

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

Matter 4: Environment, Green Infrastructure
and Social and Community Infrastructure

Environment

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

June 2025

Issue 5: Are the Plan's policies which address the Environment, Green Infrastructure and Social and Community Infrastructure justified, positively prepared, consistent with national policy and in general conformity with the London Plan

Q5.11 How does the wording of the policy, which put the onus on new development proposals to demonstrate that adequate infrastructure capacity exists, relate to the role and function of the Council and the IDP as identified at paragraph 6.0.1 and 6.0.2 of the Plan?

1. The Infrastructure Delivery Plan ("IDP") identifies existing infrastructure capacity issues in relation to the following:
 - Significant shortfalls in primary school places, particularly within the Central Harrow area, up to 2034.
 - A continued rise in demand for specialist provision for children with Special Educational Needs and Disabilities (SEND), indicating that additional capacity is required borough wide.
 - Current health provision is currently experiencing significant capacity issues and existing health infrastructure is unable to support new housing developments without appropriate mitigation measures being secured.
 - An existing shortfall in Community Halls.
 - While the London Borough of Harrow currently has some sports and leisure facilities, there may be gaps in terms of capacity, accessibility, and inclusivity.
2. Given the existing infrastructure capacity issues identified in the IDP, the onus will be on development proposals to deliver infrastructure on or off site to meet the requirements of Strategic Policy 06.
3. However, as set out in our Regulation 19 representations to Strategic Policy 06, there are issues with this approach as the proposed site allocations are focussed on high-density development in town centre locations which are not capable of delivery infrastructure facilities to serve the increased population growth and are more likely to exacerbate existing issues and put additional strain on essential services.
4. As such, the spatial strategy will need to be amended to allocate additional sites capable of delivering required infrastructure facilities including sites that are located within the Green Belt.

Policy GI2: Open Space

Q5.32 Is the evidence base which supports this policy up to date?

5. The evidence base supporting Policy GI2 is not up to date.
6. There has been no recent assessment of open space in Harrow and, therefore, the IDP considers and summarises the findings from the Open Space PPG17 Study dated 2010.
7. Therefore, it is clear that the IDP fails to sufficiently consider the growing demand for green and open spaces resulting from the proposed population growth in the Borough.
8. As per paragraph 102 of the December 2023 version of the National Planning Policy Framework, policies should be based on robust and current assessments, and the IDP fails to meet this requirement.
9. Furthermore, as identified in our Regulation 19 representations in relation to Policy GI2, the Plan's reliance on brownfield sites and on smaller sites, many of which cannot support the provision of adequate open space, undermines its ability to meet its own strategic objectives related to public open space and community facilities.



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