

**Statement of Common Ground**

**between**

**The London Borough of Harrow**

**and**

**The Greater London Authority**

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

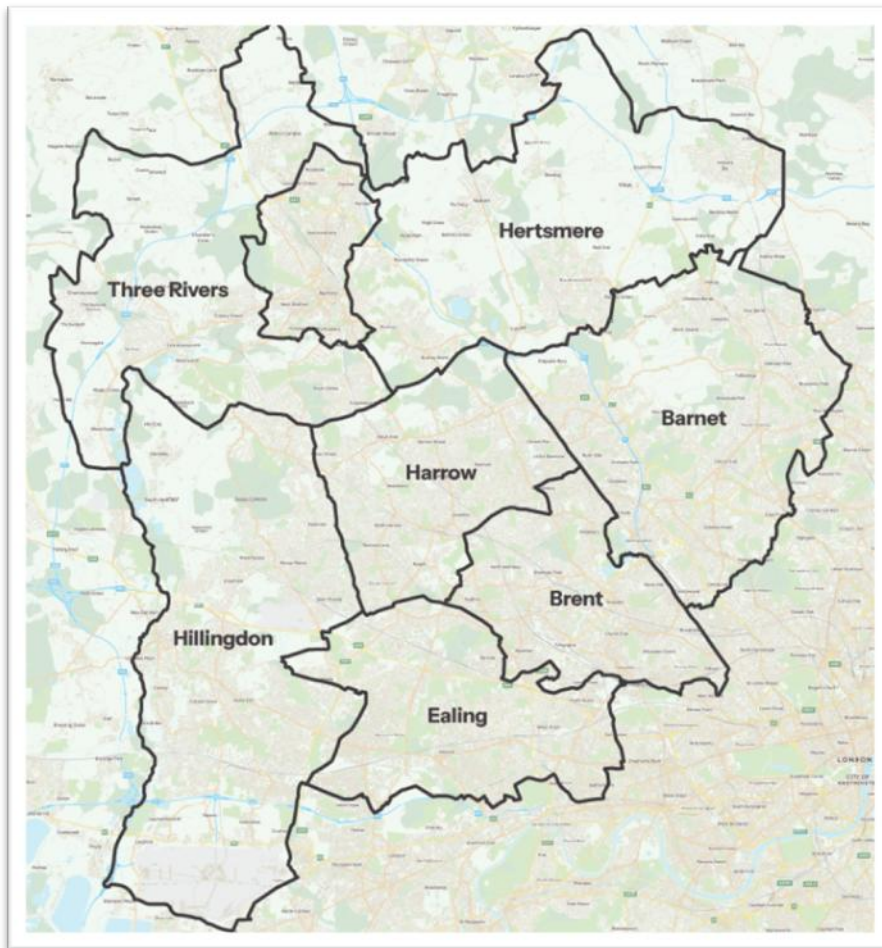
**May 2025**

## 1. Introduction

1.1 This Statement of Common Ground has been prepared by The London Borough of Harrow (“LBH”) and the Greater London Authority (“GLA”) hereafter referred to as “the parties”. It sets out matters that are agreed 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. Borough 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 and the Hertfordshire districts of Three Rivers and Hertsmere 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%).

2.4 Housing density across the borough is relatively low. There are a significantly greater proportion of whole house or bungalow homes than the London average, which is reflective of a more suburban outer London Borough. There are significantly lower proportion of flats than the London average.

2.5 Transport for London's (TfL's) Public Transport Accessibility Level (PTAL) rating confirms that access to public transport is also relatively low. The majority of the borough has a PTAL rating of 1a, 1b and 2. Land surrounding and within identified District Centres generally has a PTAL rating of 3 and 4. The highest levels of access to public transport can be found in and around the metropolitan centre of Harrow, which has a PTAL rating of 6A.

2.6 Travel patterns across the borough are complex. A significant proportion of journeys are undertaken to and from destinations outside of the London boundary. PTAL ratings provide a useful indicator of access to public transport services, but do not necessarily reflect the destinations that residents or daily commuters wish to travel to.

2.7 Harrow has significantly higher rates of car ownership (75.2%) than the London average. There are also higher rates of car use to get to work and lower levels of bus and non-underground train usage as a method of transport to work.

