



EXAMINATION OF THE HARROW LOCAL PLAN 2021-2041

HEARING STATEMENT

MATTER 1: LEGAL COMPLIANCE AND THE DUTY TO COOPERATE

ISSUES 1 AND 2

APPENDIX 1: DUTY TO CO-OPERATE CORRESPONDENCE REQUESTED AS PART OF ISSUE 1

5 June 2025

Duty to Cooperate:

Three Rivers District Council and London Borough of Harrow

Meeting Notes

Meeting Details

Date	Tuesday 24 March
Location	Three Rivers District Council/LB Harrow Teleconference meeting due to COVID19

Attendance

Claire May (CM)	Callum Sayers (CS)
Marko Kalik (MK)	David Hughes (DH)
Lauren McCullagh (LM)	

		Actions
1.	Introductions and attendance	
	Telephone	
2.	Update on Local Plans	
	<p>Three Rivers</p> <ul style="list-style-type: none"> • SHELAA process is near complete. Housing density has risen to a minimum of 50dph – higher in more accessible areas near stations. • Little vacant housing stock or TRDC owned land is available within the urban area. As part of the Urban Capacity Study, TRDC are in the process of writing to landowners of sites in the urban area. Some responses have been received confirming that some of the urban capacity study sites are not available. • Currently a further 3,800+ homes are needed to meet the District's housing need. The New Settlement Scoping Study is first looking at edge of existing settlement boundaries in order to identify land that has not been put forward through the Call for Sites process. 17 possible edge-of-settlement sites have been identified and will be included in the SHELAA, although initial assessments show many are likely to be unsuitable. 	

	<ul style="list-style-type: none"> • The New Settlement Scoping Study is then looking at areas for potential new settlement(s) (possibly 2/3 locations identified). At least 4,200 dwellings would be required to make a new settlement sustainable. 60% of the site would be considered developable and 40% would be for employment, open space etc. The new settlement options work will consider links transport etc. • A tender brief will be completed soon for further technical work on the potential new settlement areas that were identified through the Scoping Study. MHCLG have confirmed that they will not be providing support in the form of consultants for the technical study. • It was noted that the new settlement options work may not find any appropriate land for development. • A Stage 3 Green Belt study has been completed as part of the new settlement work. • A Strategic Growth Locations Study is being undertaken as part of the South West Herts Joint Strategic Plan and this work may potentially find new settlement options which TRDC could use as evidence base. • Officer recommendations on sites are to be reported to Local Plan Sub-Committee in July. • The start date of Local Plan will be 2016 following legal advice so the overall housing need is approx. 11,300. <p>LB Harrow</p> <ul style="list-style-type: none"> • LB Harrow adopted the current Local Plan in 2013 but are looking to review the LP following publication of the draft London Plan and changes to the NPPF. Currently waiting for more clarity on the draft London Plan and may have to undertake a Green Belt Review in future. • In February 2019, residents were concerned about sites along the Three Rivers-Harrow boundary. DH stated that LB of Harrow advised resident that the sites were under consideration as part of TRDC's Local Plan review, would be subject to the proper assessment process. DH stated that the site assessment process seemed robust and that LB Harrow would make TRDC aware of any further challenges to sites in the TRDC area. • CM advised that these sites along the Harrow-Three Rivers boundary are not being recommended by Officers for allocation. 	
3. Request to accommodate unmet housing and employment need		
	<ul style="list-style-type: none"> • TRDC letter of the 6 March 2020 requesting LB Harrow to consider whether they can accommodate any of TRDC's housing and employment need. • Formal response to the letter has not yet been received, however there was a verbal agreement that the LPAs are not able to meet each other's housing and warehousing needs. • DH stated that LB Harrow will send a formal response to the letter. 	LBH

4. Housing Sites		
	<ul style="list-style-type: none"> CM explained Officers were not looking to recommend much land in South Oxhey/Carpenders Park area for allocation – one small brownfield site along Little Oxhey Lane being recommended for allocation. CM stated that land between Little Oxhey Lane and the Three Rivers-Harrow boundary had been promoted. Majority of land along Oxhey Lane also promoted. The sites are not being proposed for allocation but it is anticipated that there will be challenges at the Examination. <i>TRDC to send a map showing the sites not being proposed for allocation to ensure LB Harrow are aware.</i> 	TRDC
5. Employment		
	<ul style="list-style-type: none"> CM/MK advised that existing commitments will meet TRDC's office (B1 Use Class) floorspace requirements but there is an identified need for approximately 7ha of land for industrial/warehouse use (B1c/B2/B8 Use Class) which cannot be accommodated on land not designated as Green Belt. Officers are looking to recommend allocation of a site in the south of the District to meet this need. Land will also be allocated Leavesden Studios Use. CS stated that evidence from the West London Economic Land Review shows there is a need to provide warehousing / industrial floorspace but that Harrow has the lowest industrial land quantum land across 7 boroughs. Difficult to deliver employment land as there is are no strategic links in Harrow and the M1 bisects Green Belt land and viability of delivering industrial land. DH noted that there has been significant losses of office floorspace to residential as a result of permitted development (although much floorspace was already vacant). 	
6. Education		
	<ul style="list-style-type: none"> TRDC are proposing the allocation of a secondary school site in Carpenders Park along Oxhey Lane (Site CFS11). CM: The site is adjacent to the boundary with Hertsmere BC and in close proximity to LB Harrow-Three Rivers boundary. Uncertainty over how this could assist with education provision outside of the Herts county area due to school administrative procedures, but it may relieve some education pressure in LB Harrow. CM advised that any larger/new settlements in Three Rivers will have their own provision for schools. DH queried the methodology for identifying the secondary school site and CM stated that Herts County Council undertook a site search in 2008/2011 but did not find a site in the South Oxhey/Carpenders Park area, where there is a historical problem of secondary school provision. Since the adoption of the Site Allocations LLD in 2014, the site became available for sale and HCC bought the land specifically for education provision. 	

	<ul style="list-style-type: none"> DH advised that a secondary school has recently been completed to the south of the Harrow borough; the land was previously open space but went through the site identification process. 	
7. Infrastructure		
	<p>Health</p> <ul style="list-style-type: none"> TRDC strategic sites can accommodate their own health needs. No identified need for GP/Health in Carpenders Park/South Oxhey area. DH stated that LB Harrow will work with the North West CCG and most growth is in the Harrow and Wealdstone area – cannot identify any shortfalls along the Harrow-Three Rivers boundary. <p>Wastewater</p> <ul style="list-style-type: none"> CM stated that Maple Lodge will not require further land to increase its capacity. Thames Water have said that given future growth, the current system would require an update/upgrade. Role of the infrastructure provider is to ensure the system is in place. CM queried whether the wastewater provider to Harrow was the Maple Lodge STW. <p>Transport</p> <ul style="list-style-type: none"> Acknowledge the importance of M1 and M25 and need to coordinate via COMET the impacts. CM stated that Herts County council are undertaking a COMET run on proposed sites but have not yet seen initial outcomes of the study; TRDC will update LB Harrow if any mitigation measures are identified as required near the Harrow-Three Rivers boundary. CM advised that TRDC may have to undertake a new piece of work to analyse specific traffic impacts of strategic sites. Talked about HCCs new framework for transport assessments – quicker study. Look at sharing a methodology for this work. DH noted that the Hatch End-Watford Junction overground line is shared across the boundaries. LB Harrow engaging with London north-western railway/TFL in regards to capacity on station platforms, following strategic sites being allocated/coming forwards in the area. DH noted that there are some London bus routes to Bushey but no issues could be identified with public transport to the north of Harrow. CM stated there was no planned rail infrastructure in Three Rivers. <p>Green Infrastructure</p> <ul style="list-style-type: none"> CM advised the current green infrastructure network includes designated open spaces along the Three Rivers-Harrow boundary. Could look to look areas across the Three Rivers-Harrow boundary. 	TRDC
8. Statement of Common Ground		
	<ul style="list-style-type: none"> Suggested using the PAS template. TRDC to draft a SoCG. 	TRDC

	<ul style="list-style-type: none">• Work on draft wording of SOCG over the next few months.	
9.	AOB	
	None	
10.	Next meeting	
	<ul style="list-style-type: none">• Schedule another call/meeting for 1-2 months' time to update both authorities on progress.	TRDC

