



**EXAMINATION OF THE HARROW LOCAL PLAN 2021-
2041**

HEARING STATEMENT

**MATTER 2: THE VISION AND SPATIAL STRATEGY,
INCLUDING STRATEGIC POLICIES**

ISSUE 3

5 June 2025

Matter 2 The Vision and Spatial Strategy, including Strategic Policies

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

Questions:

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

- 3.1.1 Subject to the examination timetable and the draft Plan being found sound, the policies in the Plan are expected to be adopted in December 2025 (at the latest) as set out in the Local Development Scheme (CSD09). The Local Plan period ends on 30th March 2041 which equates to 15.25 years after the expected adoption date.

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

- 3.2.1 Yes, and the Mayor has confirmed this in their response to the Proposed Submission (Regulation 19) consultation (Rep 201), and subsequent Statement of Common Ground (LBH/ED13).

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

- 3.3.1 The Council strategic policies in the Plan cover the strategic priorities for the area. The policy framework includes 11 strategic policies (including the spatial strategy), from which the remaining policies flow. This includes 31 detailed site allocations, which by virtue of them allocating growth, are strategic policies; and 52 non-strategic development management policies. The structure of the plan, based on thematic area with at least one strategic policy and several non-strategic (development management) policies means that the Council considers that the strategic policies are comprehensive in their coverage and cover the strategic priorities of the area.

Thematic Policies		
Chapter	Strategic Policy	Development Management Policy (non-strategic policies)
1	Spatial Strategy	
2	SP01	GR1, GR2, GR3, GR4, GR3A, GR3B, GR4, GR4A, GR5, GR6, GR7, GR8, GR9, GR10, GR11, GR12
3	SP02	HE1, HE2
4	SP03	HO1, HO2, HO3, HO4, HO5, HO6, HO7, HO8, HO9, HO10, HO11, HO12

Thematic Policies		
Chapter	Strategic Policy	Development Management Policy (non-strategic policies)
5	SP04, SP05	LE1, LE2, LE3, LE4, LE5
6	SP06	CI1, CI2, CI3, CI4,
7	SP07	GI1, GI2, GI3, GI4, GI5
8	SP08	CN1, CN2, CN3, CN4, CN5
9	SP09	CE1, CE2
10	SP10	M1, M2, M3
Chapter	Detailed Site Allocations (Strategic Policies)	
11	OA1, OA2, OA3, OA4, OA5, OA6, OA7, OA8, OA9, OA10, OA11, OA12, OA13, OA14, OA15, OA16, OA17, GB1, GB2, O1, O2, O3, O4, O5, O6, O7, O8, O9, O10, O11, O12, O13, O14, O15, O16, O17, O18, O19, O20, O21, O22	

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

3.4.1 It is noted that there are two references to “1,000 additional jobs” within the Spatial Strategy policy box. One is a borough-wide figure, and one is specific to the Opportunity Area:

1. The first reference of “over 1,000 additional new jobs” relates to the whole borough. This is set out alongside the borough-wide housing target.
2. The reference to simply “1,000 additional new jobs” relates specifically to the Opportunity Area. This is set out alongside the housing target for the Opportunity Area.

3.4.2 There is an expectation that new economic development and job creation will occur outside the Opportunity Area, including on mixed-use sites within and around District and Local Centres, and through the intensification of the borough’s stock of industrial land. The policies for achieving this are set out in Chapters 2 & 5 of the plan.

3.4.3 It is noted that paragraph 11a of the NPPF 2023 requires strategic policies to provide for objectively assessed needs for housing and other uses (such as employment). The Council’s employment evidence base expresses such a need in terms of floorspace / land area and this is reflected in Strategic Policies 4 (Local Economy) and 5 (Harrow & Wealdstone Opportunity Area).

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

- 3.4.1 Yes, the spatial distribution of development based on relevant and up to date evidence and the distribution of development proposed will promote sustainable patterns of development in accordance with both national policy and the London Plan.
- 3.4.2 Development is primarily focused within the Harrow & Wealdstone Opportunity Area, with just over half of the housing anticipated to come forward during the plan period identified through site allocations within the area. This is the part of the borough with the highest existing levels of services, jobs, and public transport, and represents the most sustainable location in the borough. It also represents an opportunity to regenerate the borough's Metropolitan Town Centre (one of 14 in London), and to address local deprivation issues.
- 3.4.3 The focusing of development within the Opportunity Area is in line with the spatial objectives of the London Plan, which identifies such areas as 'London's principal opportunities for accommodating large scale development to provide substantial numbers of new employment and housing' (Glossary 3).
- 3.4.4 Other allocations outside the opportunity area (Sites O1-O22) are located within the urban area on underutilised brownfield sites, which also accords with the London Plan.
- 3.4.5 Additionally, a positive approach to the delivery of small site (windfall) development, including geographic criteria is set out in Policy HO3, and modelled in accordance with Policy H2 of the London Plan.
- 3.4.6 These two sources of development capacity account for just under half of the housing anticipated to come forward and are considered to represent sustainable locations with respect to national and regional policy.
- 3.4.7 Key evidence base documents supporting this distribution of development include the Local Housing Needs Assessment (EBH02), Economic Needs Study (EBLE01), West London Employment Land Review (EBLE03) with respect to need and the level of development required, Infrastructure Delivery Plan (EBIT01) (for infrastructure required to support the pattern and level of development, Site Selection Methodology (EBH01) (to determine locations / sites to accommodate the level of development having regard to site suitability, availability and deliverability), and the Integrated Impact Assessment (CSD03), which considered the sustainability of the Plan including the spatial distribution of development.

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

3.5.1 Yes, as it shows broad locations for development, such as the opportunity area, town centres and industrial / employment areas.

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

3.6.1 Some allocated sites have been carried over from the 2013 plan into the new Local Plan. This is a reference to them continuing on the new Policies Map as well as the 2013 policies map.