

**Statement of Common Ground**

**between**

**The London Borough of Harrow**

**and**

**Hertsmere Borough Council**

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

**February 2025**

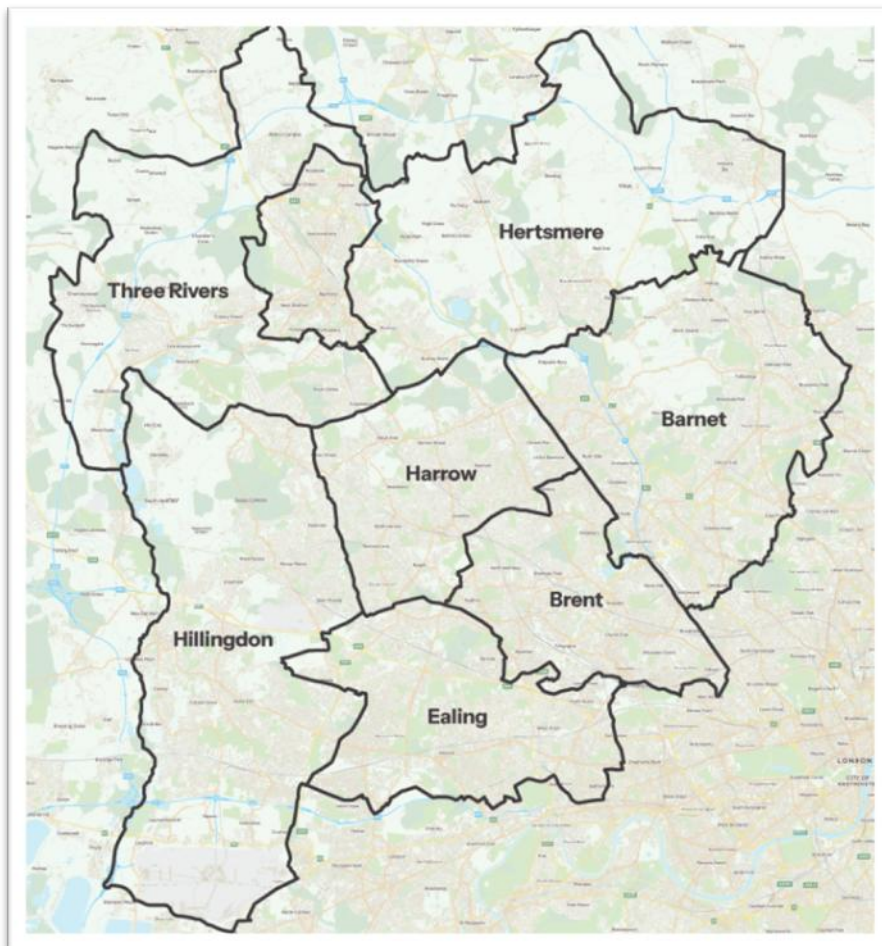
## 1. Introduction

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

1.2 It sets out the agreed planning policy position between the parties 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 northwest 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 km<sup>2</sup>, 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 the emerging Local Plan in 2018. A document seeking views on the issues that it 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 4<sup>th</sup> November 2024 until 17th December 2024.

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

#### *Hertsmere Borough Council*

3.4 The current Development Plan for Hertsmere includes the Hertsmere District’s Core Strategy, adopted January 2013, the Elstree Way Corridor Area Action Plan, adopted July 2015 and the Site Allocations and Development Management (SADM) Policies Plan document adopted in November 2016.

3.5 Hertsmere commenced the production of a new Local Plan in 2016. Consultation on the latest Regulation 18 version of the Plan closed on 29<sup>th</sup> May 2024. Responses to this document are currently being considered.

### **4. The Strategic Matters**

#### ***Engagement on strategic cross boundary matters***

4.1 The parties recognise the functional market and land-use relationships that exist between their respective local authority areas. These include cross boundary commuting and employment activities, shopping and leisure trips. Effective transport infrastructure is necessary to maintain these functional relationships over the plan period.

4.2 The parties have engaged to discuss relevant strategic cross boundary matters throughout the preparation of the emerging Local Plan.

4.3 The duty to cooperate activities between the parties are recorded in the Harrow Regulation 19 Duty to Cooperate Statement November 2024. An updated version of this document will be published at the point of submission.

4.4 The parties agree that the relevant strategic cross boundary matters are as follows:

- Housing need and supply (including the provision of sites for Gypsies and Travellers);
- The supply of retail and employment land; and
- The provision of infrastructure, including burial space.

4.5 The parties acknowledge that Hertfordshire County Council (HCC) is the highway authority for Hertsmere and that on highways and transport matters, this is a relevant strategic cross boundary matter with HCC.

***Housing need and supply (including the provision of sites for Gypsies and Travellers)***

4.6 The parties are located in separate but adjacent Housing Market Areas (HMA) with Hertsmere being located in the South West Hertfordshire HMA. The emerging Harrow Local Plan proposes to adopt a housing requirement/target of a minimum 16,040 homes between 2021-41 (being the annualised London Plan target of 802 homes per year over the 20-year plan period), in general conformity with the London Plan. The parties acknowledge that notwithstanding any Local Housing Need figure for Harrow published by the government in December 2024, the draft plan will be considered under the NPPF 2023 by virtue of paragraph 234d of the NPPF 2024.