Duty to Cooperate:

Three Rivers District Council and London Borough of Harrow

Meeting Notes

Meeting Details

Date	Tuesday 9 June
Location	Three Rivers District Council/LB Harrow Teleconference meeting due to COVID19

Attendance

Claire May (CM)	Callum Sayers (CS)
Marko Kalik (MK)	David Hughes (DH)
Lauren McCullagh (LM)	
Tori Elliott (TE)	

		Actions
1.	Introductions and attendance	
	Telephone	
2.	Update on Local Plans	
	<p>Three Rivers</p> <ul style="list-style-type: none"> CM provided an update on ongoing evidence base studies: <ul style="list-style-type: none"> New Settlement Scoping Study is ongoing. Urban Capacity Study almost finalised. Approximately 60 sites were included in the SHELAA as a result; the sites were a mix of Council owned and privately owned sites. Contact with private landowners have been made but unfortunately not many responses were received. Additional transport modelling is being commissioned shortly. LBH can be informed of any outcomes of the work in relation to the Three Rivers/Harrow boundary and surrounding area. Local Plan Sub-Committee meetings are beginning next week; there are four meetings programmed in to consider draft policies and recommended site allocations. TRDC sent LBH a map of all the sites which were promoted in the District to show LBH sites located along the TRDC/LBH boundary. 	

	<ul style="list-style-type: none"> • CM advised that TRDC would inform LBH of possible changes to proposed site allocations located along the LBH/TRDC boundaries following the outcomes of the Local Plan Sub-Committee meetings. • CM advised the Local Plan timetable has not changed since the previous meeting with a publication version of the Local Plan scheduled for early 2021. <p>LB Harrow</p> <ul style="list-style-type: none"> • DH advised that the housing target as set by Draft New London Plan has been revised downwards. • LBH have commissioned some work in relation to identifying small sites and calculating tall buildings, to assist in meeting the housing target within the draft London Plan • Target of housing for small sites to meet in the draft new London Plan; LBH submitted a response to the EiP on the difficulty in meeting these targets, but work has now been undertaken to enable an increase in delivery of housing from these sources – funded by the GLA Homebuilding Capacity Fund. • CS advised that LB Harrow has successfully obtained funding for two projects from the Homebuilding Capacity Fund. The first project is a Characterisation Study of the Borough in order to identify areas where homebuilding could increase and this will look for appropriate locations for tall buildings in Harrow. The second project is a Small Sites Capacity Study and Design Code project which is being undertaken in order to identify small sites in the Borough for housing, which is intended to conclude in a Supplementary Planning Document. • CS advised that the target set by the Draft LoLondon Plan Target for housing to be delivered through small sites no longer exists, but LBH recognise that small sites are still a source of housing so the Council is looking to bring potential housing forward from small sites in any case. • Both projects are at relatively early stages. • DH advised that an Issues and Options consultation is intended for January/February 2021, followed by a Regulation 18 consultation in Autumn 2021. Submission is anticipated for Autumn 2022. 	
3. Request to accommodate unmet housing and employment need		
	<ul style="list-style-type: none"> • CM expressed thanks to LBH for sending formal response to letter. • CM read the GLA's response to TRDC's letter requesting accommodation of need, which states that the 'Intend to Publish London Plan' does not identify any surplus capacity to accommodate unmet housing need from outside London and that the GLA will engage in the preparation of the South West Herts Joint Strategic Plan. 	

8. Statement of Common Ground		
	<ul style="list-style-type: none"> TRDC to begin drafting Statement of Common Ground, with the discussion of strategic issues in the 24 March 2020 meeting agreed as an appropriate to use as a basis for the Statement of Common Ground. 	TRDC
9. AOB		
	None	
10. Next meeting		
	<ul style="list-style-type: none"> Schedule another call/meeting for 1-2 months' time to update both authorities on progress and following TRDC Committee meetings. 	TRDC

Duty to Cooperate meeting (11.00: 15 July 2024)

Three Rivers

RM / HN / CS

Marko Kalik (MK)

Aaron Roberts (AR)

Meeting Agenda.

1. Welcome/Introductions
2. Purpose of the meeting – i.e. to discuss strategic planning matters and cross -boundary issues affecting the authorities

3. Update on status of respective local plans, SPDs etc.
Three Rivers did not provide a Reg18 response to LB Harrow Local Plan...may do at Site allocations
RM gave update on local plan approach.

MK – LBH to meet housing need in full? RM – yes. Specifically London plan 10 year target.
Call for sites hope to deal with following 10 year.

Three Rivers-I&O 2017 then multiple Reg18.

2021 full plan Reg18 with aim of meeting standard method – members removed 2 sites at final full council so could not meet target

More work to find sites. Michael Gove letter / members wanted to look at lower growth – another Reg18

Officer recommendations – not exceptional circumstances, although some circumstances given amount of Greenbelt

Members didn't agree within officers recommendation – went further and below half of housing target. A lot of public support. Taking this approach Reg19 (agreement 16th July Full Council).

Reg19 Oct/Nov Reg 19 and then EiP March time approx..)

Have had some speculative PP's – EiP agreed with officers but housing need trumped it so was allowed.

MK: Southwest Herts Strategic Plan (5 Authorities): Vision / Objectives in place, looking at Strategic Growth Locations. Still working with members – slow steps. Potential pilot scheme – may get some funding from central govt.

4. Discussion points:
 - National policy (LURA) and London Plan, review and SoS directions
 - Policy matters including meeting housing, employment requirements
See above re housing
Economic study (5 authorities) as a joint area. office space – slight oversupply
Industrial – there is a need, some can be provided. GB constraint – likely to be in other Authorities in Brownfield.

A4D on TC's and Employment sites – long winded but worth going through the process.

-Development proposals (strategic sites/close to boundaries, cumulative impacts-IIA)

RM: Mentioned (confidentially at this stage) that call for sites submissions in the Green Belt within north-west of borough .had been submitted; no decisions made and will need to go through due site suitability and selection process. but obvious concerns around GB.

MK: Noted. Noted the removal of site allocations on Carpenders Park. Nothing proposed in proximity to the administrative boundary. A secondary school up closer to Watford Heath – off A4048. In GB so may not go through – but no other locations for a secondary school.

MK: have about 1000 homes identified on brownfield sites – which leave about 10k to be found in GB.

-Town centre development/regeneration

RM: Masterplan for H Met Centre. Nothing near administrative boundary.

MK: South Oxhey regen – in final phases. Built out more homes than originally planned (RM 400 homes?).

MK: Currently have circa 2.4years land for housing and have a score of 46% on HDT.

-Infrastructure (health, transportation, education, cemeteries, open spaces, leisure etc)

-Gypsies and Travellers

RM: Identified need as set out in London Plan, but likely to meet this on existing allocated site.

AR: GTAA study ongoing. Evidence gathering at the moment. Last one (2017) a small need – maybe 1 – 2 pitches. This year did grant 9 pitches to existing sites. Some temp permissions then became permanent.

- Burial Space.

KN: covered off capacity / religious groups. Doing some in house work on the matter. Would look to do some sub-regional work.

MK: Have had an application to extend cemetery at Carpenders Park

AR: St Aubyn's did a full study – where as Three River's have not. Current IDP that is looking into it. Looking to have IDP finalised September 2024.

-Evidence base including scope for joint studies

Potentially around cemeteries – very amenable to joint working.

-Other matters- e.g. Article 4 directions

Noted above. Town centres and industrial sites. E Use Class to residential.

5. Potential statements of common ground
6. AOB – none specific
7. Next steps – authorities will keep in touch and update as appropriate.

Planning Policy Manager
London Borough of Harrow
Civic Centre
PO Box 37
Station Road
Harrow
HA1 2UY

My Ref : DCES/CM
Your Ref :
Date : 15 June 2021
Contact : Claire May
Tel No : 01923 776611
Email Add : Claire.may@threerivers.gov.uk

Dear Sir/Madam,

Three Rivers District Council

On the 6 March 2020 I wrote to you asking whether your authority was able to accommodate some of the growth shortfall that was identified at that time to inform our considerations as to whether to amend Green Belt boundaries to accommodate that need.

