**Statement of Common Ground** 

between

The London Borough of Harrow

and

# The London Boroughs of Hillingdon, Ealing, Brent and Barnet

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

February 2025

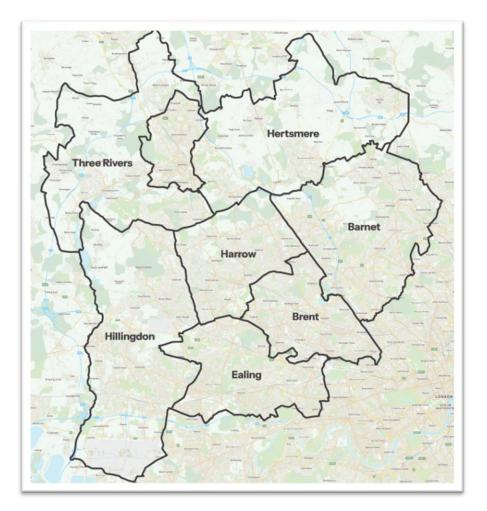
## 1. Introduction

1.1 This Statement of Common Ground has been prepared by the London Borough of Harrow ("LBH") and the London Boroughs of Hillingdon, Ealing, Brent and Barnet, 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 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 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 17<sup>th</sup> December 2024.

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 Hillingdon

3.4 Hillingdon's Local Plan Part 1 Strategic Policies and Local Plan Part 2 Development Management Policies and Site Allocations Documents were adopted in November 2012 and January 2020 respectively.

3.5 Hillingdon undertook a Regulation 18 consultation in March 2024 to seek views on the content of the replacement Local Plan. The Council is proposing to publish a Regulation 19 Proposed Submission version of the Plan in the first quarter of 2025.

# London Borough of Ealing

3.6 Ealing's draft New Local Plan and all supporting documentation were submitted to the government on 18<sup>th</sup> November 2024. The Council is awaiting confirmation of the next stages of the examination process.

## London Borough of Brent

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

#### London Borough of Barnet

3.8 Barnet's Core Strategy and Development Management Policies were published in September 2012.

3.9 Barnet is well advanced on the production of a new Local Plan. Examination hearing sessions were undertaken in September 2022 and following the receipt of the Planning Inspector's report the Council has now produced a consolidated version of the Local Plan, which incorporates all the Inspectors Main Modifications making the Plan capable of adoption. The Local Plan is due to be formally adopted by the Council on the 4th March 2025.

## 4. The Strategic Matters

## Engagement on strategic cross boundary matters

4.1 The parties have engaged to discuss relevant strategic cross boundary matters throughout the preparation of the emerging Local Plan, in the context of the London Plan, which provides a Spatial Development Strategy for all London Boroughs. This has included engagement on the various evidence base documents which underpin emerging policies.

4.2 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 the Duty to Cooperate Statement will be published at the point of Submission.

4.3 The parties agree that the relevant strategic cross boundary matters are:

- 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.

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

4.4 The emerging 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.

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

4.6 The expected supply of new homes outlined Table H1 of the emerging Local Plan indicates that the minimum housing requirement for Harrow as an apportionment of the London Plan requirement 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.

4.7 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,

4.8 LBH has identified a supply of land to accommodate these needs in the Borough.

## The supply of retail and employment land

4.9 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

4.10 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.

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

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

4.12 LBH has prepared Infrastructure Delivery Plans (IDPs) to identify infrastructure needs arising from planned growth. Infrastructure assessments are also undertaken at a West London level through the work of the West London Alliance. These important documents reflect all aspects of infrastructure need.

4.13 A key cross boundary issue between the boroughs in West London is the provision of sufficient land for burial space over the plan period. The London-wide need for burial space will be subject to further assessment by the GLA later in 2025. The boroughs of

Harrow, Ealing and Brent are working together to address the issue and agreement between these parties is documented in a separate statement of common ground.

4.14 The parties do not expect planned growth to generate significant additional needs for community infrastructure (school places and healthcare facilities) in adjoining authorities.

#### 5. Areas of Agreement

5.1 The parties agree that:

- LBH has engaged effectively and on an on-going basis with the London Boroughs of Hillingdon, Ealing, Brent and Barnet during the plan making process.
- The emerging Local Plan makes provision to fully meet identified development needs and there are no unmet needs to be accommodated elsewhere.
- The London Boroughs of Hillingdon, Ealing, Brent and Barnet are not seeking to accommodate any unmet development needs in LBH through their plan making processes.
- The parties agree that the supporting evidence for the emerging Local Plan is robust and proportionate.
- Necessary engagement in relation to the respective plans will continue up to the point of submission.
- Relevant engagement will continue beyond submission for some 'live' aspects of the evidence base, such as the emerging Infrastructure Delivery Plans and the Mayor of London's evidence on burial space.
- 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.

	On behalf of the London Borough of Harrow	On behalf of the London Borough of Barnet	On behalf of London Borough Brent
Signed by			
Name	Viv Evans	Neeru Kareer	Paul Lewin
Position	Chief Planning Officer	Assistant Director – Planning & Building Control	Spatial and Transportation Planning Manager
Date	18 <sup>th</sup> February 20245	18 <sup>th</sup> February 20245	25 <sup>th</sup> February 2025

	On behalf of the London Borough of Ealing	On behalf of the London Borough of Hillingdon
Signed by		
Name	Steve Barton	Tom Campbell
Position	Strategic Planning Manager	Planning Policy and Infrastructure Manager
Date	25 <sup>th</sup> February 2025	