### **3. The Emerging Local Plan**

3.1 LBH commenced the evidence gathering process for its new Local Plan in 2018 and its production has been on-going since this time. A document seeking views on the issues that the emerging Local Plan should cover was issued for consultation in February 2024. 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 submitted the Regulation 19 version of the plan for examination after full consideration of all representations received. The emerging Local Plan is intended to be examined against the December 2023 NPPF, as enabled by the 2024 NPPF transitional arrangements.

#### **4. The London Plan (March 2021)**

4.1 The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. The current London Plan was adopted by the Mayor of London in March 2021.

4.2 All Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004.

4.3 The London Plan should be read as a whole and the policies and priorities within the document have equal weight. Once adopted, policies in Harrow's Local Plan and the London Plan will form part of the development plan for Harrow alongside made neighbourhood plans and the West London Waste Plan. LBH is required to determine planning applications for new development in accordance with policies in the development plan, unless material considerations indicate otherwise.

#### **5. Key Strategic Matters**

5.1 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. This has included engagement on the various evidence base documents which underpin emerging policies.

5.2 The duty to cooperate activities between the parties are recorded in the Harrow Regulation 19 Duty to Cooperate Statement November 2024.

5.3 An updated version of the Duty to Cooperate Statement was published at the point of Submission.

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

- General conformity with the London Plan;
- Housing need and supply (including the provision of sites for Gypsies and Travellers);
- The supply of retail and employment land;
- The provision of infrastructure, including burial space; and
- Transport and Parking Provision.

#### ***General Conformity with the London Plan***

5.5 The Mayor of London wrote to the Council on 16<sup>th</sup> December 2024, stating that:

*'As currently drafted it is the Mayor's opinion that the draft Local Plan is in general conformity with the LP2021; although this letter provides some further guidance to bring the draft Plan into closer alignment with the LP2021.'*

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

5.6 The emerging Local Plan proposes to adopt a minimum housing requirement/target of 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.

5.7 The proposed 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.

5.8 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 proposes to deliver a minimum of 8,750 homes in the Harrow and Wealdstone Opportunity Area.

5.9 The Gypsy and Traveller Accommodation Needs Assessment (GTANA) for Greater London is yet to be published; the provisional figures cited in the emerging Local Plan reflect those available at the time. The conclusions of this work and final pitch requirements will inform further work on LBH's policies on Gypsy and Traveller pitch provision when they become available.

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

5.10 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

5.11 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.

5.12 The emerging Local Plan proposes to meet retail and employment floorspace requirements in full. Floorspace completions will be reported through the Council's annual monitoring process.

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

5.13 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.

5.14 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.

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

### ***Transport and Parking Provision***

5.16 The Mayor is supportive of the adoption of maximum car parking standards. Amendments to the wording of some policies is necessary to ensure the emerging Local Plan is fully consistent with LP 2021 parking policies. Transport and parking matters are addressed in a separate statement of common ground with TfL.

## **6. Areas of Agreement**

6.1 The areas of agreement between the Council and GLA in relation to the preparation of the emerging Local Plan are set out below. The Schedule of Comments made by the Mayor of London and the position reached by the parties is contained at Appendix 1.

- 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).
- Specific comments from The Mayor of London and the Council's response are highlighted at Appendix 1.
- The emerging Local Plan makes provision to fully meet identified development needs in the associated evidence base and the London Plan (2021), including the housing target for Harrow.
- Any additional homes provided in Harrow over and above this minimum target will contribute to London's wider housing need.
- The parties are satisfied that the requirements of the duty to cooperate have been met.

## 7. Governance Arrangements Including Future Review

7.1 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;
- Review and update this Statement of Common Ground in the light of any material change in circumstances; and
- Maintain positive principles of cooperation.

## 8. Signatories

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

8.2 It is agreed that these discussions have and will continue to inform the emerging Local Plan. The parties will continue to work together collaboratively and the parties are satisfied that the requirements of the duty to cooperate have been met.

