

**London Borough of Harrow
Harrow's New Local Plan – Examination**

**Inspectors' Matters, Issues and Questions
for Hearing Sessions**

Introduction

- 1) Prior to the forthcoming hearing sessions, responses are invited from participants on the following Matters, Issues and Questions (MIQs) raised by the Inspector. The MIQs do not intend to cover every policy within Harrow's New Local Plan (the Plan). Instead, the MIQs are based on the Main Issues relevant to these hearing sessions as identified by the Inspector, taking into account the views of the Council and other representations made at the Regulation 19 Stage. Where cross reference to the evidence base are made, these use the references within the examination library. This note should be read in conjunction with the Inspector's Guidance Note which sets out further information regarding how the Examination hearings will be run.
- 2) In framing these MIQs, I have had regard to the definition of soundness as contained at paragraph 35 of the National Planning Policy Framework, 2023 (the Framework). This is because the Plan before me has been submitted under the transitional arrangements as set out at paragraph 234 of the 2024 Framework. The Framework establishes that policies should be clearly written and unambiguous, so that it is evident how a decision maker should react to a development proposal. Issues relevant to the legal compliance of the Plan are also addressed within my MIQs. In responding to the MIQs and where it is necessary to reference Examination documents produced by the Council, these should be clearly cross-referenced by providing the document reference, page and paragraph numbers.
- 3) Further information about the Examination, hearing sessions and the format for written statements is provided in the accompanying Guidance Note, and the Planning Inspectorate's Procedural Guide which should be read alongside the MIQs.

London Borough of Harrow

Local Plan

Matter 1: Legal Compliance and the Duty to Cooperate

Issue 1: Whether the Duty to Cooperate (DtC) has been satisfied and whether the Plan has been prepared with reference to the relevant procedures and regulations

Duty to Cooperate

Questions:

The Duty to Cooperate Statement (CSD04) refers to a number of meeting which have taken place with neighbouring boroughs. Please could you provide the minutes to the meetings referred to as follows -

1.1 Paragraph 3.10 refers to Quarterly meetings to discuss planning work through the West London Alliance – please provide some more detail in relation to these matters. What date did the meetings commence? Were the meetings reoccurring precisely on a quarterly and regular basis? Are all of the matters you have referred to at a-h cross boundary matters in the context of the Harrow Local Plan?

1.2 In relation to the engagement which has taken place with Three Rivers District Council, please provide the minutes of the meetings referred to at paragraph 3.14 of the DtC statement (24 March 2020, 9 June 2020, 10 April 2024) . Where the text refers to letters (15 June 2021 letter from Three Rivers requesting Harrow to accommodate unmet need, response from Harrow dated 1 July 2021) please could you also provide copies of these letter. Where formal response to the regulation 18 consultation are referred to (9 March 2023, 24 November 2023) please provide copies of these consultation responses.

1.3 In relation to the engagement with Hertsmere Borough Council as set out within the DtC statement as well as the Statement of Common Ground (SoCG), please provide the minutes of the meetings referred to at paragraph 3.14 of the DtC statement (22 April 2021, 10 October 2023, 15 May 2024) . Where the text refers to letters (10 February 2020, 19 February, 31 January 2020) please could you also provide copies of these letters. Where formal responses to the regulation 18 consultation are referred to, please provide copies of these consultation responses (these should be appended to the hearing statement) .

1.4 The Joint London Borough SoCG refers to Hillington however they have not signed the document? What is the reason for this and what matters cannot be agreed upon?

1.5 Are there any other SoCG being prepared¹? If so what are the timings for these?

¹ I am aware that the Council are in the process of producing further SoCG with a number of bodies (see LBH/ED3) however these have not been provided to date. Should further MIQ arise from these documents, I shall endeavour to issues these to the Council in advance of the hearing sessions opening.

1.6 Does the evidence base confirm that the Council have engaged constructively, actively and on an ongoing basis with the parties identified to address the strategic matters of relevance?

1.7 Are there any outstanding concerns from adjoining authorities or any other DtC bodies regarding the DtC? If so in what way has the Council sought to address the issues raised?

1.8 The SoCG concerning Burial Space advises that the Council are undertaking work to consider sites within its Borough. What is the precise timeframe for the completion of this work?

Other legal requirements

Issue 2: Whether the Plan has been prepared with due regard to the appropriate procedures and regulations

Questions:

Consultation

2.1 Has the plan been prepared in accordance with the Council's Statement of Community Involvement (ODS02) and has it met the minimum consultation requirements contained within the relevant Regulations?

2.2 Is there any evidence to suggest that the consultation carried out by the Council during plan making failed to comply with the Council's Statement of Community Involvement?

2.3 Concerns have been raised regarding the accessibility of the format of the consultation form provided and the time allocated for responses – are these concerns justified?

The Sustainability Appraisal (SA)

2.4 Has the IIA tested all reasonable alternatives?

2.5 To what extent has the IIA informed the content of the Plan?

2.6 The submission version of the IIA contained a number of incomplete references (pages 18/85/100) please could the Council provide a version of the report with the correct references. This should also be uploaded to the examination library with a note explaining what the errors in the references were and how these have been updated.

2.7 Are the reasons for selecting the sites contained within the plan sufficiently clear and have the reasons for discounting alternative sites been clearly articulated?

2.8 Overall, does the IIA demonstrate that the submitted plan is justified and would it comprise an appropriate strategy, taking into account the reasonable alternatives?

2.9 Document EBH01 refers at paragraph 4.12 to the IIA testing of alternative spatial strategies. At paragraph 4.13, part C, the text states that as set out in the Regulation 18

Draft Local Plan and IIA, this alternative would meet a greater proportion of the Borough's objectively assessed housing need. Can the Council clarify what this reference relates to?

Habitats Regulations Assessment (HRA)

2.10 Has the Habitats Regulation Assessment (HRA) been undertaken in accordance with the Regulations and is it robust?

Climate Change

2.11 Has the Council had regard to Section 19 of the 2004 Planning & Compulsory Purchase Act (As amended) requiring development plan documents to include policies designed to secure the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change?

2.12 With reference to Strategic Policy 8: Responding to the Climate and Nature Emergency, could the Council please identify these policies and set out how will they be monitored for their effectiveness?

Equalities

2.13 How does the Plan address the three aims of section 149 of the Equalities Act 2010 in relation to those who have relevant protected characteristics?