At that stage of the preparation of our Local Plan, the Strategic Housing Land Availability Assessment and Urban Capacity Study indicated that less than 3,600 homes (taking account of completions, commitments and a windfall allowance) could be accommodated on land not designated as Green Belt and that approximately 7ha of the identified need for industrial/warehouse use could also not be accommodated on land not designated as Green Belt.

Subsequent to our letter of the 6 March 2020 we completed further work in the form of an Edge of Settlement & New Settlement Scoping Report. This desktop based study first sought to identify potential locations at the edge of existing settlements which had not so far been considered in the Strategic Housing and Employment Land Availability Assessment following the Call for Sites exercises undertaken.

A total of 17 potential edge of settlement locations were identified through the desktop assessment. Out of these, four edge of settlement sites were considered deliverable/developable for potential allocation following the SHELAA assessment process. These sites, along with other sites in the Green Belt that were considered deliverable/developable through the SHELAA process, and in consideration of the Sustainability Appraisals and evidence base studies such as the Green Belt Reviews, meant that it was likely that we would be able to meet the housing target subject to Council approval. As a result, we informed you through discussions at our Duty to Cooperate meetings that we would be seeking to meet the housing target.

The work we have undertaken to ensure that previously developed land is maximised is as follows:

- Reviewed the housing densities and capacities of all potential sites located within settlement boundaries
- Applied a significant uplift in the average density of residential development in accordance with paragraph 123 of the NPPF.
- Assessed the utilisation of local vacant housing stock

- Reviewed the achievability and deliverability of Three Rivers' own land assets.
- Contacted owners/occupiers of potential brownfield sites who had not yet submitted any of their land holdings

At the Annual Council meeting of the 25 May 2021, it was resolved to omit two strategic sites and the potential contingency sites from the Regulation 18 documents prior to consultation. You can view the proposed amendments at <https://www.threerivers.gov.uk/meeting/annual-council> at Recommendation 6.

As a result, the sites in the Regulation 18 documents for potential allocation will deliver approximately 8,973 dwellings (84% of the residual housing target) resulting in a shortfall of 1,705 dwellings over the Plan period against the current standard method of calculating local housing need.

As you are aware, the Regulation 18 stage is an early stage in the preparation of the Local Plan and representations received will be considered and amendments made where appropriate to the Draft Local Plan prior to the Regulation 19 stage.

Your response to my letter of the 6 March 2020 you were not at that stage in a position to accommodate any of our shortfall. I am asking now whether you are willing to have further discussions to ascertain whether the London Borough of Harrow would be able to accommodate any of our shortfall as part of your Local Plan review.

I would like to arrange a further meeting with Lead Members and Senior Officers as soon as possible so that we can take this matter forward. Please can you let me know your availability for a virtual meeting in the next couple of weeks as soon as you are able?

I would be grateful for a response to this letter at the earliest opportunity. If you have any queries relating to the above request, please do not hesitate to contact me.

Yours sincerely



Claire May MSc MRTPI
Head of Planning Policy & Projects
Three Rivers District Council

Community Directorate
Acting Corporate Director – Mark Billington

Claire May
Head of Planning Policy & Projects
Three Rivers District Council
Three Rivers House
Northway
Rickmansworth
Herts WD3 1RL

1 July 2021

Our ref: DH/CS

Your Ref: DCES/CM

By email: Claire.may@threerivers.gov.uk

Dear Claire,

Re: Three Rivers District Council Local Plan Review

Thank you for your letter dated 15th June 2021 in relation to the review of Three Rivers District Council Local Plan. This letter follows a previous letter from Three Rivers Local Planning Authority on 6th March 2020.

Harrow notes the content of the letter and acknowledges the difficulty faced by Three Rivers District Council in meeting its local housing need as calculated using the Government's Standard Methodology.

By way of context, the London Plan (2021) was published in March this year and sets the housing targets / housing requirements for London boroughs. For Harrow, the target is a minimum 802 dwellings per year. Whilst it is acknowledged that this is a reduction on the figure included in the draft new London Plan (1,392 per year), it nonetheless represents a challenging target to achieve. Notwithstanding the publication of the London Plan (2021), the Secretary of State made it clear that he expects an early review of the London Plan given the shortfall in the total housing target in the Plan relative to London's need. Based on the commentary and direction of travel from the Secretary of State regarding housing numbers, it is anticipated that the housing target for Harrow is likely to increase.

As set out in the previous letter of the 4th May 2020, the previous local housing need figure for Harrow was 1,922 dwellings per annum using the standard methodology applicable at the time. However, with the introduction of a 35% uplift for urban areas (including all London boroughs) in December 2020, our local housing need target has increased to 2,538 dwellings per year since we last corresponded.

Historically, Harrow has had a strong housing delivery (for example, we achieved 175% in the first Housing Delivery Test, 169% in the second test and 189% in the third and most recent test). However, the latest housing need figure of 2,538 (with the 35% uplift) dwellings per annum and our own SHMA (2018) figure 1,480 dwellings per annum are significantly beyond what LB Harrow considers realistic under our current Local Plan or indeed, the London Plan (2021).

Harrow has committed to review its Local Plan in light of the new London Plan and its increased housing target for Harrow. As part of this process we will seek to demonstrate how we can meet

this figure, as required by the National Planning Policy Framework (NPPF). As noted above, this figure will be challenging given it is a significant increase on the previous target. In terms of the Harrow Local Plan review, it is anticipated that an initial 'issue and options' consultation and Call for Sites will be published Autumn 2021.

Therefore, whilst Harrow seeks to work proactively and collaboratively with its neighbouring boroughs, in light of the above, we consider that we are still not in a position to assist with meeting Three Rivers District Council's local housing need requirements.

Potential Development Sites

It is noted in the Three Rivers Regulation 18 documentation presented to Full Council that the proposed allocated sites include sites located on the borough boundary with Harrow. Of particular note is proposed allocated site PCS47, which has a Green Belt designation (among others), and adjoins Green Belt within the London Borough of Harrow. In this regard, Harrow notes that the NPPF (2019) at paragraph 134 sets out the five purposes that Green Belt serves, and Harrow would note the proximity of the site with the Hatch End urban area. Following on from this any release of Green Belt for other purposes would need to comply with paragraphs 136 – 142 of the NPPF (2019).

Should you have any queries, please do not hesitate to contact David Hughes, Planning Policy Manager by email: david.hughes@harrow.gov.uk or by telephone: 0208 736 6082.

Yours sincerely

David Hughes
Planning Policy Manager

Greenbelt Review (August 2017)

Site E1



Parcel	Sprawl	Merger	Encroachment	Setting	Regeneration	Overall	
							prevention of their merger, but also preventing sprawl and encroachment in this locality.
N13	C	C	SC	LC	LC	SC	Part of open land between Watford and Bricket Wood, preventing sprawl and encroachment into open countryside to the north, as well as strategically preventing the merger of Watford and Bricket Wood.
N14	C	C	C	LC	LC	C	Contains built development at Watford preventing sprawl, and locally the merger of Watford and Bricket Wood.
N15	LC	C	LC	C	LC	C	Part of the remaining open land between Watford and Bricket Wood, although the land is compromised by the intrusion of built development and its severance from the wider Green Belt.
N16	C	C	LC	C	LC	C	Part of open land between Watford and Bricket Wood and the principal gap between the two.
E1	C	SC	C	LC	LC	SC	Part of the open land separating Carpenders Park and Hatch End, helping to prevent their merger and broader encroachment in this location.
E2	LC	C	LC	C	LC	C	Part of open land to the east of Carpenders Park, albeit well contained by roads and the built edge of Carpenders Park.

Stage 2 Greenbelt Assessment (October 2019)

Site SO6

Settlement	Parcel	Harm Rating
South Oxhey	S01	High
	S02	High
	S03	Very High
	S04	Moderate
	S05	Low-Moderate
	S06	Very High
	S07	Low-Moderate
	S08	Low
	S09	Low-Moderate
Watford East	WE1	Low
	WE2	Very High
	WE3	Low-Moderate
	WE4	Low-Moderate
	WE5	High
	WE6	Moderate-High
	WE7	Moderate-High
	WE8	Low-Moderate



South Oxhey Parcel SO6

Description

Open agricultural fields divided by hedgerows, located on the southern edge of Carpenders Park (part of the inset settlement of South Oxhey) and the Green Belt within SO4. The hedged B4542 marks the boundary with Carpenders Park and adjacent Green Belt to the north, and a railway line and associated tree cover creates a strong boundary to further inset development within South Oxhey to the west. A coach depot with associated buildings and handstanding, and a stables, are situated towards the north eastern corner of the parcel between Little Oxhey Lane and Oxhey Lane, but do not have a significant urbanising influence on the wider parcel. Further hedged fields lie beyond the district boundary to the south, and the tree-lined A4008 separates the parcel from Grims Dyke Golf Club to the east.

