

Independent Examination of the Harrow's New Local Plan 2021-2041

Matter 2: The Vision and Spatial Strategy,
including Strategic Policies

STATEMENT ON BEHALF OF TAYLOR WIMPEY STRATEGIC LAND (REF. 307)

June 2025

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.

Q3.1 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?

1. If the Plan is adopted before 31st March 2026, it would cover a period of 15-years and conform to paragraph 22 of the National Planning Policy Framework¹ ("the Framework"). However, if modifications are required for the Plan to be found sound, it may not be adopted before 31st March 2026 and, therefore, an additional year would be required.
2. Notwithstanding the above, it is important that the relationship between the strategic policies set out within the Plan and those set out within the London Plan is clearly defined, noting that paragraph 16f of the Framework states that there should not be unnecessary duplication of policies. This should also be considered in the context of the status of the London Plan – discussed further in response to Q3.2, below – particularly with respect to housing targets / requirements.

Q3.2 Has the Plan been prepared to be in general conformity with the Spatial Development Strategy (the London Plan)?

3. To appropriately consider the general conformity of the Plan with the London Plan, the position of the London Plan must be recognised.
4. The London Plan was adopted in March 2021, so will be five years old in March 2026. In accordance with Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and paragraph 33 of the Framework, the London Plan requires a review before March 2026. The Greater London Authority (GLA) has accepted that the London Plan requires a review to take into account changing circumstances, particularly with respect to housing delivery, with a consultation on 'the next London Plan' running to the 22nd June 2025.
5. As documented at the end of this Statement, a recent statement by the Mayor of London indicates that the approach being taken by the Plan is at complete odds with the GLA's aspirations with respect to housing delivery in London.

¹ Noting that the Plan is to be examined against the provisions of the December 2023 version of the Framework, in accordance with the transitional arrangements outlined at paragraphs 234 and 235 of the December 2024 version of the Framework.

6. It is also important to note that the London Plan was adopted despite it being recognised to suppress housing delivery across the capital and with a requirement for it to be reviewed immediately². Further, the housing figures for each London Borough are expressed as 'targets' as opposed to 'requirements' or 'needs'. This is a critical distinction when assessing the soundness of the Plan against the provisions of the Framework, as discussed further in our Matter 5 Statement.
7. In terms of housing delivery, it must be recognised that simply conforming to the London Plan housing *target* would result in a substantial shortfall against the minimum Local Housing *Need* ("LHN") identified for the London Borough of Harrow ("LBH"). This, and the subsequent implications, are detailed further within our Matter 5 Hearing Statement, and it is evident that such an approach means that the Plan cannot be considered to be positive prepared in accordance with paragraph 35 of the Framework.

Q3.5 Is the spatial distribution of development based on relevant and up to date evidence and in what way would the distribution of development proposed promote sustainable patterns of development in accordance with both national policy and the London Plan?

8. No, the spatial distribution of development proposed is not based on relevant and up-to-date evidence.
9. As discussed in greater detail in our Matter 5 Statement, there is a critical distinction between the London Plan housing *targets* and the minimum Local Housing *Need* ("LHN"). In accordance with paragraph 35a of the Framework, local plans are required to meet needs, with the Planning Practice Guidance states that the minimum LHN figure is fixed at the time that a Local Plan is submitted for Examination³ – February 2025 in the case of the Plan. The Plan does not acknowledge this position, and its spatial distribution is not based on meeting the minimum LHN.
10. Furthermore, as outlined within our Regulation 19 representations in relation to Strategic Policy 03⁴, the spatial distribution of development is not based on identifying sites that are capable of delivering the type of homes that are required to meet needs. Notably, the spatial distribution does not respond to the significant need for family housing that is identified by the Updated Harrow Local Housing Needs Assessment 2024⁵.
11. Finally, it is notable that the Plan's approach with respect to the spatial distribution of development – focusing only on brownfield development and immediately ruling out site options in the Green Belt – conflicts with the Mayor of London's current position. As part of the process of announcing the consultation on the 'Next London Plan', the Mayor of London stated on the 9th May that (inter alia):

² Please note paragraphs 8-11 of our Regulation 19 representations in response to Strategic Policy 03

³ Paragraph ref. ID: 2a-008-20241212

⁴ Notably paragraphs 64-80

⁵ Document reference EBH02

"We'll be working with councils and others to secure as many new homes as we can on brownfield sites, both large and small, but we have to be honest with Londoners that this alone will not be enough to meet our needs."

"That's why I'm announcing that City Hall's new position will be to actively explore the release of parts of London's green belt for development."

(Emphasis added)



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