Local Development Scheme

2.14 Is the Plan compliant with the Local Development Scheme (LDS) and if not does the LDS need to be updated?

Matter 2 The Vision and Spatial Strategy, including Strategic Policies

Issue 3: Whether the Vision, Spatial Strategy and Strategic policies² of the Plan are positively prepared, justified, effective and consistent with national policy as well as in general conformity with the London Plan

Questions:

3.1 Do the Strategic Policies of the Plan look ahead for a minimum period of 15 years from adoption as set out within paragraph 22 the Framework?

3.2 Has the Plan been prepared to be in general conformity with the Spatial Development Strategy (the London Plan)?

3.3 Is the Plan clear which are the strategic policies of the Plan? Paragraph 0.0.30 (b) implies that the plan consists of 9 strategic policies. Is this correct? If this is correct, are the Council content that these policies cover the strategic priorities of the area, in accordance with paragraph 21 of the Framework? Please could the Council clearly

² The content of each strategic policy will be dealt with under the relevant Matter heading, Matter 2 deals with the overall plans approach to strategic matters

identify on a table which policies they are identifying as strategic and non strategic policies?

3.4 The Spatial Strategy for the plan is set out at page 25. Is the 1000 new jobs specific to the Harrow and Wealdstone Opportunity Area or across the borough generally? Is the text sufficiently clear in this regard?

3.5 Is the spatial distribution of development based on relevant and up to date evidence and in what way would the distribution of development proposed promote sustainable patterns of development in accordance with both national policy and the London Plan?

3.6 Does the map at page 28 represent the key diagram as required by paragraph 23 of the Framework?

3.7 Appendix 5 refers to the deletion of the current Local Plan documents. Under the Harrow Site Allocations and Harrow and Wealdstone Area Action Plan, the text states that *'any designations continue as shown on policies map'*. What does this mean?

Matter 3 Plan Viability, the SA and the approach to site selection

Issue 4: Is the Plans approach to viability, the SA and site selection justified and effective?

Questions:

Plan Viability and Infrastructure

4.1 Has the viability assessment been prepared in accordance with national policy and guidance?

4.2 What evidence is there to support the cost increase of 0.4% for the purposes of the 15% biodiversity net gain?

4.3 What has informed the £2500 per residential unit Section 106 costs identified at paragraph 4.28 of document EBLE02 ?

4.4 In terms of policy CN1, what evidence is there to support the offsetting tested at £95 and £880 per tonne of carbon emissions? The viability report refers to 'analysis by other London Boroughs' at paragraph 4.19 of the viability report. What is this analysis and is it part of the evidence base?

4.5 The viability report refers to the testing of two different scenarios in terms of the approach to net zero carbon and BREEAM (paragraph 4.17). As this document identifies a range of additional capital costs of achieving net zero carbon, what is the reason that the upper limit of 7% as not been tested? Is this a justified approach?

4.6 Have all the necessary policy requirements been taken into account?

4.7 To what extent does the evidence base demonstrate that the requirements of policy HO4 concerning the delivery of affordable housing are viable?

4.8 What has been used to inform the typologies selected and are these reflective of the growth planned within Harrow?

The SA and the Approach to Site Selection

4.9 The Site Selection Paper (EBH03) identifies the approach adopted to site selection throughout the Plan. Have the individual site allocations been chosen according to a robust site selection methodology?

4.10 Are the allocated sites identified at Chapter 11 of the Plan and mix of uses proposed justified and in what way do they reflect the outcomes of the SA and testing of reasonable alternatives through the site selection methodology?

4.11 Does the evidence demonstrate that there is a realistic prospect that each of the allocations will be deliverable within the Plan period? If this is not the case, is the allocation justified?

4.12 With regards to the sites that will be delivering in years 1-5 of the Plan period, are the timescales identified justified by the evidence base?

4.13 In terms of the site assessment and selection, paragraph 11.9 of the Plan advises that sites in the Green Belt or Metropolitan Open Land were excluded. This statement also appears within EBH03 however this statement does not appear to be correct in relation to the inclusion of sites GB1 and GB2? Could the Council please explain how the approach to sites within the Green Belt and Metropolitan Land has been consistently applied through the site selection methodology?

4.14 Document EBH03 states that site capacity has been calculated using a number of sources including a 10% uplift in residential capacity where design led capacities have been used. What is the justification for this approach? For some of the sites listed at table 5, the evidence base states that a 10% uplift has not been applied. What is the justification for this?

The IDP

4.15 Document EBIT01 summarises an infrastructure schedule at appendix 1. However, it is not clear from the items listed when they are expected to be delivered over the plan period. The annotation ranks these as essential/critical/ desirable/tbc/In. Please could the Council provide greater clarity in relation to these points. This can be done by setting out what the above terminologies mean in practical terms in and in terms of time frame. Secondly, can the Council set out what infrastructure is expected to come forward during years 1-5, 6-11 and 11 plus of the Plan period and how this relates to the site allocations proposed by the Plan.

4.16 Several of items listed as 'link to associated evidence base' do not work – can the Council revise these to ensure the correct document links are provided and if necessary, add these to the evidence base. Please provide a separate list of the documents referred to within the response to these MIQs.

Matter 4: Environment, Green Infrastructure and Social and Community Infrastructure

Issue 5 : Are the Plans policies which address the Environment, Green Infrastructure and Social and Community Infrastructure justified, positively prepared, consistent with national policy and in general conformity with the London Plan

Questions:

Burial grounds

5.1 The evidence base acknowledges that there is a shortfall in burial space within the wider west London area. EBIT02 identifies that there is a shortfall within Harrow Cemeteries of between 200 -300 burial spaces per annum. What is the latest position in relation to this matter?

5.2 The Council have referred to an application made to Three Rivers Borough Council for the expansion of the Carpenters Lawn Cemetery. There is no mention of the application within the SoCG with Three Rivers Borough Council. What is the status of this application?

Policy CL1: Safeguarding and Securing Social Infrastructure

5.3 Is policy CL1 sufficiently flexible to provide a basis for the assessment of any applications which may come forward and is it clear how the policy would be applied?

5.4 Paragraph 6.1.2 acknowledges that social infrastructure plays an important role in developing strong and inclusive communities. In light of this, why is it necessary for any proposals relating to new or enhanced social and community infrastructure facilities to demonstrate need?