Impact on contribution

Purpose 1 Contribution - Check the unrestricted sprawl of large built-up areas

Significant

South Oxhey is close enough to more contiguous urban development to the north and west to be considered to constitute part of the large built-up area extending out from Greater London. The parcel is open and although the inset development of Hatch End south of the parcel provides some containment of the Green Belt land south of the parcel, the open fields are large enough to be considered as countryside and retain a countryside character. The tree fringed railway line and B4542 create strong distinction from the adjoining inset settlement edge of South Oxhey to the west and north. Therefore, development would be considered sprawl of the large built up area.

Purpose 2 Contribution - Prevent neighbouring towns merging into one another

Significant

Release of land would significantly diminish the settlement gap between South Oxhey and Hatch End, which in turn forms the largest area of open land between the towns of Watford and Pinner.

Purpose 3 Contribution - Assist in safeguarding the countryside from encroachment

Significant

The parcel is open and although the inset development of Hatch End south of the parcel provides some containment of the Green Belt land south of the parcel, the open fields are large enough to be considered as countryside and retain a countryside character. The tree lined railway line and B4542 create strong distinction from the adjoining inset settlement edge of South Oxhey to the west and northwest. Therefore, development would be considered countryside encroachment.

Impact on adjacent Green Belt

Moderate

Release of the parcel would cause limited impact to Green Belt land to the east and west, due to the presence of the A4008 and railway line to the east and west respectively, which would limit containment and create strong boundary features. However to the south it would cause increased containment of Green Belt land in an important settlement gap and would create a weaker Green Belt boundary.

Overall harm to Green Belt purposes from release of land

Very high

Release of the parcel would have a significant impact on checking sprawl, preventing the merging of towns and countryside encroachment. It would have a minor impact on adjacent Green Belt. The harm to the Green Belt of releasing this parcel would be Very High.

Three Rivers and Watford Stage 2 Green Belt Assessment

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October 2019

South Oxhey Parcel SO6

Potential to limit harm

There are no notable variations in harm within the parcel. Any partial release of land would weaken the integrity of the remainder of the parcel.

Place Directorate
Corporate Director – Dipti Patel

Planning Policy
Three Rivers District Council
Three Rivers House
Northway
Rickmansworth
Herts
WD3 1RL

Thursday, 09 March 2023

By email: localplanconsult@threerivers.gov.uk

Dear Sir / Madam,

Re: Three Rivers District Council Local Plan Review: Regulation 18 Additional Sites for Potential Allocation.

Thank you for your email dated 27th January 2023 in relation to the above. The following response sets out initial concerns and objections regarding the draft Plan, specifically in relation to site allocations where there is a de-designation of Green Belt land. LB Harrow welcomes ongoing dialogue with Three Rivers District Council throughout the Local Plan Review, and seeks to work proactively to address the concerns and objections raised in this letter, as well as any additional strategic cross boundary matters that may arise as each borough's Local Plan progresses.

The following response follows on from previous correspondence between LB Harrow and Three Rivers District Council. In relation to development sites proposed at that stage, Harrow has previously made specific comment in relation to proposed allocated site PCS47, which was as follows;

It is noted in the Three Rivers Regulation 18 documentation presented to Full Council that the proposed allocated sites include sites located on the borough boundary with Harrow. Of particular note is proposed allocated site PCS47, which has a Green Belt designation (among others), and adjoins Green Belt within the London Borough of Harrow. In this regard, Harrow notes that the NPPF (2019) at paragraph 134 sets out the five purposes that Green Belt serves, and Harrow would note the proximity of the site with the Hatch End urban area. Following on from this any release of Green Belt for other purposes would need to comply with paragraphs 136 – 142 of the NPPF (2019).

Whilst the above did not amount to an objection to the loss of Green Belt, it set out that any release must be carried out in a manner that is compliant with the relevant provisions of the NPPF. Since that time, there have been notable changes in the approach to the Green Belt at a national level. It is noted that the proposed amendments to the NPPF (2021) which were published in December 2022 (and currently subject to consultation) have made it clear that 'Green belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period' (Paragraph 142 NPPF (2021) (showing indicative changes for consultation)). By reason of the changes noted to the NPPF, Harrow Council wish to add further to our original concerns in relation to Green Belt release in general, and more specifically to site allocation PCS47.

The Three Rivers District Council Strategic Housing and Employment Land Availability Assessment (2020) (SHELAA) sets out in paragraph 3.17 in relation to site allocations that Green Belt has not been excluded 'given the quantum of new development required in the next 15 years there was a need to identify sites that are currently in the Green Belt for Development'. It goes on to note that a Green Belt Review has been undertaken to assist in informing the suitability of sites located in the Green Belt. Sites deliverable in the Green Belt will be removed from the Green Belt through the Local Plan process.

The regulation 18 consultation is supported by a Stage 1 (August 2017) and Stage 2 (October 2019) Green Belt Review. It is noted in the Stage 1 review (2017) that part of the site E1 (Later identified as PCS47 as a site allocation) was identified as 'Part of the open land separating Carpenders Park and Hatch End, helping to prevent their merger and broader encroachment in this location. The Stage 2 Green Belt Assessment (2019), identified this site as SO6 (formerly Site E1 through the Stage 1 review). The reviews carried out in the Stage 1 and Stage 2 Green Belt Reviews (noting the Stage 3 review (2020) relating to New Settlement Analysis), allowed detailed site assessments, as set out in Appendix 7d (previously considered sites detailed assessment). With regard to the now allocated PCS47 site, the site assessment concludes;

'The site is located in the Green Belt. Harm to the Green Belt of releasing the wider parcel (in which the site is located) is assessed as very high. The need for housing does not outweigh 'very high' harm to the Green Belt through the release of land. Whilst the site would contribute to meeting housing needs, its development would not deliver any strategic infrastructure. It is considered that allocating the site would not outweigh the very high harm to the Green Belt, if released. The site is therefore deemed unsuitable for residential allocation.'

It would appear that significant weight of delivering housing / development has been attached to the continued proposed allocation of this Green Belt site for residential purposes (and removal from Green Belt), which is located on the administrative boundary with Harrow but forms part of the Green Belt separating urban areas within Harrow (Hatch End) and Three Rivers (Carpenters Park). In relation to the additional proposed site allocations as notified in the email dated above, there do not appear to be any that are in close proximity to the Harrow administration boundary. However, the principle of approach to any Green Belt de-designation would be relevant. By reason of the change in approach to Green Belt as set out in the proposed changes to the NPPF (2021) as noted above, and the Three Rivers assessment of site PCS47 in particular, Harrow object to the proposed de-designation of Green Belt generally and specifically site PCS47 which would clearly be against the purposes of Green Belt (reflected in Three Rivers' own evidence base) and undermine the remaining adjoining Green Belt in Harrow.

Conclusion

The London Borough of Harrow acknowledges the pressures faced by Three Rivers in delivering an effective and efficient Local Plan. However, as noted above, we have particular concerns about the proposed release of land from Green Belt in terms of principle and justification for such de-designation, and potential impacts upon Harrow and therefore object to this aspect of the plan, specifically in relation to Site Allocation PCS47. Harrow would welcome the continued opportunity to comment further on the development of the plan going forward and any subsequent implementation. We reserve the right to refine our position on the draft Three Rivers Local Plan as it further develops and as LB Harrow progresses its own evidence base and Local Plan review.

