

Harrow Local Plan 2021-2041 – Examination in Public**Note to Inspector – Open Space Evidence****3rd July 2025****1. Background**

1.1 This note has been prepared in response to the discussion on Matter 4, Issue 5, question 5.32, specifically in relation to whether the evidence base which supports Policy GI2 (Open Space) of the submitted Local Plan is up to date.

1.2 The following paragraphs:

- Outline the relevant provisions of national, London wide and local policy;
- Provide a commentary on the Council's open space evidence;
- Explain the inclusion of evidence on open space in the IDP;
- Confirm the conformity of policy GI2 with the London Plan; and
- Explain the proposed future steps.

1.3 For the avoidance of doubt the submitted evidence base for policy GI2 is contained in Chapter 12 of the London Borough of Harrow Infrastructure Delivery Plan (IDP), examination reference EBIT01. This document summarises the key findings of the London Borough of Harrow Open Space PPG 17 study, produced in 2011, particularly the surplus and deficiencies of open space across the borough.

2. Policy Context

2.1 The relevant policy considerations relating to the Council's Open Space Study are as follows:

The National Planning Policy Framework (December 2023)

2.2 Paragraph 31 of the Framework provides general comments on the evidence to support Local Plan, noting that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.

The London Plan

2.3 Policy G4 of the London Plan states that development plans should undertake a needs assessment of all open space to inform policy and notes that assessments should identify areas of public open space deficiency, using the categorisation set out in Table 8.1 (associated with the policy) as a benchmark.

Policy GI2 in the emerging Local Plan

2.4 Policy GI2 of the Council's emerging Local Plan sets the requirements for new development in relation to open space provision. The policy notes that development should not result in the net loss of open space but does not contain numerical targets for

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retention or provision. Changes are proposed to the policy in the Schedule of Proposed Modifications, examination document reference LBH/ED9.

2.5 Part A (a) notes that development proposals must contribute to the protection and enhancement of high quality multi-functional publicly accessible open space, particularly in areas of deficiency.

3. The age of the evidence and changes to open space across the borough

3.1 The Council notes the questions raised by the Inspector at the hearing sessions on 26th June regarding its reliance on the 2011 Open Space study (LBH/ED19) and whether the findings continue to be up to date, specifically in relation to Part A (a) of Policy GI2. Other parts of GI2 are less reliant on this evidence. However, the overall amount and distribution of open space across the borough has remained largely unchanged since this time.

3.2 The Atlas of Change - Regulation 19 (November 2024), examination document CSD02a outlines proposed changes to the current policies map, including 11 changes to designated open space across the borough (references OS01 – OS11).

3.3 These changes have arisen from new development proposals and incorporate 5 specific gains in open space totalling 5.497 hectares and 7 specific losses amounting to 3.884 hectares. The overall change in designated open space across the borough, therefore, is a net gain of 1.613 hectares.

3.4 An extract from the Atlas of Change document summarising the location, extent and distribution of changes is attached as Appendix 1. Overall, the findings are consistent with the 2011 study. There continues to be a deficiency in open space provision across the borough and the identified distribution of deficiency and surplus outlined in the IDP has not substantially changed.

3.5 It should be noted that the Council's Biodiversity Net Gain Working Paper (examination document EBBC01) also provides a commentary on the distribution of open space as part of the justification of the Council's BNG target. This document notes that open space is predominantly located in the north of the borough with lower levels of provision in the south. Whilst the paper focuses on biodiversity implications, it is noted that development and population growth will place greater pressure on limited public and private open space.

3.6 Taking account of these factors, the Council continues to be of the view that the findings of the 2011 study are a reliable source of evidence to support policy GI2. Furthermore, the current policy approach has been successful in preventing large scale losses of open space across the borough.

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Evidence produced by other West London Boroughs

3.7 The Council's analysis has found that boroughs in the West London sub region are similarly content to rely on open space evidence that is more than 5 years old, predating the current London Plan. Specific attention is drawn to London Borough of Barnet's Local Plan, which was supported by evidence produced in 2009 and 2016. Both studies are referred to the Inspectors' report, which found the plan to be sound. The London Borough of Ealing's Local Plan is currently at examination and refers to open space evidence for the period 2012 – 2017.

3.8 The circumstances relating to each borough are different but reflect a wider picture that the pattern of open space tends to remain largely unchanged. This is because the opportunities to create new open spaces in urbanised locations are limited and the current policy framework sets a presumption against the loss of open space. The conclusions of open space evidence tend to remain relevant for longer than other areas of the evidence base.