5.5 Sport England have raised concerns regarding the wording of policy CL1 and whether it accords with paragraph 103 of the Framework. In the first instance, the definition of social infrastructure within the policy does not accord with the glossary. Secondly, I agree the current wording is not clear. The Council should look to address this through alternative wording.

5.6 Are parts B (b), (d) and (e) and C of the policy a justified and effective approach? Is the reference to enhanced social infrastructure at part A of the policy a justified approach?

Policy CL3: Sport and Recreation

5.7 Is part A of the policy justified by the evidence base and does it accord with national policy?

5.8 What is the purpose of part C (a and b) of the policy and policy GR7 A which appear to duplicate the same requirements?

Strategic Policy O6: Social and Community Infrastructure

5.9 Is the wording of part A ‘must’ and part e ‘requiring all development’ positively prepared?

5.10 Is the policy as drafted sufficiently flexible?

5.11 How does the wording of the policy, which put the onus on new development proposals to demonstrate that adequate infrastructure capacity exists, relate to the role and function of the Council and the IDP as identified at paragraph 6.0.1 and 6.0.2 of the Plan?

Policy GR11 Planning Obligations

5.12 In what way are parts A and B of the policy as drafted positively prepared?

5.13 Paragraph 2.11.3 cross references the IDP (EBIT01) which states that this document will form the basis for infrastructure and funding priorities across the plan period. Should this wording be contained within the policy?

Policy CN2 Energy Infrastructure

5.14 Does this policy take into account MOD safeguarding requirements and will the policy be effective in this regard?

5.15 In what way is part A of the policy consistent with the London Plan? Is the reference to counter terrorism infrastructure supported by the evidence base?

5.16 Is part E of the policy effective?

Ecology and flood risk

Policy CN3 – Reducing flood risk

5.17 The Environment Agency have raised specific concerns regarding the soundness of this policy as currently drafted. How do the Council intend to address these concerns?

5.18 With reference to the representations made by Thames Water concerning part F of the policy, should the text be amended to refer specifically to sewer flooding to ensure the policy is precise?

5.19 Is part G of the policy sufficiently precise to be effective?

Green Infrastructure

Strategic Policy 07 Green Infrastructure

5.20 Does part C of the policy duplicate national policy and the London Plan and if it does, is this a justified approach?

5.21 Is Part B of the policy positively prepared? Is there any conflict between parts D and E of the policy?

5.22 How will part F of the policy be assessed?

5.23 Is part J of the policy a justified approach?

5.24 The Environment Agency consider the Plan to be unsound due to the lack of a contamination/groundwater protection policy and also the lack of a robust flood risk policy. I note that the Council has suggested a number of potential amendment to the Plan to address these concerns. To what extent have the Council engaged with the EA on these changes? Please provide an agreed SoCG on the matters raised or alternately written confirmation from the EA that the suggestions put forward address the concerns they have raised.

Policy G11: Green Belt and Metropolitan Open Land

5.25 In relation to policy G11 concerning the Green Belt and Metropolitan Open Land, in what way is part A (b) of the policy which refers to the effect on openness of development adjacent to Green Belt consistent with paragraph 142 of the Framework?

5.26 In what way are parts C, D and E of the policy consistent with the Framework?

5.27 Is part F of the policy positively worded?

5.28 Parts 7.1.7 and 7.1.8 of the supporting text refer to two strategic Green Belt opportunities for redevelopment within the Borough at the Royal National Orthopaedic Hospital (RNOH) and Harrow College. What is the purpose of referencing them within the supporting text and is this an effective approach?

5.29 In relation to the RNOH, the Plan states that this planning permission has now lapsed. How has the site selection process addressed these two sites as well as the additional allocation for gypsy and traveller provision at Watling Farm which are all within the Green Belt when the Site Selection methodology advises that Green Belt and MOL are listed as a site exclusion criteria? Is the approach adopted within the Plan positively prepared and justified?

5.30 CSD02a refers to a number of changes, including MOL01 which refers to an amendment to the MOL boundary. The Framework is clear that Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case changes should be made only through the Plan making process. The Framework goes on to note that Strategic Policies should establish the need for any changes to the Green Belt boundaries. Where is the evidence to support the approach being adopted within the Plan and is the approach justified?

Policy G12: Open Space

5.31 Is the wording of this policy consistent with the Framework, the London Plan and policy C13, particularly in relation to sports pitch provision?

5.32 Is the evidence base which supports this policy up to date?

5.33 Are the concerns expressed by Sport England regarding the drafting of this policy and its consistency with the Framework valid?

Policy G13: Biodiversity

5.34 Policy G13 relates to Biodiversity and part G of the policy seeks to achieve a number of measures including minimum net uplift of 15% biodiversity unit value.

5.35 The requirement for a 10% biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). The Planning Practice Guidance (PPG) advises that Plan-makers should be aware of the statutory framework for biodiversity net gain, but they do not need to include policies which duplicate the detailed provisions of this statutory framework. It will also be inappropriate for plans or supplementary planning documents to include policies or guidance which are incompatible with this framework, for instance by applying biodiversity net gain to exempt categories of development or encouraging the use of a different biodiversity metric or biodiversity gain hierarchy.

5.36 How does the policy as drafted take account of the exempt categories of development? Is this approach justified and effective?

5.37 The PPG also states that Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development.

5.38 Where is the evidence base to support this approach and in particular the need for a higher percentage? The evidence base includes EBBCO1 Harrow Biodiversity Net Gain Working Paper (November 2024) which is marked as a draft document, has this evidence base been finalised?

5.39 To what extent has the viability work undertaken take into account the 15% minimum net uplift and does this evidence demonstrate that the 15% is deliverable?

Strategic policy 08 – Responding to the Climate and Nature Emergency

5.40 Are the suggested changes put forward concerning groundwater and land quality issues necessary for soundness?

Policy CN1: Sustainable Design and Retrofitting

5.41 Do the criteria within the policy present a justified and effective approach and is the approach, which seeks to set local energy efficiency standards, consistent with national policy?

5.42 In what way does the viability evidence support the approach being adopted? Within document CSD05, the Council have noted that viability may be impacted by the policy but does not identify any overarching issues with this policy requirement. The Plan identifies that the policy may result in some reductions in affordable housing delivery. With reference to tables 6.28.1 and 6.28.2 of the Viability evidence, can the

Council please explain how these statements are correct? If the Council consider these statements are correct, please could the Council provide evidence from the viability evidence to support this statement and identify what the impact on affordable housing delivery would be?