	<b>On behalf of LBH</b>	<b>For the Greater London Authority on behalf of the Mayor of London</b>
Signed by		
Name	Viv Evans	Lisa Fairmaner
Position	Chief Planning Officer	Head of London Plan, Strategic Planning
Date	8 <sup>th</sup> May 2025	16 <sup>th</sup> May 2025

## Appendix 1 – Mayor of London’s Responses to LB Harrow Reg 19 Consultation & Proposed Modifications

**Table 1A: MoL representations with Proposed Modifications**

Policy	Comment from the Mayor or London	LBH Response
<p>Policy GR4: Building Heights</p>	<p>Policy GR4 defines tall buildings as 21m in height, or 7 storeys, as measured from the ground level to the highest point of the building (excluding necessary plant and roof infrastructure). This definition aligns with Policy D9A of the LP2021. LBH has identified one area that may be suitable for tall building development in the Harrow and Wealdstone OA and corresponding appropriate building heights are set out within this. This is illustrated in the Designated Tall Building Zones Map in the draft Plan. LBH’s approach to tall buildings is therefore consistent with the requirements of Part B of Policy D9 of LP2021.</p> <p>This map sets maximum appropriate heights for buildings in different zones. The term ‘appropriate’ building heights as set out within Policy D9 is preferred to ‘maximum height’.</p> <p>The Mayor advises that maximum heights for tall buildings should be used sparingly where there is a</p>	<p>Noted. References within the supporting text to ‘maximum appropriate’ heights are considered factual as they refer to the Harrow and Wealdstone Opportunity Area Tall Buildings Study, which uses that terminology. The policy itself does not refer to ‘maximum’. The map at the end of the policy has been included for reference (and refers to ‘maximum appropriate’ heights) but the policy itself refers to appropriate heights shown on the Policies Map (when produced).</p> <p><b>Proposed modifications:</b></p> <p>Amend the key on the map at the end of Policy GR4 Building Heights to as follows: ‘Maximum appropriate heights for tall buildings’.</p>

Policy	Comment from the Mayor or London	LBH Response
	<p>clear constraint on development above a certain height. For example, this could be an aviation threshold or due to the impact on a protected viewing corridor. In light of this, LBH should amend instances where the use of the term ‘maximum’ heights or similar is used throughout the draft Plan.</p> <p>There are two strategic views that intersect with the borough and these are illustrated in Appendix 3. This should be replaced with a much clearer image and included in the main</p> <p>text of the draft Plan, so that it is easy to determine if a site lies within a strategic viewing</p> <p>corridor or not which will aid decision making.</p>	
Strategic Policy 3: Meeting Housing Needs	<p>LBH’s housing target as set out in Table 4.1 the LP2021 is for the delivery of 8,020 new homes between 2019 and 2029 and the draft Plan sets out a clear commitment to meet that target. The draft Plan period starts in 2021, with LBH exceeding their housing target by 454 homes between 2019 and the start of the Plan period in 2021.</p> <p>LBH proposes to deliver a minimum of 16,040 net homes during the Plan period (2021/22- 2040/41). This equates to 802 per year on average over the Plan period. The intention to roll forward the housing target beyond the London Plan period is supported. It is</p>	<p>Support noted and welcomed</p> <p><b>Proposed modifications:</b></p> <p>Amend Para 4.3.7 as below:</p> <p>In addition, proposals will be required to consider any future local guidance that may be produced to increase the provision of well designed new homes on small sites, such as site specific design briefs, master plans and Design Codes in line with the London Plan Guidance (2023), to support well designed new homes on small sites</p>

Policy	Comment from the Mayor or London	LBH Response
	<p>noted that proposed changes to national policy are likely to mean a significant increase in London's overall housing need figure. The Mayor is in the process of preparing a new Strategic Housing and Land Availability Assessment (SHLAA) and London Plan which will apportion targets across boroughs. Recognition of this context would be a useful consideration when planning for housing beyond 2029 as well as the new NPPF and the mandatory housing requirement for London of 87,992 homes per year.</p> <p>LBH's small site's target is set out in Table 4.2 of the LP2021 to deliver 3,750 new homes a year up to 2029. This is reflected in the draft Plan which is noted and welcomed. In order to meet that target, LBH should explore all the mechanisms at their disposal to facilitate all sources of housing supply including from small housing site development. LBH is advised to follow the guidance set out in Policy H2B of the LP2021 by preparing site-specific briefs, masterplans and housing design codes for small sites. The Mayor has also published his Small Sites Design Codes LPG1 . Small sites should be considered as a valuable source of housing delivery and should be optimised to contribute towards meeting the borough's housing target. It is noted that LBH consulted on a draft Small Sites Design Code SPD in early 2022 and the Mayor encourages this to be developed and adopted.</p>	