4. Availability of the Evidence

4.1 The Council did not publish the 2011 Open Space Study as part of the evidence base for the Local Plan but has now done so (LBH/ED19). Open space forms part of the Green Infrastructure network across Harrow and the IDP is considered to be the most appropriate evidence base document to reflect the latest position.

4.2 Unlike other aspects of the evidence base, the IDP is a 'live' document that can be continuously updated as changes to infrastructure occur across the borough. The Council intends to capture significant infrastructure changes through ongoing monitoring and update the IDP accordingly.

4.3 The approach of reflecting the latest position on open space in the IDP is consistent with other boroughs, including the London Borough of Ealing.

5. London Plan Conformity

5.1 The Council has engaged effectively and on an on-going basis with the Greater London Authority (GLA) as part of the plan making process. The nature discussions and the matters raised are outlined in the Council's Duty to Co-operate Statement (examination reference SCG04). No specific matters were raised by the Mayor in relation to London Plan policy G4. The Mayor wrote to the Council on 16th December 2024, confirming that the policies in the emerging plan were in general conformity with the London Plan.

5.2 The Mayor is currently reviewing London wide evidence to support the new London Plan. It is noted that the following evidence will be prepared:

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- London Green Infrastructure Framework (GLA) – Planned for Autumn 2025; and
- Public Open Space Mechanisms Review (GLA) – Planned for Autumn 2025

5.3 These documents will guide the production the Council’s future evidence on open space.

6. Conclusions and Future Steps

6.1 The change in open space across the borough since the production of the last Local Plan amounts to addition of 1.613 hectares and is minimal.

6.2 The limited changes in open space indicate that development plan policies to protect open space across the borough are working well. The current evidence continues to provide an accurate picture of areas of open space deficiency and is therefore sufficient to support the implementation of policy GI2.

6.3 The Council’s evidence is broadly consistent with that produced by other west London boroughs and reflects that the pattern and amount of open space is not subject to significant change. The IDP is an appropriate location for evidence on open space as a source of green infrastructure.

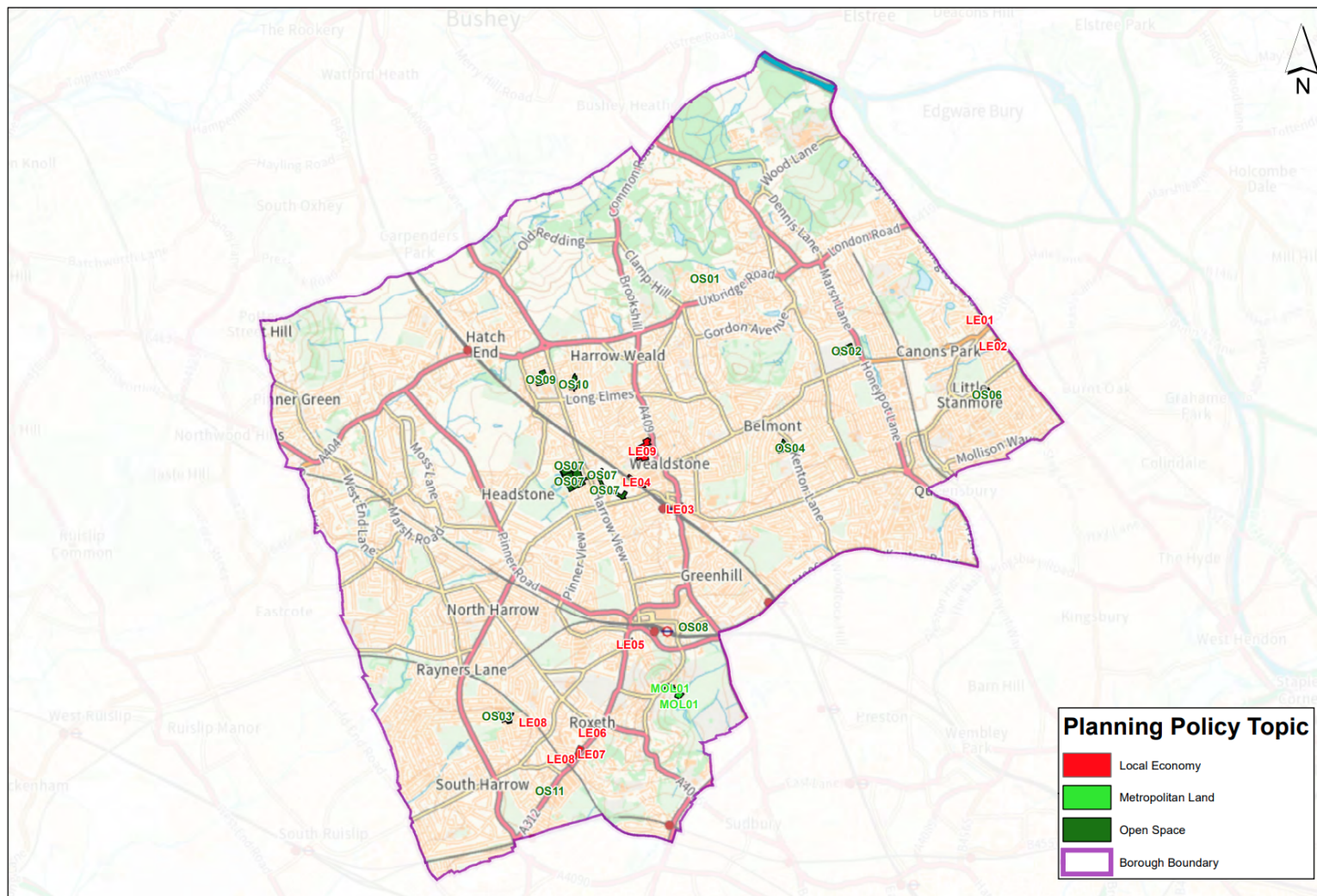
6.4 The Council will update the IDP to reflect the latest position on open space outlined in the Atlas of Change document and take account of population changes that have occurred since 2011. In addition, it is suggested that part A of GI 2 could be modified to note that identified deficiencies should reflect the findings of the latest available evidence.