5.43 What is the evidence which the Council are relying upon to support the application of this policy and the specific circumstances applicable to the Borough which support the policy as currently drafted?

5.44 In what way does the evidence base, EBBC04 support parts D-H of the policy wording as drafted concerning the retrofit of existing buildings?

5.45 With reference to the policy requirement for carbon offsetting, the viability evidence recommends that the emerging policy should incentivise carbon reduction through on site solutions. In what way does the policy as currently drafted do this?

Policy CN2: Energy Infrastructure

5.46 With reference to part A of the policy, what is meant by a local energy masterplan and is it clear how development proposals should respond to this requirement?

5.47 Is part B of the policy, which repeats the requirements of the relevant London Plan policies, a justified an effective part of the policy?

Policy CN3: Reducing Flood Risk

5.48 Does the policy wording accord with the Framework?

5.49 Are parts F and G justified and do they present an effective approach?

5.50 Does the requirement for the installation of resilience measures within basements as set out at part F of the policy need to be viability tested? If not why not?

Policy CN5: Waterway Management

5.51 Are the buffer zones identified at part B of the policy justified by the evidence base?

5.52 Is part D of the policy which refers to a relevant financial contribution towards other relevant projects for the enhancement or decluttering of other sections of the river or watercourse supported by the evidence base?

5.53 Why have the policy requirements set out at D and E concerning securing improvements to the enhancement or deculverting of other sections of the river or watercourse not been tested through the viability word undertaken?

5.54 How will part E of the policy be assessed? Is it clear how a decision maker should respond?

Strategic Policy 09: Managing Waste and Supporting the Circular Economy

5.55 How will the requirements of part A (c) of the policy be applied to an outline planning application? Does the policy present a justified approach?

Policy CE1: Reducing and Managing Waste

5.56 Concerns have been raised regarding the level of detail contained within the policy which contains 16 sub sections. Does this present a justified and effective policy approach?

5.57 Part C of the policy refers to the guidance contained within the Council's waste management standards – what are these and do they form part of the evidence base?

5.58 Paragraph 9.1.6 of the supporting text refers to waste management guidance set out within the NPPF -what guidance is this text referring to?

Policy CE2: Design to support the Circular Economy

5.59 This policy appears to duplicate policies already contained within the Plan, namely CE1B, GR1B(d), Strategic Policy 8 (e) (g). Does this present an effective approach?

Matter 5 Meeting the Boroughs Housing Needs

Issue 6: Whether the Plan has been positively prepared and whether the approach to addressing housing needs is justified, effective and consistent with national policy

Questions:

Strategic Policy 03: Meeting Harrow's Housing needs³

6.1 The Plan states that the housing need for the Plan period (2021-2041) is 16,040 homes. This figure is based on the London Plan target as identified for the first 10 years of the Plan, with a London Plan target of 802 dwellings per year being rolled over into the last 10 years of the Plan. A number of representations have raised concerns that this does not represent a sound approach. Are these concerns valid and is this approach justified?

6.2 Is the mix of housing identified at part 5 of the policy justified and supported by robust evidence?

6.3 How will the policy ensure that the Plan delivers the right homes for the right people, as envisaged by the Framework?

6.4 Part 5 C of the Plan refers to the delivery of a minimum of 980 units of specialist older person accommodation across the period 2022-2032. How has this figure been arrived at and what will the need be for the remainder of the plan period? Should this figure be expressed within the policy wording?

6.5 What are the corresponding allocations which will deliver these 980 units?

³ Affordable housing needs outside of Strategic policy 03 are dealt with under Matter 5 below

Issue 7: Is the approach to small sites and the contribution that these can make to supply justified and consistent with the London Plan?

Questions:

7.1 Part 3C of Strategic Policy 3 states that a minimum of 4125 new homes will be delivered on small sites.

7.2 The Plan indicates that the approach to the windfall allowance comes from the London Plan and the small site target of 375dpa as set out at paragraph 4.2.3. Reference is also made to the Small Site Capacity Study dated 2022 (EBH05) which includes data up to 2019. Is there any more up to date evidence since 2019 on small site delivery within the Borough? Is this figure based on up to date evidence and does the evidence base demonstrate that this will form a reliable source of supply?

7.3 A number of concerns have been raised regarding the approach to the windfall allowance and whether this presents justified and effective approach. Are these concerns valid?

7.4 Are the criteria contained within the policy justified and effective? For example, part 6 of the policy addresses Estate Regeneration and repeats a number of the criteria already covered by Strategic Policy 01, Policy GR1 concerning High Quality Growth and Achieving a High Standard of Development and Policy GR2 concerning Inclusive Neighbourhoods.

Issue 8: Whether the approach towards the delivery of housing land is justified, effective, positively prepared and consistent with national policy as well as the London Plan

Questions:

8.1 With reference to the housing trajectory provided at page 294 of the plan, please could the Council set out clearly which sites contribute to the 'outside opportunity area' column for years 1-5 (466 units) years 6-10 (1211 units) and years 11-15 (231 units).

8.2 In what way does the Plan contain a sufficient range and choice of sites in terms of their location, type and size to provide flexibility to meet the boroughs housing requirement during the Plan period?

8.3 Has the Council provided sufficient evidence to demonstrate that the Plan will provide a sufficient supply of deliverable sites (years 1 to 5) and then developable sites beyond this period (years 6 to 15) to demonstrate that the Plans housing requirement will be met?

8.4 Will the Plan provide a five year supply of specific deliverable sites upon adoption? The Council are requested to identify the sites they are relying upon for this, and provide clear evidence that the sites identified under 'permissions or legal agreements', as well as the allocations, will be completed.

8.5 The Plan places a great reliance upon delivery through the Opportunity Area. Is the expected contribution to housing land supply from the Opportunity Area realistic and are there any concerns that the Opportunity Area may not deliver at the rates expected?

8.6 What sources of information have informed the build our rates and delivery information contained within the housing trajectory? Are these figures realistic and up to date?

Matter 5: Affordable housing and other housing matters

Issue 9: Whether the approach to affordable housing is justified, positively prepared, consistent with national policy and in general conformity with the London Plan

Questions:

Policy H04 – Affordable housing

9.1 EBH02 identifies the affordable housing need for the borough as 2,729 households needing affordable housing over the 20-year period 2021-41, or a rate of 136 per annum. Will the plan deliver sufficient affordable housing to meet this identified needs and should this need be reflected within the policy wording?