Policy	Comment from the Mayor or London	LBH Response
Strategic Policy 7: Green Infrastructure	<p>Strategic Policy 07 and Policy G11 of the draft Plan is clear that Green Belt and Metropolitan Open Land (MOL) will be protected from inappropriate development which is consistent with LP2021 Policies G2 and G3 which is noted and welcomed.</p> <p>In the site allocations, two Green Belt sites have been identified for development. One of them is at Watling Farm and is for the 12 to 13 additional Gypsy and Traveller pitches required to meet identified need. The other site is the Royal National Orthopaedic Hospital (RNOH) and is allocated for the modernization and extension of the hospital as well as 500 new homes. Both sites are currently allocated in the adopted Local Plan and also have associated but lapsed planning permissions. As such, it is assumed that LBH may need to establish exceptional circumstances to justify the proposed developments in these allocations again.</p>	<p>Comments noted. Allocations should be clearer on the proposals for these sites. It appears that no further release of Green Belt land is proposed so Exceptional Circumstances will not apply.</p> <p>There appears to be no extant planning consent so allocations should recognise the very special circumstances will need to be demonstrated to justify inappropriate development.</p> <p><b>Proposed modifications:</b></p> <p>Note that that proposals for inappropriate development on these sites will need to demonstrate very special circumstances.</p>
Allocation OA17: Former Kodak Administration Offices	<p>Site allocation (OA17- Former Kodak Administration Offices) is located within SIL (0.47ha) and has been identified for co-location with non-industrial uses, specifically residential uses on the upper floors. The site is currently occupied by an office building which has been vacant since 2018. If it is LBH's intention to introduce residential uses at this site, it is suggested</p>	<p>This suggested modification is considered to have merit, provided that the industrial floorspace can be retained. To this effect, modifying the SIL designation to LSIS would achieve this.</p>

Policy	Comment from the Mayor or London	LBH Response
	<p>that the borough downgrade the designation to LSIS or remove the designation entirely.</p>	<p><b>Proposed modifications:</b></p> <p>Amend the policies map / Atlas of Change to remove the site from Strategic Industrial Location (SIL) to Locally Significant Industrial Sites (LSIS).</p> <p>Amend Planning considerations in the Site allocation to refer to Locally Significant Industrial Site instead of Strategic Industrial Location.</p>
<p>Allocation GB2: Watling Farm</p>	<p>In the site allocations, two Green Belt sites have been identified for development. One of them is at Watling Farm and is for the 12 to 13 additional Gypsy and Traveller pitches required to meet identified need. The other site is the Royal National Orthopaedic Hospital (RNOH) and is allocated for the modernization and extension of the hospital as well as 500 new homes. Both sites are currently allocated in the adopted Local Plan and also have associated but lapsed planning permissions. As such, it is assumed that LBH may need to establish exceptional circumstances to justify the proposed developments in these allocations again.</p>	<p>Comments noted. Allocations should recognise the very special circumstances will need to be demonstrated to justify inappropriate development.</p> <p><b>Proposed modifications:</b></p> <p>Add a requirement that development in the Green Belt will need to demonstrate very special circumstances.</p>

