

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

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

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

June 2025

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

### The SA and the Approach to Site Selection

#### Q4.9 The Site Selection Paper (EBH03) identifies the approach adopted to site selection throughout the Plan. Have the individual site allocations been chosen according to a robust site selection methodology?

1. No.
2. Table 1 of the Council's 'Site Selection / Allocation Methodology' document (document ref. EBH03) sets out the 'Site exclusion criteria'. Top of this table is 'Green Belt and MOL', and the justification for excluding these sites from assessment is as follows:

*"Development of the Green Belt or Metropolitan Open Land would be inconsistent with the London Plan and Council's draft spatial strategy. Furthermore, it is considered that exceptional circumstances for allocation of green belt sites for development do not exist."*

3. Paragraph 11.9a) of the Plan also outlines that sites in the Green Belt and Metropolitan Open Land ("MOL") were immediately excluded.
4. This assertion is entirely at odds with the assessment of the London Plan, with a relevant extract of the Examiners' Report<sup>1</sup> provided below:

*"Furthermore, the question of supply is based on capacity and given that this would be maximised as far as realistically possible **it is difficult to see how the number of deliverable housing units could be increased without consideration being given to a review of the Green Belt** or further exploration of potential with local authorities within the wider South East. This would all take time and in our view it is better to proceed on the basis of an adopted plan rather than one that is in limbo."*

*(Emphasis added)*

5. This also conflicts with the approach set out in the consultation draft of the 'Next London Plan' (May 2025) and recent statements issued by the Mayor of London (relevant extracts included within our Matter 2 Statement).

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<sup>1</sup> Dated 8<sup>th</sup> October 2019

6. The immediate discounting of sites in the Green Belt and MOL from assessment is not justified and has skewed the site selection process.
7. As demonstrated in our Regulation 19 representations to Chapter 11 – Site Allocations, this has adverse impacts with respect to the delivery of the type of homes that are needed within the London Borough of Harrow – based on the Council's own Updated Housing Needs Assessment 2024<sup>2</sup> – in addition to the quantum of homes. Further, it does not even facilitate meeting the 25% target for all new homes to comprise family housing set out in Policy HO1.
8. Noting that paragraph 63 of the Framework<sup>3</sup> requires the housing needs of the community to be reflected in planning policies, the Plan is unsound in accordance with paragraph 35d of the December 2023 version of the Framework. It is also unsound in accordance with paragraph 35b given that it is not justified and paragraph 35c as the target set by Strategic Policy 03 and Policy HO1 with respect to family housing cannot be delivered.
9. Notwithstanding points raised within our response to Matter 5 regarding the significantly suppressed housing target and the proportion of family homes required within the LBH, if the Plan is to deliver against the 25% family homes requirement, a review of the site-selection process is required, and the Plan must allocate sites that can feasibly deliver family homes.
10. Sites of a sufficient scale that would feasibly ensure that appropriate densities can be achieved to deliver family homes and where meaningful amounts of affordable homes can be delivered – i.e. Green Belt sites – must be appropriately considered as opposed to immediately excluded, as per the approach that has been taken.

#### **Q4.10 Are the allocated sites identified at Chapter 11 of the Plan and mix of uses proposed justified and in what way do they reflect the outcomes of the SA and testing of reasonable alternatives through the site selection methodology?**

11. As outlined in our response to Q4.9, the allocated sites are not justified as the site selection process is underpinned by the unjustified decision to exclude all Green Belt sites promoted to deliver new homes. This has, consequently, resulted in a spatial strategy that relies upon very high densities to meet the suppressed housing need set by the Plan<sup>4</sup>.

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<sup>2</sup> Document ref. EBH02

<sup>3</sup> 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.

<sup>4</sup> Noting that this is substantially lower than the minimum Local Housing Need – see our Matter 5 Statement

**Q4.13 In terms of the site assessment and selection, paragraph 11.9 of the Plan advises that sites in the Green Belt or Metropolitan Open Land were excluded. This statement also appears within EBH03 however this statement does not appear to be correct in relation to the inclusion of sites GB1 and GB2? Could the Council please explain how the approach to sites within the Green Belt and Metropolitan Land has been consistently applied through the site selection methodology?**

12. Despite having excluded all Green Belt sites from assessment the Plan has subsequently allocated two Green Belt sites. However, the circumstances of each of these sites means that the Plan is not required as a means to establish the principle of their respective developments in planning policy terms.
13. The Council's Site Selection / Allocation Methodology document (document ref. EBH01) identifies that site GB1 has already benefitted from a planning permission, so the Plan is not required to establish the principle of the development of this site<sup>5</sup>. Moreover, the Site Selection document also identifies that site GB2 is an existing allocation in the Harrow Core Strategy<sup>6</sup>, so also does not require the Plan to establish the principle of its development.
14. In summary, the Plan does not provide a planning policy basis to establish the principle of developing the two Green Belt sites that are included as allocations given that this has already been established by planning permissions or allocations.

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<sup>5</sup> See criterion a) at the bottom of page 48 of document EBH01 – planning permission ref. P/3191/12

<sup>6</sup> See criterion b) at the top of on page 49 of document EBH01 – Allocation ref. G05 in the Site Allocations Development Plan Document (document ref. ADLP04)



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