9.2 Is the approach to affordable housing as identified at policy H04 consistent with London Plan Policy H4?

9.3 Is the tenure mix identified at part G of the policy justified and supported by the evidence base?

9.4 Is the policy justified by prioritising the delivery of social rented housing over other affordable products as set out at part H of the policy?

9.5 Part H (d) refers to evidence of ‘meaningful discussions with Registered Providers’. How will this be assessed and is this wording clear to a decision maker?

9.6 Is Part N of the policy and the approach taken towards Vacant Building Credit in the Plan consistent with national policy ?

9.7 Should the policy apply a more flexible approach to the provision of affordable housing in relation to older persons development?

Issue 10: Whether the approach to other housing matters is positively prepared, justified, consistent with national policy and in general conformity with the London Plan

Questions:

Policy H01: Dwelling size mix

10.1 Does the requirement for a minimum of 25% of all units to be family sized dwellings (three bedrooms or more) accord with the evidence base or should this be higher?

10.2 Is the policy as drafted sufficiently flexible and does it present a justified and effective approach?

Policy H06: Accommodation for Older People

10.3 What is the justification set out at part 1 (a) of the policy that proposals should demonstrate that it would meet an identified local need?

10.4 Are all the policy requirements set out at part 3 of the policy justified?

Policy H09: Large Scale Purpose built and conversions for shared living

10.5 Is part A (c) of the policy flexible enough or should it also include Harrow's designated town centres and areas with a high PTAL rating?

10.6 Is the policy as currently drafted justified by the evidence base? In particular, where is the evidence to support the approach adopted within parts (b) and (d) of the policy?

10.7 Does the policy overall present a sufficiently flexible approach?

10.8 Do parts of the policy (e and i) repeat other policies contained within the Plan?

Policy GR10: Infill and backland sites, back gardens and amenity areas

10.9 What is meant by part f of the policy? How will this be assessed?

10.10 Is part g of the policy justified?

10.11 What is meant by part A (b) of the policy and the cross reference to Strategic Policy 3 ? Does the policy need to be more specific regarding which part of Strategic Policy 3 is being referred to?

Issue 11: Whether the approach to meeting the needs of Gypsies and Travellers is justified, positively prepared, consistent with national Policy and in general conformity with the London Plan

Questions

11.1 As drafted, part 1 of policy HO12 identifies the need for 12 additional pitches for future traveller needs to 2032. What is the established need for Gypsy and Traveller Accommodation over the plan period?

11.2 The Plan states that the existing Gypsy and Traveller site at Watling Farm will be used to address needs to 2032. In what way does policy H012 seek to address Gypsy and Traveller Needs for the Plan period?

11.3 The Council have indicated that the GLA London Gypsy and Traveller Accommodation Needs Assessment (GTANA) will be published in Spring 2025. What is the exact timeframe for the publication of this document and what are the implications, if any, for the drafting of policy HO12?

11.4 As currently drafted, does the Plan meet the requirements of the PPTS by identifying a supply of land to meet needs and/or setting out a criteria based approach to assessing any applications which may come forward?

11.5 Are the criteria set out at part 3 (a-g) of the policy justified and positively prepared?

11.6 Does the policy as drafted adequately address the concerns raised by Historic England regarding the effect of any proposals on the significance of the nearby Watling Farm listed building and its setting? Please note additional questions have been raised regarding the proposed allocation of site GB2 which is within the Green Belt and these are set out under a separate matter.

11.8 Part E of the PPTS advises the Green Belt boundaries should be altered only through exceptional circumstances. The text goes on to note at paragraph 17 that if a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan-making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only. In light of what the Council are proposing regarding site GB2, should the exceptional circumstances for altering the Green Belt boundary be established through this Plan?

11.9 If this is the case, what do the Council consider the exceptional circumstances to be for altering the Green Belt boundary to meet the needs of Gypsies and Travellers over the Plan period?

Matter 6: Site Allocations including the Harrow and Wealdstone Opportunity Area Strategy

Issue 12: Whether the proposed site allocations within the Plan are positively prepared, justified, effective and consistent with national policy and in general conformity with the London Plan

Questions:

Strategic Policy 05: Harrow & Wealdstone Opportunity Area

12.1 In what way does the policy wording recognise the interface between the opportunity area and the surrounding lower rise areas?

12.2 Is the policy sufficiently flexible in terms of focusing higher density development to other sustainable locations outside of the Harrow & Wealdstone Opportunity Area?

12.3 Part A (b) of the policy refers to supporting the delivery of a minimum of 1000 jobs within the opportunity area, as well as supporting employment floorspace to meet the evidenced needs of the Borough. Is the policy sufficiently precise regarding what these needs are? Is the policy clear as to how the delivery of 1000 jobs identified will be addressed and should the policy be more precise in this regard? In what way does the policy as drafted accord with the Framework concerning strategic policies?

12.4 Parts D, G and H of the policy address the Harrow Metropolitan Town Centre, Station Road and Wealdstone District Centre respectively. A number of representatives

have raised concerns regarding the designation of the Station Road area within this policy. Are these concerns justified?

12.5 Is the approach to the Harrow and Wealdstone Opportunity Area consistent with the London Plan? Concerns have been expressed regarding the capacity of the area to accommodate the growth expected through this Plan period, as well as the impact on the surrounding neighbouring areas. The London Plan identified that the HWOA will accommodate growth for at least 5000 homes and 1000 jobs. Paragraph 2.1.1 advises that when developing policies for development plans, boroughs should use the indicative capacity figures as a starting point, to be tested through the assessment process.

12.6 Where in the evidence base is the capacity assessment undertaken to support the figures set out within the policy. Is the policy justified?

12.7 Is the area as defined within the Plan the same as the London Plan? If not why not?

12.8 Could the Council set out (in a table from) the quantum of growth already accommodated within the area?

All site allocations:

The following questions relate to all of the site allocations as identified at chapter 11 of the plan. The Council should provide a full response for each allocation, and I suggest a table format is used to provide a response for each allocation referred to :

12.9

- Are the site allocations correctly drawn and are the boundaries justified?
- What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?
- In what way does the allocation identify the infrastructure requirements necessary, together with the timing for any necessary infrastructure?
- Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? Should these figures be identified as minimum capacity figures?
- In terms of the identified uses and policy considerations, are these based on sound evidence?

12.10 Have all the concerns raised by Historic England and the Ministry of Defence been adequately addressed? The Council should set out a table confirming their response to each of the individual points raised.