Should you have any queries in relation to the above, please do not hesitate to contact Viv Evans (Chief Planning Officer) at Viv.Evans@harrow.gov.uk

Yours sincerely



Viv Evans
Chief Planning Officer, Place Directorate

Planning Policy
Three Rivers District Council
Three Rivers House
Northway
Rickmansworth
Herts
WD3 1RL

By email: localplanconsult@threerivers.gov.uk

24th November 2023

Dear Sir / Madam

Thank you for your notification of the above consultation. It is understood that a decision has been taken to consult on a lower growth option for Three Rivers, focusing on housing site allocations and reducing the impact on the Green Belt. This lower growth option will however fall short of meeting identified housing need for the borough.

The London Borough of Harrow previously provided a consultation response (20th February 2023), for the Regulation 18 Additional Sites for Potential Allocation. In this response, LB Harrow acknowledged the pressures faced by Three Rivers District Council in preparing an effective Local Plan that met identified housing need. However, the response set out an objection in relation to the proposed release of Green Belt and the reasoning behind this. The objection set out concern that the sites proposed to be released did not meet the NPPF(2021) requirements for Green Belt release. In particular, in relation to impacts on LB Harrow, the response then primarily set out an objection to proposed allocated site PCS47, which is located on the shared administrative boundary between the two authorities, which was proposed to be released from its Green Belt designation.

The current Part 4 Regulation 18 with the lower growth option, has removed a number of Green Belt sites that were previously proposed to be de-designated from Green Belt. The Council welcome the revised approach, and specifically the removal of site PCS47 as a site sought to be released as set out in Appendix 1 – Sites not proposed for development by TRDC (Page 11).

Conclusion

By reason of the above, the London Borough of Harrow no longer hold an objection to this aspect of the plan. Harrow would welcome the continued opportunity to comment further on the development of the plan going forward and any subsequent implementation. We reserve the right to refine our position on the draft Three Rivers Local Plan as it further develops and as LB Harrow progresses its own evidence base and Local Plan review.

Yours sincerely



Viv Evans
Chief Planning Officer

Callum Sayers

From: trldf (Three Rivers) <trldf@threerivers.gov.uk>
Sent: 23 April 2024 16:01
To: Harrow Local Plan
Subject: RE: Response to London Borough of Harrow - New Local Plan Regulation 18 Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Red Category

Caution: External email

Dear Local Plan Team,

London Borough of Harrow - Regulation 18: Local Plan Consultation

Thank you for the opportunity to comment on the above Regulation 18 Local Plan consultation.

We broadly support the overarching spatial strategy for the Local Plan which shows that the majority of new development is being directed to the Harrow and Wealdstone Opportunity Area, to other town centres with modest levels of growth and to suburban areas commensurate with their existing character. With regards to the housing numbers, the Borough is in a position to achieve more given its sustainable location and good connectivity. We note however that it is important for any approach to be fully justified in light of the most up to date national policy and guidance. This should include a robust review of opportunities and constraints alongside other material considerations.

I hope that you find the above response constructive in taking forward your emerging Local Plan. We reserve the right to refine our position on the draft Harrow Local Plan as it further develops and as we progress our own Local Plan.

We also suggest that we seek to liaise to discuss for any cross-boundary issues and progress with our respective plan-making.

Yours sincerely,

Three Rivers Planning Policy Team

From: Harrow Local Plan <Local.Plan@harrow.gov.uk>
Sent: Monday, April 22, 2024 7:35 AM
Subject: Just a few day left to comment! | New Local Plan | Find out More

Just a few days left to comment! New Local Plan Consultation closes on Thursday



There are few days left to comment on the draft New Local Plan.

The Regulation 18 consultation closes on 25 April at Midday.

- Visit our [website](#) to learn more
- Leave your comments via our [survey](#)

Make sure you get your comments to us before the deadline which is midday on Thursday (25th April). The New Local Plan will shape development across Harrow for years to come, so it is vital you have your say.

For further information, [explore our website](#). You can share your thoughts by [participating in our survey](#). You can also email us your thoughts to localplan@harrow.gov.uk and write to us (details below).

We have enjoyed meeting many of you over the last eight weeks. As a reminder once this consultation is over the Council will thoroughly review all the feedback we've received. Where appropriate we'll make adjustments to the proposed policies in the New Local Plan

based on your feedback. Later this year we'll hold another consultation on the updated version of the document, ensuring everyone has a chance to contribute to shaping our community's future.

Where can I find out more?

Read the draft [New Local Plan 2021-2041](#). A printed copy of this document is also available for public inspection in Harrow Libraries and at the Harrow Council Hub on Forward Drive by appointment. To make an appointment please email localplan@harrow.gov.uk

You can find out more about what is being proposed by visiting our [website](#).

Further details and the evidence base can be found on the [Harrow Local Plan Engagement Page](#)

We are keen to engage with all sections of the community, including those whose first language is not English. As a reminder, where requested we are able to provide assistance in translating documents into different languages.

How can you have your say?

- You can learn more and provide your feedback via our [**interactive Storymap**](#).
- Visit us at the '**Conversation Café**' every Tuesday during the consultation between 10am-3pm at St Peters Church, Sumner Road, West Harrow, HA1 4BX
- **Email** us at LocalPlan@Harrow.gov.uk
- Send us your **written comments** to New Local Plan, Planning Policy Team, London Borough of Harrow, Forward Drive, Harrow, HA3 8FL

Would you like to receive updates?

To sign up to the local plan mailing list, [Register for MyHarrow Talk](#).

For more information on how to participate in the consultation, please visit
www.harrow.gov.uk/newlocalplan

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Duty to Co-operate Meeting – Hertsmere BC and LB Harrow

22 April 2021 (MS Teams meeting)

Attending:

Mark Silverman (Hertsmere)
Rachel Marber (Hertsmere)
Andrew Stevenson (Hertsmere)
David Hughes (Harrow)
Duncan Ayles (Harrow)

Local Plan updates

- DH confirmed LBH is intending to publish Issues and Options at the end of the year followed by a staged consultation each year until public examination. A R18 draft Local Plan is anticipated in summer 2022. DA is leading on the preparation of an Infrastructure Delivery Plan.
- In relation to housing requirements, the London Plan target of 802 dpa compared to a figure of 2,538 dpa, the latter figure derived using the (retained) standard methodology (but including the 35% uplift for London / top 20 largest urban areas) announced in December 2020.
- DH advised that there was not expected to a need to identify green belt sites to accommodate the London Plan housing requirements. However, this is subject to the outcomes of the LBH Small Sites Capacity Study (sites less than 0.25 ha) due for completion in the next couple of months, since a large portion of Harrow's London Plan target is expected to come from such sites.
- MS advised timescales for HBC were about to be adjusted with a R18 draft plan expected to be issued for consultation in the autumn whereas the original timescale was to go straight to R19 in May. The housing requirement was 750 dpa compared to 266 dpa in the current Local Plan and green belt releases would be required to meet this level of housing need.
- DH advised that they do not expect to have to ask HBC to meet any unmet need; Hertsmere had previously contacted LBH in this regard and had received a response.
- Consideration needed to be given to how addresses on the other side of the administrative boundary would be notified of any Local Plan consultations. Presently, HBC will consult the neighbouring LPA but not individual addresses. MS advised that the resident who has contacted LBH regarding the Hertsmere Local Plan should contact local.plan@hertsmere.gov.uk and ask to be added to our mailing list. **Action: DH to advise local resident**

Infrastructure

- DH highlighted that TfL are proposing to redevelop Stanmore Station car park for residential, albeit with a limited amount of parking retained. MS requested details of where users of the station travel from as some of the sites being proposed in Bushey have the potential for improved public transport connectivity to Stanmore. **Action: DH/DA to forward Transport Statement**
- DH summarised the potential issues arising from growth in Bushey impacting on the supply/demand of secondary school places in the Bushey/Stanmore area. Although there was some capacity within secondary schools in LBH, the nearby Avanti House was oversubscribed. MS would ask Hertfordshire County Council to cover the relationship with schools in LB Harrow as part of their education strategy for the area. **Action: MS to raise with HCC**
- AS requested details of GIS layers for utilities. **Action: LBH to provide GIS layers**
- HBC will share the latest draft of its IDP, anticipated in the next week, when it is received: **Action: AS to share with LBH (and other neighbouring authorities)**
- LBH will share the West London Strategic Infrastructure Plan with HBC: **Action: DA to share**

Technical Studies

- LBH were about to commission a Green Belt assessment - the methodology should be similar to Hertsmere's study undertaken by Arup. MS asked that HBC be consulted on the methodology so that any potential issues could be highlighted. **Action: LBH to consult HBC on green belt methodology**

Gypsy and Travellers

- Around 25 pitches needed to be allocated in Hertsmere. DH confirmed that LBH do not need to provide any extra pitches or sites in their Local Plan review, an approach based on the West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (October 2018). It should be noted that the London Plan 2021 has a default figure of 8 pitches for Harrow, based on a pan-London exercise undertaken in 2008 but this requirement is only applicable if a more recent study has not been undertaken which is not the case in Harrow.

