

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

Matter 5: Meeting the Boroughs Housing
Needs, Affordable Housing and Other Matters

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

June 2025

Issue 6: Whether the Plan has been positively prepared and whether the approach to addressing housing needs is justified, effective and consistent with national policy

Strategic Policy 03: Meeting Harrow's Housing needs

Q6.1 The Plan states that the housing need for the Plan period (2021-2041) is 16,040 homes. This figure is based on the London Plan target as identified for the first 10 years of the Plan, with a London Plan target of 802 dwellings per year being rolled over into the last 10 years of the Plan. A number of representations have raised concerns that this does not represent a sound approach. Are these concerns valid and is this approach justified?

1. The approach used is not justified.
2. It is critical to recognise that the London Plan does not identify housing *needs* for each London Borough. It identifies housing *targets* that are based on land availability as opposed to needs; this is set out clearly at paragraph 4.1.7 of the London Plan, with the relevant extract quoted at paragraph 13 of our Regulation 19 representations to Strategic Policy 03.
3. Therefore, the London Plan does not include a strategic policy that identified a housing requirement or need for the London Borough of Harrow ("LBH"). On this basis, the Plan cannot rely on conformity with the London Plan to justify a housing *need* position for the Plan period that is very substantially lower than the minimum Local Housing Need ("LHN") derived via the Standard Method for the LBH – which, at the time that the Plan was submitted (February 2025), amounted to 2,294 dwellings per annum, or 34,410 dwellings over the minimum 15-year Plan-period. For context, this is 286% higher than the London Plan housing *target* for the LBH.
4. Paragraph 35a of the National Planning Policy Framework¹ ("the Framework") requires Local Plans to "*provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs*" (emphasis added). The London Plan is clear that the housing figures provided are targets based on land availability; therefore, as drafted, Strategic Policy 03 of the Plan would set the housing requirement for the LBH. Accordingly, the soundness of Strategic Policy 03 must be fully examined in the context of the requirement of paragraph 35a of the Framework.
5. Notwithstanding the above, as outlined within our Matter 2 Statement, it is also important to note the status of the London Plan, particularly in relation to housing numbers, in the context of assessing whether it is appropriate for the Plan to simply

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.

conform to it. The London Plan was allowed to be adopted despite its housing targets being substantially below the housing need at the time on the condition that it would be reviewed immediately, which has not happened. Further, 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 strategic policies of the London Plan require review by March 2026 in any event to be considered up to date.

6. Therefore, there is a prospect that the Plan may not reach adoption before the strategic policies of the London Plan are out-of-date, and even if it is adopted before March 2026, it would very quickly be based on out-of-date requirements. Notwithstanding the point that we make that the London Plan does not contain any strategic policies with respect to housing requirement / need, even if it did it would not be appropriate for the Plan to simply meet these in the context that they will be out-of-date within 8-months of the Hearing Sessions to examine the Plan (and, potentially, before the Plan is even adopted).
7. The Greater London Authority ("GLA") has published a consultation document with respect to the 'Next London Plan', which is subject to consultation until 22nd June 2025. Paragraph 1.3 of the Next London Plan identifies a housing *need* in London of 87,992 new homes per year, which dwarfs the adopted London Plan annual housing *target* of 52,287.
8. The Plan significantly conflicts with the direction of travel for the delivery of housing in London, and the current position will become out-of-date in March 2026 (less than 8-months following the conclusion of the hearing sessions to examine the Plan).
9. Furthermore, the adopted London Plan housing *targets* are based on a 10-year period 2019/20-2028/29. The Plan is due to cover the period up to 2041, so the housing target / requirement would need to cover a further 12-year period that is not covered by the adopted London Plan *target* for the LBH. The decision to 'roll over' the London Plan housing target for the last 12 years of the Plan period (up to 2041) is entirely unjustified, particularly in the context of the minimum LHN for Harrow and London, which outstrip the respective London Plan housing *targets*, and the change in approach being proposed through the consultation document on the 'Next London Plan'.
10. The implications of the Plan being adopted with Strategic Policy 03 setting an entirely unjustified housing need figure are severe. Our Regulation 19 representation to Strategic Policy 03 identify the significant adverse impacts associated with the suppression of housing delivery against housing need² - most notably in relation to housing affordability and sustainable commuting patterns - and these implications were also recognised through the examination of the adopted London Plan³.
11. Without modifications, Strategic Policy 03 would set the housing requirement for the purposes of calculating the LBH's housing land supply position for a further five year period from adoption (likely 2026-2031) in accordance with Planning Practice Guidance⁴. Even on its adoption in 2021, the London Plan was accepted to not get anywhere close to meeting

² Paragraphs 34-46

³ Paragraphs 8 and 9 of our Regulation 19 representations to Strategic Policy 03

⁴ Paragraph ref. ID: 68-005-2019

housing needs across London (including within the LBH), and despite the GLA seeking to resolve this through the preparation of the 'Next London Plan', the adoption of the Plan (as drafted) would restrict the much needed increased housing delivery within the LBH on the basis of an out-of-date position that is based on land availability and not housing needs. This is because there would be no planning policy framework to facilitate the delivery of much needed new homes, including of the type that the LBH has identified are needed within the Borough, beyond the suppressed level provided for by the Plan until at least 2031 as the Plan's policies with respect to growth beyond existing areas would be up-to-date for the purposes of decision-making in accordance with the paragraph 11d of the Framework.