12.11 Thames Water have provided detailed commentary in relation to a number of the site allocations proposed. In what way has the Council sought to engage with Thames Water in relation to the comments raised ?

12.12 On the sites where Thames Water have identified that there are concerns regarding the capacity of the water network to accommodate the growth envisaged, are

these concerns valid and should there be reflected within the policy wording as well as the IDP?

12.13 The Council have specified within CSD05 that site allocation capacities have been informed by design-led capacity studies. This is set out at EBH01 which identifies at paragraph 4.24 that where design led capacities have been used, a further 10% uplift has been applied. The justification for this is set out at appendix A. Given that the text recognises that the previous capacity approach was based on a density matrix approach, is the 10% uplift justified? Have the Council taken into account the representation made by CPR regarding tree planting and woodland creation in relation to sites HRW001 – HRW005? If not why not?

The following questions are specific to each of the individual allocations as referenced below:

Site GB1

12.14 This is an existing hospital site within the Green Belt. As currently drafted, it is not clear to me how the allocation accurately reflects the guidance contained within the Framework concerning inappropriate development within the Green Belt. The Plan does not propose the release of the site from the Green Belt, and no exceptional circumstances have been put forward. Are these statements correct?

12.15 If they are correct, how is the allocation of the site for the uses identified (Hospital/Research and Innovation/Residential) justified and positively prepared?

12.16 The relevant planning application summary is unclear – with reference to planning application P/3191/12 the text states that some parts of this scheme relating to the hospital have been implemented, but overall the permission has lapsed. What does the Council mean by this statement?

Sites OA2/OA5/OA6/OA9/OA11/OA12/OA14/OA15/O1/03/06/07/013/020/021/022/OA6

12.17 The policy in relation to the above sites specifies that any new development will have to bring forward an appropriate level of parking – but how has this been factored into the capacity work undertaken? is the policy sufficiently clear in this regard?

12.18 How many car parking spaces will be lost as a result of the site allocation?

12.19 A number of the sites which the Council are identifying as site allocations are existing car parks, some of which are connected to public transport nodes. I also note that a number of station car parks are included and from an initial view as well as those expressed by the Regulation 19 representations, many appear to be well used facilities. I also note⁴ that Harrow has a significantly higher rate of car ownership (75.2%) compared to the London average (57.9%) reflecting the significantly higher rates of car use and distance travelled to get to work compared with the London average.

⁴ Pages 17 and 18 of the Plan

Please could the Council advise on the following:

- Total number of car parking spaces to be lost through the plan period;
- Have the Council completed any surveys of existing use and capacity of the existing car park(s)? Are the results of these surveys available?
- Have the Council considered any implications of the removal of the car park for the allocated centre/transport node (where relevant)
- Where no replacement car parking is proposed at Station Car Parks, for example allocation 07 Raynes Lane Station Car park, what are the implications for this strategy in terms of existing parking at the site and the existing users of the car park?
- In what way will the Council ensure that policy M2 (H) is addressed as part of any development proposals and should the site allocations (where applicable) include a cross reference to this policy for effectiveness?

12.20 There also appears to be a variance of approach in terms of referencing replacement car parking on some but not all of the sites. What evidence has been used to inform the approach taken? Where allocations refer to replacement of sufficient car parking is it clear what this would mean in practice?

OA4 Havelock Place

12.21 Some of the site allocations refer to a number of delivery timeframes, however the above site refers to the whole plan period. What does the policy mean by this?

OA8 Former Royal Mail Postal Delivery Office, Elmgrove Road

12.22 Given the fact that planning permission has been refused previously for residential development on this site, is the site developable? The allocation refers to industrial co location – is this description specific enough?

OA11 Car Park Ellen Webb Drive

12.23 Given the sites location and proximity to the railway line, is it realistic to assume that appropriate residential amenity can be provided for the future occupiers of the development? What evidence does the Council have to support this position?

12.24 Are the identified land uses justified?

O14 Vernon Lodge

12.25 Does the allocation of this site need to justify the loss of the existing use under policy HO10? Is the site developable?

12.26 Are the identified building heights appropriate and are they supported by the evidence base?

OA13 Travis Perkins Wealdstone

12.27 What is the justification for the reference to use of a Compulsory Purchase Order in relation to this site?

12.28 Has the Council had regard to the representations made by the Environment Agency in drafting the policy wording and are the concerns raised valid?

017 Kenton Road Telephone Exchange

12.29 Has the Council had regard to the representations made by the Environment Agency in drafting the policy wording and are the concerns raised valid?

OA16 Kodak

12.30 If the site is under redevelopment should it form an allocation – does the site contribute to the existing pipeline of sites?

12.31 Is the amount of housing identified to be delivered justified by the evidence base and does this figure reflect what is contained within the trajectory?

12.32 Is the requirement for NHS floorspace to be provided on the site justified by the evidence base?

12.33 Has the Council had regard to the representations made by the Environment Agency in drafting the policy wording and are the concerns raised valid?

OA17 Former Kodak Administration offices

12.34 Is the SIL designation correct in relation to this site allocation justified?

018 Wolstenholme

12.35 What is the status and use of the current site? Is the site developable?

019 Marsh Lane Gas Holders

12.36 In light of the representations received, is this site allocation justified and effective? Is it developable?

12.37 Will it be developable for the uses envisaged and have all the known site constraints, including the easement zones been taken into account?

09 Pinner Telephone Exchange

12.38 Has the Council had regard to the representations made by the Environment Agency in drafting the policy wording and are the concerns raised valid?

016 Travellers Rest, Kenton Road

12.39 Representations from the landowner would suggest that this site allocation is not reflective of the current use of the site, and the site is not available for the uses envisaged by the site allocation. Is the policy as currently drafted effective?

12.40 Has the Council had regard to the representations made by the Environment Agency in drafting the policy wording and are the concerns raised valid?

Matter 7 Design and the Historic Environment

Issue 13 : Is the approach to Design and the Historic Environment contained within the Plan justified, positively prepared, consistent with national policy and in general conformity with the London Plan?

Questions:

Strategic Policy 01 – High Quality Growth

There are no direct questions raised regarding this policy however the responses below may well lead to further MIQ being issued before the hearings

GR1: Achieving a high standard of design

13.1 Part B of the policy sets out a 9 part criteria to ensuring the most efficient and optimal use of land. Is it clear that all of the criteria listed (a-i) are matters which are relevant to achieve the most efficient and optimal use of land? In what way will responding to local context in terms of building, height and mass (part a) achieve this policy objective?