Date of next meeting:

- It was agreed that it would be useful to meet again later in the year, in around 6 months time. **Action: DH/MS to arrange**

Duty to Co-operate Meeting – Hertsmere BC and LB Harrow

10 October 2023 (MS Teams meeting)

Attending:

Mark Silverman (Hertsmere – Planning Policy Team Leader)

Gerard Woods (Hertsmere – Interim Strategic Planning Manager)

David Hughes (Harrow – Planning Policy Manager)

Harriett Noall (Harrow – Principal Policy Planner)

Notes: Harrow

Local Plan updates

- DH noted that there had been slippage in the Local Plan timeframes due to resourcing. There had also been a change in administration since the last DtC meeting, with the new administration keen to have a Local Plan in place before the next local elections in May 2026 (and also meet the Government's deadline of June 2025 for plans under the current system). LBH is therefore intending to publish one R18 consultation in February 2024 and subsequent R19 by the end of 2024.
- In relation to housing requirements, DH confirmed the intention to meet the London Plan target of 802 dpa. Identified capacity close to meeting this – formal call for sites to be held in parallel to the E18 consultation. It is anticipated that most of the capacity will be delivered within the Harrow and Wealdstone Opportunity Area, with the balance on smaller sites circa 300 dpa (compared to London Plan small sites target of 375 pa). Intention is to over allocate in the OA in order to reduce extent of capacity coming forward on smaller sites / suburban area in order to reflect administration's priorities.
- MS advised timescales for HBC were likely to be very similar to Harrow's as there had also been a change of administration in Hertsmere and they too were keen to have a Local Plan in place by May 2026. This would be reflected in an updated LDS to be considered in November 2023.
- HBC seeking to achieve the housing requirement of 750 dpa, but the administration is seeking to achieve higher densities within established urban areas in order to reduce the number of sites proposed to be released from Green Belt. It was noted that there had been a significant number of Green Belt sites coming forward in the interim through planning applications / appeals (including a number in the Bushy area near the Harrow / Barnet boundaries).
- It was noted there was strong demand for B2/B8 (particularly B8) in Hertsmere, including a number of Green Belt sites just near the tri-borough boundary (including an enabling development to support a reservoir). DH noted that Harrow had very modest industrial land / capacity and limited demand, which was anticipated to be accommodated within Harrow.

Infrastructure

- HBC noted that a Sustainable Transport Strategy was being prepared by the County Council; one of the proposals was for a bypass of Borehamwood. Work is also being undertaken in relation to walking and cycling within HBC. DH noted that Harrow had no Transport for

London strategic roads but had a Local Implementation Plan that informed the allocation of funding from TfL (in the context of the Mayor's Transport Strategy). HN noted that Harrow was preparing a Transport Strategy. **Action: DH to provide relevant Harrow contacts for any potential cross-boundary transport issues:** dalton.cenac@harrow.gov.uk (Interim Head of Traffic, Highways & Asset Management) and laura.mcintosh@harrow.gov.uk (Interim Transportation Manager)

- HBC noted that their IDP would be updated for R19 consultation. The County Council was still seeking a site for a new secondary school in the Watford / Bushy area but finding an acceptable site had proven difficult. The County was also seeking to progress the relocation (into Walford) and expansion of the Breakspeare School (an SEND school). HN noted that LBH had undertaken an initial scoping report for its IDP, which would inform R18 consultation, with the final IDP complete for R19 consultation. HN to raise Breakspeare School with education colleagues given need for SEND places in Harrow. **Action: LBH to send IDP scoping report to HBC.**
- HN noted that as part of the IDP work, the lack of planning / understanding of demand and supply balance for burial space had been identified. Given many burials occurred out of borough / joint facilities located outside of London were operated by London boroughs; it had DtC considerations. HBC suggested discussion with Dave Smith within HBC re any information / background he may have. **Action: HN to contact HBC re burial space.**

Technical Studies

- DH noted that in light of foreshadowed ability to meet Harrow's London Plan housing requirement within urban area and recent NPPF changes / Government announcements, the previously foreshadowed Green Belt review was not going to be undertaken.

Gypsy and Travellers

- HBC noted they would need to review some of the proposed site allocations but there was still an intention to meet need (using the broader definition that included cultural need). DH noted that Harrow also intended to meet need within Harrow.

Other

- First Homes – DH noted that there had been no proposals in Harrow, with the Mayor of London / London Plan discouraging First Homes in preference for social rent etc (i.e. greatest need). HBC noted schemes that had come forward were problematic to deal with.
- HBC noted three SPDs that were being progressed – Biodiversity Net Gain (BNG), carbon offsetting and car parking. HN shared work that had been done a pan-London level. **Action: HN to send study through to HBC**
- DH noted the boroughs comprising the West London Waste Authority were commencing and update to the West London Waste Plan (adopted 2015).
- HBC noted the joint Waste and Minerals Plan was being updated.

Date of next meeting:

- It was agreed that it would be useful to meet again later in around 6 months time. **Action: DH/MS to arrange**

Duty to Cooperate meeting (12.00: 15 May 2024)

Meeting Agenda.

1. Welcome/Introductions
Harrow- Renato Messere, Callum Sayers, Harriet Noall
Hertsmere- Mark Silverman, George Pavey
2. Purpose of the meeting – i.e. to discuss strategic planning matters and cross -boundary issues affecting the authorities
3. Update on status of respective local plans, SPDs etc.
Harrow- Reg 18 carried out 26 Feb- 25 April (strategic and DM policies, no sites at this stage)
Hertsmere – out for Reg 18 now (as 2021 was shelved/administrative change)
To be adopted end of 2025.

Noted that Hertsmere had sent comments on Harow Plan (23.4.24)
Harrow to respond on Hertsmere Plan by deadline (29.5.24).

4. Discussion points:
-National policy (LURA) and London Plan, review and SoS directions:
Noted that both authorities aim to submit by June 2025 before new plan arrangements start.
Whist Hertsmere not directly affected by London Plan, its neighbours are. SoS direction to increase housing supply particularly in opportunity areas (e.g. Harrow & Wealdstone) noted but not clear if/how London Mayor will address these, potentially as part of LP review.

-Policy matters including meeting housing, employment requirements:
Harrow- planning to meet London Plan housing targets 802pa and development generally with focus on H&WOA, and less so on suburbs. Industrial requirements for Harrow quite modest.

Query on Harrow's reliance on small sites allowance and reliance on London SHLAA 2017.
Harrow to update housing trajectory following call for sites exercise. Also noted that Harrow affordable housing policy to tested as part of local plan viability study.

Hertsmere – new Reg 18 document does not plan to be OAN as per previous version with resultant less incursion into the GB. Only around 75% to be met.
Less office space need but looking like an increase in B8. Awaiting the updated South-West Herts Economic Study that will estimate the required employment land for the plan period.

-Development proposals (strategic sites/close to boundaries, cumulative impacts-IIA)
Harrow Reg 18 contains no site allocation at present, but no new significant development planned close to borough boundary. Existing RNOH site in Stanmore, close to boundary is an existing allocation in GB. Masterplan exists to extend/upgrade facilities which serve a wider area- pragmatic approach supported.
Hertsmere- Development is spread across the borough with a new settlement at Bowmans Cross. Noted that several GB sites put forward in last consultation such as Heathborne Green – (near Stanmore hospital), to be removed from Hertsmere Draft Plan.

Nothing significant (housing) on the Bushey Heath Side.

Likely individual planning applications - between Elstree and Bushey:

Commercial applications (B8 – warehousing and distribution) – one 30000sqm (near Costco)

A41 – apparently a bus route.

Data centre now likely by Mecure Hotel

B2/B8 near reservoir (awaiting S.106 agreement)

Potential impacts on traffic onto M1/A41- it was noted that this could have some impact on Harrow to north-west and will need to be monitored as any development proposals come forward.

