

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

Weeks 1 & 2: Matter 5

## **Hearing Statement**

prepared by CarneySweeney

on Behalf of Barwood Land

Date: 4<sup>th</sup> June 2025





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## 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 5: Meeting the Borough's Housing Needs, specifically;
- 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*);
  - issue 7 (*is the approach to small sites and the contribution that these can make to supply justified and consistent with the London Plan?*); and
  - Issue 8 (*whether the approach towards the delivery of housing land is justified, effective, positively prepared and consistent with national policy as well as the London Plan*) as defined by the Inspector. In particular, it responds to the Inspector's questions 6.1 – 6.3, 7.2 – 7.3, 8.3 – 8.4 & 8.6, detailed further below.
- 1.0.3 This Statement should be read alongside our further Statement has been submitted in relation to Matter 3, Issue 4.



## 2.0 Matter 5, 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

*6.1 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?*

- 2.1.1 Our response is 'Yes', these concerns are valid and 'No', this approach is not justified.
- 2.1.2 The approach does not take into account future need and is only based on current housing needs, which will result in the undersupply of housing over the plan period.
- 2.1.3 The Plan does not provide a clear and justified method for rolling over the London Plan target for the last 10 years of the plan. The plan has not, therefore, been positively prepared and it cannot be demonstrated that it meets the area's objectively assessed needs.
- 2.1.4 The London Plan will become out of date in March 2026, with a new London Plan indicatively timetabled for 2027. The recently released consultation document by the Mayor of London, 'Towards a New London Plan' May 2025, refers to Central Government's new housing requirement for London being 88,000 new homes per annum to meet arising needs. Such a significant increase in the housing requirement (and indeed even an increase of only a proportion of this) will result in the housing strategy and housing supply of Harrow being woefully inadequate to meet requirements.
- 2.1.5 Such a significant shortfall will inevitably result in the need for a very early review of the plan.
- 2.1.6 We accept that for the purposes of this Examination, the London Plan is currently up-to-date, and that the new London Plan indicatively timetabled for 2027 is not relevant to this plan-making process, but there needs to be an acknowledgment in examining this plan that the housing requirements are going to increase given the Government's renewed emphasis on delivering homes, and a target of delivering 1.5 million homes over the next 5 years, including 88,000 homes per annum in London. If found sound, the submitted plan will become out of date very quickly.



*6.2 Is the mix of housing identified at part 5 of the policy justified and supported by robust evidence?*

- 2.1.7 The principle of the identified housing mix is justified. Paragraph 3.144 of the Council's latest Annual Monitoring Report (ODS01) confirms that the strategic target for 25% of all housing to be 3 or more bedrooms was not met over the last 5-year monitoring period, with a delivery of 13.5% falling significantly below the 25% target. Based upon the results of the latest 5-year monitoring period, and the previous 25% strategic target, further emphasis should be placed on the need to deliver these family units in the Plan to ensure that such supply is boosted.
- 2.1.8 The Harrow Local Housing Needs Assessment Update (February 2024) (EBH02) formed part of the evidence base for the Plan. Figure 53 sets out the Overall Dwelling need for Affordable Housing and Market Housing by property size, which highlights that 48.7% of the identified housing need is for 3-bedroom dwellings, and a further 19.8% of the overall need is for 4+ bedroom dwellings. This demonstrates that there is a significant need for larger homes within the Borough. However, the need identified in the evidence base has not been fully reflected in Strategic Housing Policy 03. The densities for the Site Allocations are as follows, suggesting that predominantly apartments and flats without gardens will be delivered:
- Havelock Place – 309dph
  - Poets Corner – 255dph
  - Wealdstone Probation Office – 412dph
  - Byron Quarter – 111dph
  - Iceland Wealdstone – 114dph
  - Kodak – 160dph
  - Kodak Administration Offices – 255dph
  - Grange Farm – 74dph
  - Vernon Lodge – 156dph
  - Travellers Rest – 158dph
  - Anmer Lodge – 103dph



- 2.1.9 We request that the Council provides an explanation as to why a higher strategic target for family dwellings has not been proposed in the Plan, given the clear and identified need outlined in the evidence base which will evidently not then be met.

*6.3 How will the policy ensure that the Plan delivers the right homes for the right people, as envisaged by the Framework?*

- 2.1.10 Question 6.3 is a matter for the Council to respond to and, depending on the Council's response to this question, we may have further comments to make during the Examination Hearing session.