4.7 The proposed housing target includes self-contained residential units and non-self-contained residential accommodation, including specialist housing for students and older people in use classes C2, C3 and C4 or sui generis.

4.8 The expected supply of new homes outlined Table H1 of the emerging Local Plan indicates that the minimum housing requirement as apportioned by the London Plan can be met. The spatial strategy outlined at paragraph 1.1.8 of the draft Plan proposes to deliver a minimum 8,750 homes in the Harrow and Wealdstone Opportunity Area. Hertsmere has, in its representations on the Regulation 19 Plan, noted that there is a significant reliance on small windfall sites amounting to around 25% of the total housing requirement.

4.9 A formal request to accommodate unmet housing need was received from Hertsmere Borough Council on 31 January 2020. LBH responded to this request on 19

February 2020, noting that it was not in a position to accommodate this need. The correspondence associated with this request are outlined in Harrow's Duty to Cooperate statement. Housing need has been discussed subsequently, but to date no further formal requests have been received from Hertsmere for Harrow to meet their unmet need. As LBH is seeking to meet its London Plan target requirement in full, it has not requested that Hertsmere meet its unmet need.

4.10 The provisional findings of the Gypsy and Traveller Accommodation Needs Assessment (GTANA) for the Greater London area have been provided to LBH and indicate that between 13 (cultural definition) and 12 (PTTS definition) additional pitches are required to address the future accommodation needs of Gypsy and Traveller households through to 2032. LBH has not requested that Hertsmere meet any remaining unmet need which exists during the remainder of the plan period. The parties acknowledge that, based on the emerging GTANA, there is no requirement for specific provision to be made for travelling showpeople through to 2032.

4.11 LBH has identified a supply of land to accommodate 13 pitches should the final GTANA identify that as the need figure for Harrow in the context of the revised PPS

#### ***The supply of retail and employment land***

4.12 Supporting evidence confirms that the following floorspaces will be required in Harrow over the period of the emerging Local Plan:

- Combined retail, food / beverage, leisure and entertainment - 13,900sqm
- Industrial – 6,000sqm

4.13 In Harrow, the demand for office space has continued to decline since the pandemic, while availability of leasable space has risen in tandem. There has been a significant reduction in office space in the borough, and whilst there is no evidential need for further office space, any further release of office space must be managed to ensure sufficient floorspace is retained.

4.14 The emerging Local Plan proposes to meet retail and employment floorspace requirements in full.

#### ***The provision of infrastructure, including health, education, utilities, flood risk***

4.15 LBH has prepared Infrastructure Delivery Plans (IDPs) to identify infrastructure needs arising from planned growth. These important documents reflect all aspects of infrastructure need.

4.16 The parties do not expect planned growth to generate significant additional needs for community infrastructure (school places and healthcare facilities) in adjoining authorities. The LBH IDP indicates no significant additional needs for community infrastructure within the Hertsmere administrative area. The Hertsmere

Plan is at an earlier stage of development with associated infrastructure requirements not fully confirmed at this stage although infrastructure work undertaken to date suggests that development in Hertsmere would not impact significantly on education and healthcare requirements in Harrow.

## **5. Areas of Agreement**

### **5.1 The parties agree that:**

- The functional relationships between the respective local authority relate to commuting and related employment activities, shopping and leisure trips. These will be maintained over the period of the emerging Local Plan.
- The respective local authority areas are subject to separate housing markets, with Harrow being part of the wider-London housing market.
- The emerging Local Plan makes provision to meet identified development needs identified in the associated evidence base and the London Plan (2021), including the housing target for Harrow.
- The Mayor of London has confirmed that the emerging Local Plan is in general conformity with the London Plan, in accordance with section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004 including the minimum 10 year targets for net housing completions (2019/20 -2028/29).
- Any additional homes provided in Harrow over and above this minimum target will contribute to London's wider housing need.
- Housing requirements in Hertsmere Borough are derived from the Government's 'standard method' for calculating housing need.
- Policy SD2 of the London Plan refers to collaboration across the wider south outside of London and notes that the Mayor will work with partners across the Wider South East (WSE) to address appropriate regional and sub-regional challenges and opportunities through recently-developed strategic coordination arrangements.
- The parties agree that the supporting evidence for the emerging Local Plan is robust and proportionate although Hertsmere has, in respect of the small sites windfall allowance, previously queried the use of the London-wide SHLAA (2017) on which it is based. The parties acknowledge that further evidence, the Harrow Small Sites Capacity Study 2022, has since been published
- The parties acknowledge that the Mayor of London has committed to preparing a new London Plan. The plan will be prepared under the NPPF 2024 and will set a new housing requirement for Harrow that any subsequent Harrow Local Plan will need to be in general conformity with. The new London Plan will become part of Harrow's development plan when published in its final form.
- Relevant engagement will continue beyond submission for some 'live' aspects of the evidence base, such as the emerging Infrastructure Delivery Plan.

- LBH has engaged effectively and on an on-going basis with Hertsmere Borough during the plan making process and that further active engagement will be undertaken as part of further stages of plan making in relation to the Hertsmere Local Plan.
- The parties are satisfied that 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.

	<b>On behalf of the London Borough of Harrow</b>	<b>On behalf of Hertsmere Borough Council</b>
Signed by		
Name	Viv Evans	George Pavey
Position	Chief Planning Officer	Planning Strategy Manager
Date	21 February 2025	25 February 2025