6.5 The Council notes the provisions of policy G4 in the London Plan, which sets out the key content of open space assessments. The policy allows for these assessments to be undertaken at any time.

6.6 A comprehensive update of the Council’s open space evidence will be timed to reflect the findings of the London-wide evidence outlined in paragraph 5.2 of this note. The Council will also engage with the Mayor regarding any expected changes to policy G4 in the forthcoming draft London Plan, a draft of which is due to be published in 2026.

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APPENDIX1: EXTRACT FROM EXAMINATION DOCUMENT CSD02a: ATLAS OF CHANGE



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Open Space				
OS01	Open Space	Chenduit Way (part open space and part garages), Stanmore, HA7 3NY	Removal from open space designation: 0.0750 ha	Development permitted P/0185/15
OS02	Open Space	Whitchurch Playing Fields, Stanmore [Avanti House Secondary School]	Removal from open space designation: 0.420 ha	Development permitted P/4910/15
OS03	Open Space	Tithe Farm Sports & Social Club	Removal from open space designation 0.909 ha	Development permitted P/4602/15
OS04	Open Space	Kenton Lane Farm, Kenton Lane, Harrow Weald, Harrow, HA3 8RT	Removal from open space designation (private) and creation of new public open space. Remove 0.62ha and add 0.30ha	Development permitted P/3075/12 [Shown across 2 maps]
OS05	Open Space	Eliot Drive Re-development [Rayners Lane / Tranquil Lane / Austen lane / Eliot Drive -	Removal from open space designation: 0.74 ha*	Development permitted
OS06	Open Space	Krishna Avanti School	Removal from open space designation: 1.09 ha*	Development permitted P/4910/15 –
OS07	Open Space	Kodak Site	Addition to open space designation: 2.253 ha	Granted by way of P/5079/17 [Shown across 2 maps]
OS08	Open Space	Gayton Road (Lexicon Development), Harrow, HA1 2HH	Addition to open space designation: 0.06 ha	Development permitted P0291/16
OS09	Open Space	Hatch End High School, Headstone Lane, Harrow	Addition to open space designation: 1.714 ha	Development permitted P/0302/18
OS10	Open Space	Cedars First and Middle School, Whittlesea Road, Harrow, HA3 5RN	Addition to open space designation: 1.17 ha*	Development permitted and implemented (P/0170/16)
OS11	Open Space	Roxeth Library, Northolt Road, South Harrow, Harrow, HA2 8EQ	Remove open space designation from footpath to front of building: 0.03ha	Land located within the public highway and removed as part of site allocation process.

* Update to submitted AOC table to reflect extent of change to open space, for completeness