**Table 1B: MoL representations of Support**

<b>Policy</b>	<b>Comment by the Mayor or London</b>	<b>LBH Response</b>
Strategic Policy 1: High Quality Growth	The borough is home to one Opportunity Area (OA), namely, Harrow and Wealdstone OA with an indicative capacity for 5,000 homes and 1,000 jobs as set out in Table 2.1 of the LP2021. This is reflected in the draft Plan and is noted and welcomed.	Comments noted and welcomed. <b>No proposed modifications</b>
Policy HO4: Genuinely Affordable Housing	The Mayor of London raised no concerns in relation to the content, the proposed amendments (since Reg 18 consultation) to Draft Policy HO4 and its general conformity with the London Plan (2021)	Comments noted and welcomed <b>No proposed modifications</b>
Policy HO12: Gypsy and Traveller Pitch Provision	<p>The Watling Site Farm site is proposed to fully meet the established need to provide 12-13 pitches between 2022-32, based on the ongoing GLA GTANA, as required by Policy H14 of the London Plan (2021).</p> <p>The GLA GTANA is expected to be completed and published by Spring 2025. Depending on the finding of this, the Plan may need to update the level of G &amp; T pitch need and identify further site allocations to find sufficient capacity.</p>	Advise welcomed and comments noted <b>No proposed modifications</b>
Strategic Policy 4: Local Economy	<p>LBH are promoting strong protection of the borough’s Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS) for industrial use, which is welcomed.</p> <p>Paragraph 5.0.6 of the draft Plan establishes a strategic need to deliver 6,000sqm of industrial floorspace over the life of the Plan. This clarity is welcomed and will enable LBH to broadly plan to meet industrial needs. LBH should establish how much of that need is specifically for Class B uses, and then focus on meeting that need, in particular, in</p>	Comments noted and welcomed. Comments in relation to the former Kodak site are addressed under the section dealing with site allocations. <b>No proposed modifications</b>

Policy	Comment by the Mayor or London	LBH Response
	<p>designated industrial areas. LBH should focus on those industrial needs which it can control, and which fall outside of Use Class E.</p> <p>The Mayor considers that a proactive approach is required to meet the identified need and LBH should do this by identifying and exploring suitable industrial areas where there is capacity for industrial intensification and promote that through masterplans and/or site allocations. Additionally, LBH should monitor industrial development to ensure that the need is met over the Plan period, especially that need which falls within Class B.</p> <p>Site allocation (OA17- Former Kodak Administration Offices) is located within SIL (0.47ha) and has been identified for co-location with non-industrial uses, specifically residential uses on the upper floors. The site is currently occupied by an office building which has been vacant since 2018. If it is LBH's intention to introduce residential uses at this site, it is suggested that the borough downgrade the designation to LSIS or remove the designation entirely.</p> <p>LBH are proposing to designate three new areas of LSIS and release an existing one, which appears to be entirely occupied by residential uses. This is noted and generally supported.</p>	
<p>Policy CI1: Safeguarding and Securing Social Infrastructure</p>	<p>Paragraph 6.1.7 of Policy CI1 sets out that LBH is 'continuing to seek to identify and understand community need related to burial space'. LP2021 Policy S7 sets out that Development Plans should ensure provision is made for the different burial requirements of London's communities. A needs assessment for burial space including an audit</p>	<p>Comments noted and welcomed</p> <p><b>No proposed modifications</b></p>

Policy	Comment by the Mayor or London	LBH Response
	<p>of existing provision should inform the level of need required in the draft Plan.</p> <p>LBH's intention to work with other boroughs is supported, given this can be a cross-boundary issue, and the use of agreements such as through the Duty to Cooperate, or its successor, are encouraged.</p>	
Policy GI1: Green Belt and Metropolitan Open Land	<p>LBH is proposing to adjust an area of MOL, as part of a land swap which will result in no net loss of MOL. This is at Harrow on the Hill School, for which a planning application was allowed at appeal. The Mayor has no objections to this proposed land swap given that there will be no net loss of MOL.</p>	<p>Comments noted and welcomed</p> <p><b>No proposed modifications</b></p>

**Table 1C: MoL Representations with no Proposed Change**

Policy	Comment by the Mayor or London	LBH Response
Strategic Policy 9: Managing Waste & the Circular Economy	<p>The West London Waste Plan (WLWP) was adopted by the West London Waste Planning Group of boroughs, of which LBH is a part, in 2015. As such, the waste plan is considered to be out-of-date. Strategic Policy 09 of the draft Plan is therefore reliant on an out-of-date waste strategy as it was based on the apportionments set out in the 2011 version of the London Plan. For this reason, the draft Local Plan does not adequately demonstrate LBH's ability to meet its waste apportionment targets</p>	<p>Existing waste allocations are safeguarded by part A(d) of this policy as the West London Waste Plan seeks to safeguard identified existing waste sites in the borough and this element of the Plan cannot be considered out-of-date by virtue of any inconsistency with the subsequently adopted London Plan.</p> <p><b>No proposed modifications</b></p>