-Town centre development/regeneration

No specific issues identified. Masterplan to be produced for Harrow TC. Opportunity area will continue to be focus of development and regeneration.

-Infrastructure (health, transportation, education, cemeteries, open spaces, leisure etc)

-Gypsies and Travellers

Harrow plan to expand existing site at Watling Farm to take any further expected increase in pitches. Awaiting finalisation of London-wide GTAANA to set pitch requirements.

- Burial Space.
- Harrow burial space is becoming an issue. Will undertake work to identify needs and any potential sites, but a joint approach with adjoining authorities would be beneficial.

Only space in Hertsmere near Elstree – looking to acquire more land around it. Close to borough boundary so potentially could discuss with Herts parks department. Current site is nearly full. Likely to involve a CPO to acquire land next to the existing Allum Lane cemetery in Elstree but that process has not formally started yet. Contacts to be provided. [provided Post meeting- Head of Streetscene, Ian Kershaw (ian.kershaw@hertsmere.gov.uk)

-Evidence base including scope for joint studies

Harrow on-going SFRA2, IIA, IDP, Viability. Hertsmere SWH employment study. No real scope for joint work identified (other than burial space potentially).

-Other matters- e.g. Article 4 directions

Noted that Hertsmere introducing A4D for change of use from Class E to C3 in employment areas. Harrow contemplating but priority is local plan progression at moment.

5. Potential statements of common ground –
None specific at this stage to be contemplated.
6. AOB- no other matters raised.
7. Next steps – authorities to stay in contact. Harrow to respond to Hertsmere Reg 18 plan consultation.



Planning and Economic Development

Mr David Hughes
Planning Policy Manager
London Borough of Harrow
Civic Centre
Station Road
Harrow, HA1 2XY

Your Reference:
Our Reference: HLP/DTC
Contact: Mark Silverman
Extension: 4300
Date: 31 January 2020

Dear Mr Hughes

Hertsmere Local Plan

Hertsmere Borough Council is currently progressing work on its own Local Plan which will cover the period from 2018 to 2036.

As part of the duty to cooperate process, we have been actively engaging with all of our neighbours and stakeholders to consider how Hertsmere will meet its own identified housing and employment needs. The standard national methodology for assessing housing need has resulted in an annual requirement of 750 homes per annum (incorporating a 5% buffer, as required by the NPPF) or 13,500 homes over the plan period. By comparison, our current Local Plan which was adopted 2013, has an annual housing requirement of 266 homes. That Plan is now more than five years old and therefore deemed to be 'out of date' in determining our future strategic growth requirements.

We recognise that there is an agreement in principle to progress a joint plan for the South West Herts Housing Market Area, which would involve a comprehensive and comparative assessment of Green Belt land. Clearly this will not be in place in time to inform our new Local Plan and there remains a need for Hertsmere to bring forward this new plan without delay.

Following a [Call for Sites](#), we have consulted on a Potential Sites for Housing and Employment document which identified and summarised the site proposals initially put forward by landowners and developers. Hertsmere's current housing and employment land capacity is considered to be solely that which can be developed on previously developed land and includes all sources on land not covered by Green Belt designation. We also recognise that there is greater emphasis in the NPPF on making effective use of land (chapter 11) and maximising densities (chapter 13) as a preliminary requirement prior to assessing where Green Belt land might be taken and whether exceptional circumstances exist for doing so. Given these requirements and to ensure that previously developed land is maximised, we have set out to:

- 1) Review the housing densities and capacities of all potential sites located within major settlement boundaries, and applying a significant uplift in the average density of residential development in accordance with paragraph 123 of the NPPF.
- 2) Assess the utilisation of local vacant housing stock as a source of untapped brownfield housing supply.
- 3) Review the achievability and deliverability of Hertsmere's own land assets.
- 4) Contact owners/occupiers of major brownfields sites who have not yet submitted any of their land holdings.

Our Housing and Economic Land Availability Assessment (HELAA), published in 2019, points to a capacity of less than 2,500 homes on previously developed land. This includes an allowance for windfall development and existing commitments. We are hopeful that around two-thirds of our employment requirement of over 25ha of employment can be accommodated within land which has previously been safeguarded for such purposes in our current Local Plan.

There is therefore a very significant shortfall between the potential housing capacity of Hertsmere's previously developed land and the level of identified need, as well as a clear deficit of land required to meet employment needs over the plan period. As an authority with almost 80% of its area designated as Green Belt, we are therefore asking you whether your authority is able to accommodate some of the growth shortfall identified within Hertsmere. A similar request has also been sent to all neighbouring authorities and other authorities within our HMA.

We are intending to arrange a Duty to Co-operate workshop in due course to discuss our emerging plan and potential cross boundary issues arising, and will be in contact again with more details about this event. In the meantime, I would be grateful for a response to this letter at the earliest opportunity.

If you have any queries relating to the above request, please do not hesitate to get in contact.

Yours sincerely

A handwritten signature in black ink, appearing to read 'L Wood', with a horizontal line drawn underneath the name.

Laura Wood
Planning Strategy Manager

Community Directorate
Corporate Director – Paul Walker

Laura Wood
Planning Strategy Manager
Hertsmere Borough Council
Civic Offices, Elstree Way
Borehamwood, Herts
WD6 1WA

Wednesday, 19 February 2020
Our ref: PW/DH

By Email: Mark.Silverman@hertsmere.gov.uk

Dear Laura,

Re: Hertsmere Local Plan Review, Duty to Cooperate: Housing Need.
Your Ref: HLP/DTC

Thank you for your letter dated 31st January 2020 indicating that Hertsmere is in the process of reviewing its Local Plan. Harrow notes the content of the letter and acknowledges the difficulty faced by Hertsmere in meeting its full objectively assessed need (OAN) as set out by the MHCLG using the Government's Standard Methodology and work undertaken to date to identify means to reduce the shortfall between potential housing capacity and the OAN figure.

By way of context, the Government's Standard Methodology OAN figure for Harrow is 1,922 dwellings per annum (October 2018 methodology). The Strategic Housing Market Assessment (SHMA) for Harrow completed in 2018 (as part of the West London Sub-Region) identified an OAN figure of 1,480 dwellings per annum. Both of these OAN figures are substantially higher than the housing target for Harrow contained in draft New London Plan (December 2017), which proposed a target of 1,392 dwellings per annum. LB Harrow must meet its housing targets as set under the London Plan, as part of the Development Plan.

The West London Alliance (WLA) boroughs (including Harrow) objected to the targets in the draft New London Plan. Of particular concern was the level of housing that was anticipated to come forward through the small sites policy (Policy H2 & latterly H2A), which was based on a theoretical model rather than any historic windfall rates or assessment of the impact of draft Policy H2. Of the draft London Plan (2017) target of 1,392 dwelling per annum for Harrow, almost 70% was expected to be delivered by way of small sites developments (compared to 38% of the London-wide target).

Harrow / WLA submitted statements / evidence to the Examination in Public and attended hearing sessions on the small sites matter. The Panel of Inspectors provided their report and recommendations in October 2019. One recommendation was that the overall London and individual borough targets are reduced, due primarily to concerns over the small sites element of these. At a borough level, this would result in a decrease in the housing target for Harrow to 802 dwellings per annum. Harrow considers that this revised figure, whilst still challenging, is more realistic and achievable.

It is noted that the Mayor of London has accepted the lower targets recommended by the Panel of Inspectors in his Intend to Publish version of the London Plan. The revised target for Harrow however falls well below the OAN figures for the borough identified through the Government's Standard Methodology or the Harrow SHMA (2018). Given this and that the revised target for London overall would fall well short of the OAN figures for London, there is still uncertainty if the Secretary of State will accept the revised targets, with his decision on the draft New London Plan being delayed twice, with a decision now due on 16 March 2020.

It was noted within the Panel's report that recommendations were made to the Mayor of London on how to address the shortfall, which included a strategic London wide review of the Green Belt. In his response to the Panel's recommendation, the Mayor of London did not accept this recommendation, stating that the comprehensive review of the Green Belt would undermine the spatial strategy set out in the London Plan. Specifically, the Mayor of London considered that the strong emphasis on the green belt is considered

justified, among other things, to help prevent urban sprawl, driving the re-use and intensification of previously developed land to ensure the city makes efficient use of its infrastructure. Accordingly, the Green Belt review was rejected.