### **3.0 Matter 5, Issue 7: Is the approach to small sites and the contribution that these can make to supply justified and consistent with the London Plan.**

*7.2 The Plan indicates that the approach to windfall allowance comes from the London Plan and the small site target of 375dpa as set out in paragraph 4.2.3. Reference is also made to the Small Sites Capacity Study dated 2022 (EBH05) which includes data up to 2019. Is there any more up to date evidence since 2019 on small site delivery within the Borough? Is this figure based on up to date evidence and does the evidence base demonstrate that this will form a reliable source of supply?*

- 3.1.1 The first part of Question 7.2 regarding up-to-date evidence on small site delivery is a matter for the Council to respond to and, depending on the Council's response to this question, we may have further comments to make during the Examination Hearing session.
- 3.1.2 Moving onto other parts of the Question, the evidence base for the Plan does not demonstrate that small site delivery will form a reliable source of supply in the Borough.
- 3.1.3 The Small Site Capacity Study (2022) (EBH05) includes data up to 2019 and seeks to identify potential small sites that might contribute towards the Borough's target for new homes. No detail has been provided regarding the potential small windfall sites identified. Therefore, these cannot be considered deliverable, as they have not been evidenced and do not meet the NPPF definition of deliverable. Please refer to our Hearing Statement on Matter 3.
- 3.1.4 In accordance with the NPPF, the proposed windfall rate should have regard to the previous windfall completions (para. 75). The Authority Monitoring Report (AMR) 2019/20 and 2020/21 (ODS01) confirms that during the period 2020/21, there was an increase of 202 units on small sites which have planning permission but where this has not yet been implemented. The new build small sites under construction resulted in a net increase of 108 units during the period 2020/21. This does not provide sufficient reliable evidence that the Council would achieve the small site target of 375 units annually.
- 3.1.5 In view of that set out above, the plan is unsound as it is not supported by justified and reliable evidence to demonstrate that the small windfall site supply will form a reliable source for meeting the Council's housing need.





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

- 3.1.6 Our response is 'Yes'. We are concerned that the Council has engaged in double counting. Development has commenced at some of the site allocations listed. No evidence has been provided by the Council to date to demonstrate that they are not double counting sites (NPPF para. 75). The Council's approach to the windfall allowance is not sound.
- 3.1.7 We may have further comments to make during the Examination Hearing session depending on the Council's response to this question.



#### 4.0 Matter 5, Issue 8: Whether the approach towards the delivery of housing land is justified, effective, positively prepared and consistent with national policy as well as the London Plan.

*8.3 Has the Council provided sufficient evidence to demonstrate that the Plan will provide a sufficient supply of deliverable sites (years 1 to 5) and then developable sites beyond this period (years 6 to 15) to demonstrate that the Plans housing requirement will be met?*

- 4.1.1 Our response is 'No', the Council has not provided sufficient evidence to demonstrate that the Plan will provide a sufficient supply of deliverable sites and accordingly the Plan is unsound.
- 4.1.2 The Council falls considerably short of the 'clear evidence' required to demonstrate deliverable sites. As outlined in our response to Matter 3, Question 4.11, a number of the sites listed in the 1 – 5-year trajectory, as outlined in Table 1 in our Hearing Statement on Matter 3, do not meet the definition of deliverable. The Inspector is respectfully asked to cross refer to that Hearing Statement for further detail in respect of these points.
- 4.1.3 In addition, the housing trajectory provided at Appendix 1 of the Plan states that 4,527 dwellings will be delivered within the 1 – 5-year period. However, this information is incomplete as it does not break down the number of units expected to be delivered from each site, which is essential in demonstrating a sufficient supply of deliverable sites.
- 4.1.4 The Council's decision to proceed with this unevidenced housing trajectory approach has resulted in the Plan falling considerably short of the 'clear evidence' required to demonstrate that the Plan will provide a sufficient supply of deliverable and developable sites.

*8.4 Will the Plan provide a five-year supply of specific deliverable sites upon adoption? The Council are requested to identify the sites they are relying upon for this, and provide clear evidence that the sites identified under 'permission or legal agreements', as well as the allocations, will be completed.*

- 4.1.5 At this stage the Council has not provided clear evidence, as outlined in our response to Question 8.3 above and in our Hearing Statement in respect of Matter 3 and Iso relevant to this question.
- 4.1.6 In determining whether the sites identified under 'permission or legal agreements', as well as the allocations, will be completed, the latest Housing Delivery Test (HDT) results and potential future trends of the supply of homes in the Borough provide an indication on the likely delivery of dwellings.



4.1.7 The London Plan Annual Monitoring Report 19 2021/24 (2024) provides details on the housing completions in Harrow 2017/18 to 2021/22 (Table 2.1.24), showing a 5-year average of 849 dwellings, which is above the required target. However, the latest figures show a significant decline in delivery as summarised below:

- 2017/18 – 770 dwellings
- 2018/19 – 1,238 dwellings
- 2019/20 – 1,400 dwellings
- 2020/21 – 199 dwellings
- 2021/22 – 637 dwellings

4.1.8 The above suggests that housing delivery is declining, demonstrating the need for the Council to demonstrate a five-year supply of deliverable sites upon adoption.

4.1.9 Our response to Matter 3, Question 4.11 in our separate Hearing Statement should also be noted.

*8.6 What sources of information have informed the build our rates and delivery information contained within the housing trajectory? Are these figures realistic and up to date?*

4.1.10 Question 8.6 is a matter for the Council to respond to and, depending on the Council's response to this question, we may have further comments to make during the Examination Hearing session. To confirm, it is not clear at present where the figures provided have been delivery and how this is supported at this stage.