13.2 Are parts D and E of the policy necessary? Is it an effective policy to refer to forthcoming guidance which does not form part of the evidence base?

13.3 In what way will part F of the policy be effective?

13.4 There appears to be a great deal of repetition between policy GR2 and GR3A as well as the associated supporting text. What is the justification for this approach and will the policies be effective as a result?

GR2: Inclusive Neighbourhoods

13.5 What is meant by the reference to ‘with dignity’ at part A (b) of the policy and how will this be assessed?

13.6 Is part B of the policy which expects development proposals to create inclusive neighbourhoods beyond site boundaries a justified and effective approach?

13.7 What is meant by a ‘lifetime neighbourhood’ as set out at Part D of the policy? Given the individual policies concerning heritage assets, is part D of the policy necessary for effectiveness?

GR3 Public Realm and Connecting Places

13.8 Is part E of the policy, which is specific to the preparation of a masterplan for Harrow Town Centre a justified and effective part of the policy?

GR3B Safety, Security and Resilience to Hazards

13.9 The supporting text notes that Harrow is one of the safest boroughs. Nevertheless, the policy sets out an 11 part policy concerning the matter. Furthermore, part C of the policy merely repeats Part B of the Building Regulations. What is the justification for this

approach? It appears that the policy duplicates much of what is contained within policies GR3 A (b) (d) , GR3A (D) as well as supporting text 2.3.18 – 2.3.23.

GR4 Building Heights

13.10 This policy defines a tall buildings zone within the Harrow & Wealdstone Opportunity Area. The evidence base to support this approach is EBDH03 Harrow Characterisation and Tall Buildings Study, 2021.

13.11 Does policy GR4 which addresses tall buildings align with the steps identified within the London Plan at page142/143?

13.12 What is the purpose of the designated tall buildings zones map on page 57 of the Plan and the associated text ? Does this replicate what is contained on the policies map?

13.13 The map purports to identify the areas appropriate for tall buildings. However, the text which accompanies the map indicates some but, not all, buildings could be tall in these areas. It goes on to state that only a minority should reach the maximum appropriate height. Please could the Council explain the rationale behind this text and how it relates to policy D9 of the London Plan which seeks to ensure that Boroughs identify appropriate locations for tall buildings.

13.14 Is it clear how a decision maker should react to the designations proposed and the policy wording?

13.15 Please could the Council check how the tall building heights are identified on the policies map – Historic England have raised concerns that appropriate tall building heights should be specified for each site. The Council have stated that this information is available on the map accompanying GR4 building heights and is shown on the policies map. On the hard copy printed map provided, these are shown as ‘up to’ 8/12/15/18 storeys in height. What is the justification for the approach adopted and is this supported by the evidence base?

13.16 Is part F of the policy justified?

13.17 Paragraph 2.4.8 – 2.4.12 appear to duplicate the policy considerations at part E of the policy. Is this text as currently drafted effective?

13.18 The policy purports to address building heights however primarily deals with locations where tall buildings would be appropriate. Should the policy be renamed to focus on tall buildings only, or should the policy wording be expanded to provide a policy framework for building heights outside of tall building zones? The supporting text at paragraph 2.4.6 and 2.4.7 references this point but is insufficiently clear as currently drafted.

GR4A Basement Development

13.19 Is the policy as drafted justified and effective?

GR5 – View Management

13.20 Is part G of the policy clear regarding opportunities to create local views?

13.21 Is this reference at part E specific to the protected views identified at appendix 3 of the Plan?

13.22 In what way does the policy accord with policy HC4 (London Views Management Framework) of the London plan?

13.23 In more general terms, is the policy wording as drafted effective or does it repeat the requirements of policy HC4 outlined above?

13.24 Representors have raised concerns that the policy wording as drafted goes beyond the scope of policy HC4 and seeks to impose a duty to positively enhance views. Are these concerns justified?

Policy GR6: Areas of Special Character

13.25 How do the Council understand the relationship between policy GR1 and GR6? Given the level of detail contained within policy GR1 is GR6 merely duplicating these requirements?

13.26 Where is the evidence base to support the designation of an area of special character? There is no assessment provided to support such a designation within the evidence base submitted including EBDH03 the Characterisation and Tall Buildings Study. Has the policy as drafted been positively prepared?

13.27 How does the Area of Special Character differ from a Conservation Area designation?

13.28 Are any of the areas of special character also covered by Conservation Areas? The Council is requested to produce an overall map extract which demonstrates any areas of duplication.

13.29 In what way is the criteria identified at parts A and C of the policy consistent with National Policy?

13.30 In what way is the proposed designation consistent with the London Plan?

Other Matters

13.31 Policies GR7, GR8 and GR9 deal with external lighting, shopfront and forecourts and outdoor advertisements, digital displays and hoardings respectively. The policies are lengthy, with policy GR8 having a 15 part policy and GR9 13 parts. Is it an effective approach to have all of these matters covered by individual policies? What do the individual policies add beyond policy GR1: Achieving a high standard of design?

13.32 Within policy GR9, what is the justification for part A (e) and the requirement for proposals to contribute to the safety of the environment for pedestrians, cyclists and drivers? How will this be assessed?

Policy HE1: the Historic Environment

13.33 Is the paragraph relating to Conservation Areas as set out at part D of the policy consistent with the duty identified at Section 72 of the Planning (Listed buildings and Conservation Areas) Act 1990 which refers to paying special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.

13.34 Is the policy as drafted consistent with national policy, particularly in relation to the reference to sustainable development within part A of the policy?

13.35 Is part H of the policy effective?

Matter 8 Employment, Retail and Town Centre Matters

Issue 14: Is the approach to the provision for the employment and retail needs of the borough are justified, positively prepared and in general conformity with the London Plan

Questions

Strategic Policy 04: Local Economy

14.01 The Plan appears to rely on the protection of existing employment floorspace rather than the allocation of new floorspace to meet needs over the Plan period. Is this correct? If this is correct, is this a justified approach?

14.02 What are the employment needs for the Plan period in floorspace terms? Should these needs, some of which appear to be identified at paragraph 5.0.6, be reflected within Strategic Policy 04 Parts A and C to reflect the requirements of paragraph 20 of the Framework? As currently, drafted, the policy refers to ensuring 'sufficient employment floorspace is provided'. How will this policy wording ensure the policy is effective?