It is therefore still not clear as to what the final target for Harrow or other boroughs will be in the final published version of the New London Plan.

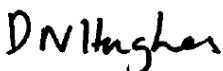
Historically, Harrow has had a strong housing delivery (for example, we achieved 175% in the first Housing Delivery Test and 169% in the recently published Second Test). However, the original draft London Plan (2017) figure of 1,392 dwellings per annum and the MHCLG figure of 1,959 dwellings per annum are significantly beyond what LB Harrow considers realistic under our current Local Plan or indeed, the proposed draft New London Plan policies.

Harrow has committed to review its Local Plan in light of the OAN figures identified above and the draft New London Plan target (as originally published). As part of this process we will seek to demonstrate how we can meet these figures, as required by the National Planning Policy Framework (NPPF). However, given the significant difference of these OAN figures relative to our current London Plan annual target (593) and that recommended by the EiP Panel (802), identifying how Harrow can meet the Government's OAN figure and/or the Mayor's original draft NLP target for the borough will be a significant challenge.

Therefore whilst Harrow seeks to work proactively and collaboratively with its neighbouring boroughs, in light of the above we consider that we are not in a position to assist with Hertsmere's OAN requirements.

Should you have any queries, please do not hesitate to contact David Hughes, Planning Policy Manager by email: david.hughes@harrow.gov.uk or by telephone: 0208 736 6082.

Yours sincerely

pp. 

Paul Walker
Corporate Director, Community



Planning and Economic Development

Renato Messere MRTPI IHBC
Local Plan Manager
Planning and Building
London Borough of Harrow
Forward Drive
Harrow
HA3 8FL

Harrow Local Plan (Regulation 18)

Your Reference:

Our Reference:

Contact: Mark Silverman

Extension: 4300

Date: 23 April 2024

Dear Mr Messere

Thank you for notifying and consulting Hertsmere Borough Council on the LB Harrow Regulation 18 "Initial Proposals" document. This response comes from the Planning Strategy team at Hertsmere Borough Council, and is an officer response only.

Spatial Vision, Objectives and Strategy

HBC officers support the overall Vision, Objectives and Strategy for the borough. However, we do have some concerns around the extent to which some of the key elements of the strategy, particularly the delivery of a minimum of 16,040 homes, have been justified. This is set out more fully below.

Strategic Policy 03: Meeting Harrow's Housing Needs

We note the intention to "optimise opportunities to deliver a minimum of 16,040 (net) homes during the Plan period" but it remains unclear how this would be delivered. Table H1 shows an indicative shortfall of 1,278 homes but the table does not appear to clearly set out provision for the allocation of any newly identified sites.

There is a significant reliance on both small sites windfall and implemented site allocations/preapplications, each amounting to around 25% of the total housing requirement. The small sites windfall is tied to the 10 year targets in the London Plan but we note that this is based on a London-wide SHLAA from 2017 which may not be sufficiently up to date or robust to justify this as the largest element of your housing supply.

The Regulation 18 Plan indicates that you are intending to undertake a further review of the evidence base to assess housing capacity. Should there be a shortfall in housing supply, we would expect LB Harrow to consider the extent to which exceptional circumstances may exist to justify the use of Green Belt land.

Strategic Policy 03: Meeting Harrow's Housing Need

We support the scope and ambition of this policy including the requirement that at least 70% of homes should be low cost rented housing. However, we would suggest that the policy could benefit from tightening up and where necessary, clearer justification.

The absence of any requirement to deliver First Homes, as part of the intermediate housing element, would appear to be contrary to national policy (paragraph 66, as well as the Written Ministerial Statement) and national planning practice guidance. We fully acknowledge, as set out in paragraph 4.4.4, that low cost rented homes are genuinely more affordable than First Homes (and shared ownership) products; however, we consider that the absence of any requirement for First Homes needs to be more robustly justified and at the very least, it should be clarified whether these will be accepted as a type of intermediate housing.

The viability section of the policy, as drafted, appears to provide greater scope than envisaged by the NPPF for Affordable Housing viability to be challenged by applicants. Paragraph 4.4.8 also states that the Council will undertake a Local Plan Viability Assessment “to provide an *indication* [emphasis added] of the amount, size, tenure of affordable housing that may be achievable” on sites. We would suggest that a stronger line is taken on requiring the on-site provision of Affordable Housing on the basis that the final requirements in Policy 03 are justified through your viability assessment, rather than simply providing an ‘indication’ of what is achievable.

Under Vacant Building Credit (VBC), the policy states that its application ‘is not appropriate in Harrow’. However, the policy then lists the VBC criteria where it will be applied. It is suggested that the policy is clearer around the application of the VBC.

Policy H06: Accommodation for older people

We welcome the requirement in c) to provide Affordable Housing in line with Policy C05 and are keen to ensure that the growth in this type of housing across outer London and Hertfordshire contributes to Affordable Housing wherever possible. We would suggest that greater clarity is provided in terms of what types of older persons’ housing, including self-contained housing units with support or care within C2 schemes, are required to provide Affordable Housing.

It is recommended that your Local Plan viability assessment also include an assessment of the viability of providing on or off-site Affordable Housing and/or contributions; we would be happy to discuss this further given that we are undertaking such an assessment at present. The different costs associated with specialist forms of private sector housing may mean a different and potentially lower quantum of Affordable Housing provision and this would need to be acknowledged in either Policy H06 or Policy 03.

Strategic Policy 04: Local Economy

The supporting text to Policy 04 indicates that your Economic Development Needs Assessment (EDNA) (2017) projects a requirement for 6,000 sq m of industrial floorspace. Given the reported significant loss of industrial floorspace reported in Harrow between 2000/1 and 2019/20 (143,000 sq m) and the relative age of the EDNA, pre-dating the Covid pandemic, we are concerned that the projected 6,000 sq m requirement may represent an under-assessment of B2 and particularly B8 land requirements. Hertsmere continues to experience a high level of demand for distribution and warehousing development and we would wish to ensure that neighbouring north London boroughs make adequate provision for B2 and B8 requirements during the plan period.

Policy G11: Green Belt and Metropolitan Open Land

We note that point A b states that “development adjacent to Green Belt should not have a significant detrimental effect on the openness of the Green Belt, and must respect the character of its surroundings.” We are concerned that such a policy would not be justified or consistent with the NPPF. Whereas the impact of development on the setting of certain heritage assets is an

important consideration, it is unclear how development adjacent to the Green Belt can or should be assessed in terms of its impact on Green Belt openness. Development of land outside of the Green Belt should not ordinarily be subject to the same tests as the development of land within the Green Belt.

The Royal National Orthopaedic Hospital is referenced in the support text and is located close to the borough boundary with Hertsmere, serving a much wider community. We would support a pragmatic approach to redevelopment within the site which upgrades the current facilities and building stock.

Policy GR6 Areas of Special Character

A large area of the north of the borough is identified as an Area of Special Character and this includes open areas adjacent to Bushey Heath. Part of Bushey Hill Pastures itself extends into Harrow as documented in our own published [Landscape Sensitivity Assessment](#) (Landscape Character Area – P.14). We support the overall scope of Policy GR6 and would suggest the supporting text acknowledges this important landscape extends into Bushey Heath.

Policy H10 Gypsy and Traveller Provision

We note the continued allocation of three pitches at the existing Watling Farm site which is located close to the borough boundary with Hertsmere and in a general vicinity, along the A41 corridor, where there are a number of other Gypsy and Traveller sites. Policy H012 clarifies that there is no additional capacity at Watling Farm. Although your previous GTANA found no additional need for new pitches in Harrow, it is important that neighbouring London Boroughs take account of the needs of all Gypsy and Travellers (under the reinstated definition). We would expect the findings of the GLA's updated assessment to inform the next iteration of your Local Plan and should additional pitches/sites need to be found, we would want to ensure that sites are appropriately distributed across a wider area, taking account of the proximity of nearby sites in Hertfordshire.

If there are any queries regarding this letter, please do not hesitate to get in contact.

Yours sincerely



Mark Silverman
Principal Planning Officer