough of Harrow

4.1 Harrow has eight existing cemeteries, all of which are at or approaching capacity. The Burial Space Context Report also identifies provision at Carpenders Park Lawn Cemetery, Watford and Breakspear Crematorium in the London Borough of Hillingdon.

4.2 The Burial Space Context Report concludes that identified demand for future burial space is estimated to be between 200-300 grave spaces, requiring between 900-1,350 sqm of land per annum. Considering the needs of different faith groups within the borough, the highest demand is likely to come from the Muslim and Christian cohorts.

4.3 An assessment of the Council's Cemeteries and surrounding areas for expansion is required to ascertain where future burial space supply will be located. New burial space may be suitable in other areas across the borough, potentially within the green belt. An assessment of how many existing graves may be reusable for additional burials should also be undertaken. These measures will partially assist in meeting future demand.

London Borough of Ealing

4.4 There are seven sites across Ealing that have been classified as churchyards or cemeteries, covering 20.74 hectares in area. Two of the sites are managed by external Local Authorities (the Royal Borough of Kensington & Chelsea and the City of Westminster) and no burial provision is provided for Ealing Council residents.

4.5 The Audit of London Burial Provision report prepared in 2011 (as referred to in Ealing's IDP) notes that the borough is unlikely to be able to meet demand for burial space over the next 20 years. This is due to a significant problem with cemetery capacity, with some cemeteries no longer in use. There is also insufficient traditional Islamic burial space at present. However, there are currently no identified schemes planned to meet demand.

London Borough of Brent

4.6 Four cemetery sites serve Brent's needs. Within the borough these are Alperton, Paddington Old and Willesden New. Carpenders Park Lawn Cemetery also serves the borough in Three Rivers District near Watford.

4.7 The four cemeteries represent a total of 43 hectares of green open space with a further 3 to 4 hectares available for future use at Carpenders Park. The borough remains reliant on burial space outside its boundary and the latest evidence suggests that the supply of suitable plots will be exhausted if no action is taken.

5. Agreed approach to meeting the demand for new burial space

5.1 The three boroughs recognise the scarcity of burial space within their respective boroughs, with the issue having been raised during ongoing Duty to Cooperate meetings, as well as being a standing item on the agenda for the quarterly West London Alliance (WLA) planning policy officers meetings.

5.2 The three boroughs have agreed to work together to address this issue, with the following initial measures being undertaken:

- (a) *Site search work commissioned by Ealing to look at potential burial space sites outside Ealing / London would have regard to sites that would be of sufficient size to meet the provisional needs of the three boroughs and if this identified such potential opportunities these would be brought to the other boroughs' attention for consideration and if warranted, investigations progressed through formal joint working arrangements.*
- (b) *Harrow would continue to consider sites within its own borough to potentially meet part or all of its own needs and has approached appropriately experienced property consultants to undertake this work; this work will be undertaken in 2025/26.]*
- (c) *The three boroughs will participate in the forthcoming London-wide Audit of London Burial Space Provision being undertaken by the Mayor of London to inform the forthcoming new London Plan. The audit is planned to be undertaken during Autumn 2025. It is understood from the GLA that the project will update the last audit and, at present, no significant divergence from the existing methodology is planned. Overarching aims will be to: determine existing and future supply and demand for space on a per borough basis; summarise capacities; and provide recommendations to address shortages. Once completed, it will form part of the evidence base for Borough-wide work on burial space and for each Borough's development plan.*

5.3 The parties are satisfied that in the context of this strategic cross boundary matter, the requirements of the duty to cooperate have been met.

6. Governance Arrangements Including Future Review

6.1 The parties agree to:

- Keep a dialogue open on matters arising which are likely to have significant impacts and implications for the delivery of local plan policies;
- To review and update this Statement of Common Ground in the light of any material change in circumstances; and
- To maintain positive principles of cooperation.

7. Signatories

7.1 We agree that this statement is an accurate representation of matters discussed, and issues agreed upon.

	On behalf of the London Borough of Harrow	On behalf of London Borough Brent	On behalf of the London Borough of Ealing
Signed by			
Name	Viv Evans	Paul Lewin	Steve Barton
Position	Chief Planning Officer	Spatial and Transportation Planning Manager	Strategic Planning Manager
Date	24 February 2025	25 February 2025	24 February 2025