

London Borough of Harrow Local Plan (2021 – 2041) Examination in Public

Week 1: Matter 3

Hearing Statement

prepared by CarneySweeney

on Behalf of Barwood Land

Date: 4th June 2025





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Issue Date:	4 June 2025	Revision Number:	B



1.0 Introduction

- 1.0.1 CarneySweeney act on behalf of Barwood Land, who own land in the London Borough of Harrow. They are concerned that the housing strategy within the Regulation 19 Harrow Local Plan (2021 – 2041) is unsound and as such made representations to that end in December 2024 (Council reference 311), to which the Inspector is referred.
- 1.0.2 This Statement sets out Barwood Land's position on Matter 3: 'Plan Viability, the SA and the approach to site selection', specifically Issue 4 as defined by the Inspector; namely: *Is the Plans approach to viability, the SA and site selection justified and effective?* In particular, it responds to the Inspector's questions 4.11 and 4.12, detailed further below.
- 1.0.3 This Statement should be read alongside our further Statement submitted in relation to Matter 5.



2.0 Matter 3, Issue 4: Is the Plans approach to viability, the SA and site selection justified and effective?

4.11: Does the evidence demonstrate that there is a realistic prospect that each of the allocations will be deliverable in the Plan period? If this is not the case, is the allocation justified?

- 2.1.1 Our response is 'No', the plan has not been positively prepared as a significant number of the proposed allocations do not meet the Appendix 2, NPPF definition of a deliverable site namely:
- a. sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
 - b. where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.
- 2.1.2 Further clarification is set out in PPG Housing Supply and Delivery (paragraph: 007 Reference ID: 68-007-20190722).
- 2.1.3 In order for the plan to be considered sound, there should be sufficient housing allocations to meet the LHN for the full plan period, plus an additional contingency of allocations to take account of any unforeseen circumstances whereby an allocated site does not come forward (NPPF para. 78).
- 2.1.4 The plan relies on a number of sites which would need to be deliverable over the 1 – 5-year period to meet its housing requirement. These sites consist of those proposed to be allocated without planning permission, some with current planning permissions and a windfall allowance for small sites.
- 2.1.5 We have carried out a review of the proposed allocations covering the 1 – 5-year trajectory. Table 1 below identifies those sites where, in our view, the definition of a deliverable site as set out in the NPPF is not met, as set out above in para. 2.1.1. In particular, where in our view there is no clear evidence that such sites will be deliverable during the plan period.



Site	Application Ref	1- 5 Year Trajectory	Comments	Amount to be Deducted
Allocated Sites				
Havelock Place (OA4)	No Applications	294	No active or extant planning permission. The site was allocated in the Harrow & Wealdstone Area Action Plan (AAP) (2013)	-294
Poet's Corner & Milton Road (OA9)	PL/0501/25 (Full Planning Application)	1064	Application awaiting determination for c.1,064 dwellings. The site was allocated in the Harrow & Wealdstone AAP (2013). Estimated that only c.200 units will be delivered during the 1 – 5-year period.	-864
Wealdstone Probation Office (OA10)	No Applications	70 (C2 Units)	No active or extant planning permission.	-70
Byron Quarter (OA14)	PL/2611/24 (Full Planning Application)	220	Application for 220 units awaiting determination. The site was allocated in Harrow & Wealdstone AAP (2013) Based on a delivery of 3 units/month 144 plot could be delivered in the 1 – 5-year period if the current planning application is granted.	-76
Iceland Wealdstone (OA15)	No Applications	25	No application has been submitted and no extant permission.	-25
Kodak (OA16)	P/2165/15 (Outline Application) & P/3944/19 (Full Planning Application)	2407	Development of the site has already commenced. Allocated Site in the Harrow & Wealdstone AAP (2013) Proposed modifications by the Council, have refined the delivery of dwelling in the 1 – 5-year period to 1,690. Therefore, the additional dwellings deducted.	-717
Former Kodak Administration Offices (OA17)	PL/1152/24 (Full Planning Application)	120	Application awaiting decision for 223 co-living units. Allocated site in the Harrow & Wealdstone AAP (2013). No amount deducted assuming that Planning Permission is granted in 2025.	-0
Grange Farm (O4)	No Applications	300	Council Estate Regeneration Project. Awaiting submission of application for phases 2 & 3. Phase 2a application anticipated shortly, which will deliver 45 units in the 1–5-year period.	-255
Vernon Lodge (O14)	No Applications	56 (Older Persons Accommodation)	No planning application or extant permission.	-56



Travellers Rest, Kenton Road (O16)	PL/0378/25 (Full Planning Application)	109	Live application, due to be determined July 2025 for 109 residential units and 103 co-living units. If the application is granted 50% (106 units) could be delivered in the 1 – 5-year period.	-3
Anmer Lodge (O21)	P/0412/14, P/1647/21 PL/1756/24 (Full Planning Applications)	141	2014 and 2021 permissions have now lapsed. Allocated site in the Harrow & Wealdstone AAP (2013). Only 2024 permission for 7 dwellings is deliverable.	-134
Small Sites Windfall				
No. of Sites not confirmed	N/A	375	Sites not listed, no evidence provided.	-375

Table 1: Review of proposed allocations in 1 – 5-year trajectory

2.1.6 For the proposed allocations to be deliverable in accordance with the NPPF definition as set out above in para 2.1.1, there must be clear evidence that the proposed allocations will come forward. The Council’s own evidence submitted with the plan showed some constraints and the renewal of old Local Plan 2013 allocations that have not been delivered. Several sites do not have a live planning application or have planning permissions which have lapsed. These sites are highlighted in the table above but include:

- Havelock Place (OA4)
- Poets Corner & Milton Road (OA9)
- Byron Quarter (OA14)
- Kodak (OA16)
- Former Kodak Administration Offices (OA17)
- Anmer Lodge (O21)

2.1.7 For the above reasons, the Council falls considerably short of the ‘clear evidence’ required to demonstrate deliverable sites for the dwellings outlined in Table 1 above.

2.1.8 There are a total of 2,869 dwellings proposed to be allocated that do not comply with the NPPF definition of a deliverable site. These sites must be discounted from the Council’s 5-year housing land supply. The omission of these dwellings results in the Council being unable to demonstrate a sufficient supply of housing.



2.1.9 The consequence of at least 2,869 dwellings failing to meet the NPPF definition of a deliverable site is that the plan has not been positively prepared.

4.12: With regards to the sites that will be delivering in years 1 – 5 of the Plan period, are the timescales identified justified by the evidence base?

2.1.10 Our response is 'No' because, as outlined in Table 1 above and our response to question 4.11, many of the proposed site allocations for years 1 – 5 are not justified by the evidence base.

2.1.11 The plan would not meet the definition of 'sound' as outlined in the NPPF, as the delivery of sites is not justified, and is not based on proportionate evidence.