12. This would significantly restrict the ability to secure planning permission for developments that are consistent with the provisions of the Framework to boost the supply of housing and deliver the homes that are needed (both in terms of quantum and typology), such as through utilising the new Grey Belt provisions.
13. The trade-off to allowing the continued suppression of housing delivery in the LBH would be the allocation of brownfield sites in the Borough. It is important to note that a significant amount of the housing supply set out within the Plan already benefits from planning permissions or where the principle of development would be supported by the adopted Harrow Local Plan and the Framework, including the proposed redevelopment of the Royal National Orthopaedic Hospital (site reference GB1) and the Gypsy and Traveller Pitches at Watling Farm (site reference GB2) that are in the Green Belt.
14. Accordingly, the adoption of the Plan, as drafted, will not unlock the delivery of any housing in the LBH as the housing that is allocated could be delivered without the provisions of the Plan (and much of which is being delivered under existing planning permissions in any case)⁵. Instead, it will simply prolong the suppression of housing delivery within the LBH in a manner that is inconsistent with the Government's key objective with respect to housing delivery and the approach being taken by the 'Next London Plan'.
15. In summary, the Plan's approach with respect to housing need is not justified and could have severe consequences with respect to housing affordability within the LBH.

Q6.2 Is the mix of housing identified at part 5 of the policy justified and supported by robust evidence?

16. No.
17. The February 2024 Updated Local Housing Needs Assessment ("LHNA")⁶, document ref. EBH02, identified that there is a need of 48.7% for 3-bed dwellings and 19.8% 4+ bed dwellings based on the total need of 24,266; or a need of 54.5% for 3-bed dwellings and 23.7% 4+ bed dwellings based on a total need of 16,040 homes; over the period up to 2041. However, part 5 of the Strategic Policy 3 only sets a target of 25% for family-sized dwellings (3 or more bedrooms), which is significantly below the need identified by the evidence that supports the Plan. This substantial gap between the policy

⁵ Please see our response to Q4.13 within our Matter 3 Statement with respect to the existing policy / planning permission positions with respect to sites GB1 and GB2

⁶ Figure 4 and 5 of the Local Housing Needs Assessment 2024

target and the evidence-based housing need indicates that the approach is not sufficiently addressing the identified need for family homes and that the Plan is not justified.

18. Further context with respect to the implications of the approach taken by the Plan with respect to delivering the type of homes that are needed in the LBH is set out in our Regulation 19 representations to Strategic Policy 03⁷ and to Policy HO1.

Q6.3 How will the policy ensure that the Plan delivers the right homes for the right people, as envisaged by the Framework?

19. As a consequence of part 5 of Strategic Policy 03 failing to reflect the evidence that supports the Plan with respect to the type of housing that is needed within the LBH, the Plan will not ensure that the right homes for the right people are delivered and would conflict with paragraph 62 of the Framework.
20. Furthermore, as demonstrated within our Regulation 19 representations to Strategic Policy 03⁸ and to Policy HO1, the spatial strategy and site selection process that underpin the Plan is not conducive to delivering the mix of homes outlined by part 5 of Strategic Policy 03, let alone meet the needs identified by the evidence that supports the Plan.
21. On this basis, there is a clear conflict with the Framework and the Plan is fundamentally unsound with respect to its approach in relation to delivering the type of homes that are needed within the LBH.

Q7.3 A number of concerns have been raised regarding the approach to the windfall allowance and whether this presents justified and effective approach. Are these concerns valid?

22. The approach is not justified.
23. As identified in response to other questions, small sites (which comprise the Plan's windfall allowance) will not deliver the family housing that is identified to be needed with LBH.

⁷ Notably, paragraphs 64-80

⁸ Notably, paragraphs 64-80

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Policy H01: Dwelling size mix

Q10.1 Does the requirement for a minimum of 25% of all units to be family sized dwellings (three bedrooms or more) accord with the evidence base or should this be higher?

24. As outlined in detail in response to Q6.2 and Q6.3 earlier in this Statement, the requirement for a minimum of 25% of all units to be family-sized dwellings (three bedrooms or more) does not fully align with the evidence base and should be significantly higher.
25. The Updated Harrow LHNA (February 2024), document ref. EBH02, identifies a clear need for 48.7% of 3-bedroom dwellings and 19.8% of 4+ bedroom dwellings based on a total housing need of 24,266 units, or 54.5% of 3-bed dwellings and 23.7% of 4+ bed dwellings based on a total need of 16,040 units up to 2041.
26. Given this, the 25% target for family-sized housing falls significantly short of addressing the actual need. This target does not reflect the demand for larger homes as identified in the LHNA and, therefore, requires modification to reflect the identified needs of the Borough. This would help ensure the delivery of more appropriately sized homes to meet the needs of families, as well as support the creation of more inclusive and balanced communities.
27. Having proper regard to this evidence should have informed the type and range of sites allocated by the Plan. Instead, as drafted, the Plan does not have regard to its own key evidence with respect to housing needs within the LBH.
28. This approach is entirely inconsistent with paragraphs 8a, 60 and 63 of the Framework, which require planning policies to reflect the type of homes that are needed and to allocated sites that are capable of meeting these needs.

Q10.2 Is the policy as drafted sufficiently flexible and does it present a justified and effective approach?

29. The policy, as currently drafted, lacks sufficient flexibility and is not fully justified or effective in meeting the housing needs of the Borough.
30. While the policy aims to balance the delivery of family housing with the constraints imposed by the London Plan's land availability-based housing targets, this balance may not be achievable given that the London Plan itself is not delivering an appropriate amount of family housing (as noted in the Secretary of State's requirement for an early review of the London Plan – quoted within our Regulation 19 representations to Strategic Policy 03). The London Plan's shortfall in facilitating

sufficient family housing contributes to the ongoing housing crisis, where families are increasingly being driven out of the capital due to the lack of suitable accommodation.

31. Thus, while the policy aims to balance family housing delivery with land constraints, it is not effective in ensuring the Borough meets its actual housing needs, especially given the shortfall in family housing provision under the current approach.



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