

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

Matter 6: Site Allocations including the
Harrow and Wealden Opportunity Area
Strategy

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

June 2025

Issue 12: Whether the proposed site allocations within the Plan are positively prepared, justified, effective and consistent with national policy and in general conformity with the London Plan

All Site Allocations

Q12.9 In terms of the identified uses and policy considerations, are these based on sound evidence?

1. No.
2. As discussed in detail within our Matter 2 and 5 Statements, the Plan does not respond to the type of housing identified to meet the identified needs within the London Borough of Harrow ("LBH")¹. This manifests in the site allocations identified within the Plan, which rely on the delivery of development at very high densities against the backdrop of the majority of the housing need being for family housing. This is demonstrated by our Regulation 19 representations to Chapter 11 of the Plan, which includes a schedule of the draft allocations with the required densities to meet the minimum housing figures at pages 3&4.
3. Paragraph 60 of the National Planning Policy Framework ("the Framework")² requires a sufficient amount of land to come forward to meet identified needs. Paragraph 63 of the Framework adds that planning policies should reflect the size, type and tenure of housing needed. The Plan is inconsistent with these requirements.

Q12.13 The Council have specified within CSD05 that site allocation capacities have been informed by design-led capacity studies. This is set out at EBH01 which identifies at paragraph 4.24 that where design led capacities have been used, a further 10% uplift has been applied. The justification for this is set out at appendix A. Given that the text recognises that the previous capacity approach was based on a density matrix, is the 10% uplift justified? Have the Council taken into account the representations made by CPR regarding tree planting and woodland creation in relation to sites HRW001-HRW005? If not why not?

4. Following on from our response to Q12.9, the Plan's approach with respect to density of development further illustrates that the Plan simply focuses on meeting the quantitative housing *target*³ at the expense of delivering the type of homes that are needed to meet the needs of the LBH.

¹ As identified by the Updated Harrow Local Housing Needs Assessment (February 2024) – document ref. EBH02

² 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

³ Noting that this is substantially lower than the minimum Local Housing Need for the LBH – please see our Matter 5 Statement

5. The examples provided as a comparison of allocated and realised development within Table A2 of Appendix A of the Site Selection / Allocation methodology document – document reference EBH01 – are very high density developments that would not be conducive to delivering family homes⁴.
6. Furthermore, as outlined within our Regulation 19 representations to Strategic Policy 06 and Policy GI2, delivering higher density development comes at a compromise of delivering other land uses within sites – notably community facilities, open spaces and green infrastructure that are needed to meet identified needs.
7. We do not contest the need to make efficient use of land, which is consistent with the requirements of chapter 11 of the Framework, but the Plan must include sites that are capable of delivering meaningful a quantum family housing in addition to community facilities, open spaces and green infrastructure.

⁴ As identified in our Regulation 19 representations to Chapter 11 of the Plan



Nexus Planning

Suite B
3rd Floor
Beacon Tower
Bristol
BS1 5AQ

T 0118 214 9340

nexusplanning.co.uk