14.03 Strategic Policy 04 B (c) sets out that the Council will support proposals that demonstrably contribute to the vitality and viability of the local economy by assisting in meeting the evidenced floorspace needs for the borough across the plan period. Paragraph 5.0.6 of the supporting text appears to identify the combined retail, food/beverage, leisure and entertainment needs as 13,900sqm of floorspace.

14.04 Are these needs precise enough or should they specify the convenience and comparison goods floorspace requirements separately? If not why not?

14.05 Should the policy reflect these requirements in accordance with paragraph 20 of the Framework?

14.06 Paragraph 90 (a) refers to allowing for a suitable mix of uses within town centres, including residential. Is the policy as drafted sufficiently flexible in this regard and should it be amended to ensure it is effective?

Policy LE1: Development Principles and Town Centre Hierarchy

14.07 Paragraph 90 (a) of the Framework refers to allowing for a suitable mix of uses within town centres, including residential. Part C of the policy as drafted states that residential uses on the ground floor on any town centre of neighbourhood parades will not be supported. In what way does this accord with the above guidance and is the policy as well as paragraph 5.1.14 positively prepared as a result?

14.08 How will part A (c) and the reference to Sui Generis uses be measured?

14.09 Is Part G of the policy a justified approach?

14.10 What is meant by part F of the policy and is 'essential day to day amenities' suitably defined within the Plan?

14.11 In what way does part H of the policy which applies a sequential test to the release of office floorspace accord with the Framework?

14.12 What is the purpose of part H.1 of the policy – is this to be read as a continuation of part H of the policy? Is the wording of the part of the policy effective?

Policy LE2 – Night Time & Evening Economy

14.13 What is the justification for part A (b) and B (c) of the policy and is this approach justified for a Metropolitan town centre location as well as locations outside of the Metropolitan Town Centre?

14.14 Is part E of the policy positively prepared?

Policy LE3: Industrial Land

14.15 Part A of the policy deals with Strategic Industrial Locations (SIL) as defined within Policy E5 of the London Plan. In what way does part b of the policy accord with parts B (2 and 3) of this policy?

14.16 The same question above is raised in relation to part B of the policy which deals with Locally Significant Industrial Sites (LSIS) and policy E6 of the London Plan?

14.17 Is the policy as drafted sufficiently flexible towards supporting new development within SIL locations?

Policy LE4: Culture and Creative Industries

14.18 What is the justification for the requirement set out in part B (a) of the policy to demonstrate need in relation to culture and creative industries?

14.19 Is it clear how Part C (a) will be assessed and is the policy clear how a decision maker should respond?

Policy LE5: Tourism and Visitor Accommodation

14.20 In what way does part A of the policy accord with the Framework and in particular the reference to highly sustainable locations?

14.21 Is part C of the policy as currently drafted effective? How will parts a and b of the policy be assessed? Is the working at part c effective? Should the policy wording permit the replacement of alternative tourism and visitor accommodation within the borough?

14.22 What is the justification for part E of the policy and why is this requirement necessary in relation to tourism and visitor accommodation but not other uses identified within the Plan? Is this policy requirement consistent with the London Plan?

Matter 9 Transport and Movement

Issue 15: Whether the approach to transport and movement is justified, positively prepared, consistent with national policy and in general conformity with the London Plan

Questions

Strategic Policy 10: Movement

15.1 This policy identifies, amongst other things, that public and active transport travel networks will be enhanced to become more attractive alternative to private vehicles. In what way will the Plan achieve this objective and which non strategic policies will achieve this objective? Is the Plan and its policies sufficiently effective in this regard?

15.2 Is Strategic Policy 10 as drafted positively prepared and effective? As drafted, are parts A, B and E clearly written and unambiguous? Is it clear how a decision maker should react to development proposals?

15.3 Is it a justified approach for part A of the policy to require all development proposals to facilitate improvements to transport infrastructure and how would this be applied to householder planning applications? Should this part of the policy apply to major development proposals only?

15.4 The transport strategic objective (page 23 of the Plan) notes that sustainable transport infrastructure will be delivered to ensure there are healthy and safe alternatives to the private vehicles, and the Council will facilitate modal shift away from fossil fuel car use. Which policies will secure these objectives and in what way?

15.5 If the Council is facilitating a modal shift away from fossil fuel car use, what does this mean for parking provision in relation to electric cars? How does the Plan seek to address these parking requirements?

Policy M1: Sustainable Transport

15.6 With reference to the representations from Transport for London (TfL) could the Council identify on an annotated map the existing and proposed walking, cycling and public transport improvements referred to at part B of policy M1 and paragraph 10.1.4 of the supporting text

15.7 Is part A of the policy justified and is it consistent with the London Plan? Is this part of the policy sufficiently clear and what do the Council mean by a sustainable neighbourhood? Should this be defined within the glossary?

15.8 Is part C of the policy sufficiently clear and justified and is it consistent with the London Plan?

15.9 Transport for London (TfL) have concerns that the Plan should be more specific concerning the safeguarding of land for new transport projects to ensure the plan is consistent with policy T3 of the London Plan. Are these changes necessary to ensure the policy is effective?

15.10 In what way does policy M1 support development that will improve access to public transport?

Policy M2 Parking

I note a significant number of representations made at the Regulation 19 stage of the Plan refer to consultation regarding changes to a Controlled Parking Zone. This does not form part of this Plan and as a result, the questions below focus on the representations made in relation to the policy as currently drafted.

15.11 Should the text at paragraph 10.2.2 be incorporated within the policy for effectiveness?

15.12 Are parts B and H of the policy as drafted effective?

Matter 10 Monitoring & Delivery

Issue 16 – Whether the Plan identifies a suitable framework for the monitoring and implementation of the policies contained within the Plan?

Questions

16.1 How have the key monitoring indicators been defined and how do these related to the overall strategy of the Plan?

16.2 With regards to KPI7 – public transport accessibility, could the Council explain how the monitoring target, which acknowledges that an alternative baseline target may be used, presents a justified and effective monitoring indicator?

16.3 In relation to the additional indicators at page 400 of the plan onwards, a number of the indicators do not have targets – how will these be effective?

16.4 Overall, is the plans approach to monitoring effective?

ⁱ NB - A number of queries have been raised regarding the site allocations and the use of existing car parks within the Borough. These MIQ have been raised under matter 6 below.