Policy	Comment by the Mayor or London	LBH Response
	<p>for household, commercial and industrial waste as set out in Table 9.2 of the LP2021.</p> <p>It is noted that a review of the WLWP is underway but is at the very earliest stages of preparation. As such, the Mayor advises that, as a minimum, Policy 09 of the draft Plan should seek to clearly protect existing waste sites until the joint waste plan is completed, at which point it will form part of LBH's Development Plan and will set out the strategic approach for the sustainable management of waste in accordance with the LP2021.</p>	
Policy M2: Parking	<p>While the adoption of LP2021 maximum car parking standards is supported, further amendments to the wording of specific policies are needed to ensure that the Local Plan is fully consistent with LP2021 parking policies. A number of site allocations are proposing the re-provision of car parking where this would exceed maximum car parking standards. For a number of sites, the requirement to retain parking spaces does not take into account the location or PTAL and as a result fails to optimise use of the site. To ensure best use of land in well-connected locations, these requirements should be amended.</p>	<p>Noted. These matters are addressed in detail in a separate Statement of Common Ground with TfL.</p> <p><b>No proposed modifications</b></p>
Allocation OAI0: Wealdstone Probation Office	<p>The allocation is currently designated LSIS and as such it should be made clear that current industrial capacity should at least be maintained or intensified. One way of</p>	<p>Reference to the agent of change is already in the policy. Monitoring / baselines are considered a separate process to site allocations.</p>

Policy	Comment by the Mayor or London	LBH Response
	<p>doing this would be to set out the current baseline industrial floorspace capacity so that it can be monitored. As the intention is to co-locate industrial with residential development, reference to the agent of change principle should be made clear so that industrial activities can take place effectively without causing nuisance to future residents.</p>	<p><b>No proposed modifications</b></p>
<p>Allocation OAI3: Travis Perkins Wealdstone</p>	<p>Both allocations are currently designated LSIS and as such it should be made clear that current industrial capacity should at least be maintained or intensified.</p> <p>One way of doing this would be to set out the current baseline industrial floorspace capacity so that it can be monitored. As the intention is to co-locate industrial with residential development, reference to the agent of change principle should be made clear so that industrial activities can take place effectively without causing nuisance to future residents.</p>	<p>Comments noted. These points are considered in the site allocation and associated Policy LR3: Industrial Land.</p> <p><b>No proposed modifications</b></p>
<p>Allocation OA16: Kodak</p>	<p>The northern part of the site is currently designated as SIL. It is noted that the site is an allocation in the current Local Plan and that there has been a significant planning history in recent years. To be consistent with Policy E7 of the LP2021 it is important that the allocation sets out how, and if, the SIL boundary is to change. As set out in Policy E5(C) of the LP2021, non-industrial uses should not be located within SIL. If it is</p>	<p>The Atlas of Change identifies the proposed consolidation of the former SIL designation to reflect the development of the site since the current AAP was adopted. The development and consolidation of the SIL is consistent with that envisaged by the AAP should the former Kodak Factor close, which it has. The consolidated area of SIL in the north of the site reflects</p>

Policy	Comment by the Mayor or London	LBH Response
	<p>the intention to introduce non-industrial uses within the area designated as SIL the boundary will be required to change, resulting in either downgrading to LSIS or to non-designated industrial land. If SIL is to be lost, as a result of the proposed reconfiguration, LBH will need to establish how this is being replaced and how it affects the boroughs plans to meet industrial need.</p> <p>In addition, as the site is adjacent to SIL it should be clear that the introduction of non-industrial elements should not prevent or negatively impact the ability of industrial activity to take place . As set out in Policy E5D of the LP2021 residential development adjacent to SILs should be designed to ensure that existing or potential industrial activities in SIL are not compromised.</p>	<p>this and has been developed in its entity for B2/B8 uses.</p> <p><b>No proposed modifications</b></p>